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Attorneys for Rangen, Inc.

BEFORE THE DEPARTMENT OF WATER RESOURCES
OF THE STATE OF IDAHO

IN THE MATTER OF THE
APPLICATION FOR PERMIT NOS.:
36-16976 & 36-17002

**I.R.C.P. 30(b)(6) NOTICE OF
TAKING DEPOSITION DUCES
TECUM OF NORTH SNAKE
GROUND WATER DISTRICT**

**TUESDAY, AUGUST 19, 2014
1:30 p.m.**

**BARKER, ROSHOLT & SIMPSON
195 River Vista Place, Suite 202
Twin Falls, ID 83301**

**TO: NORTH SNAKE GROUND WATER DISTRICT AND ITS COUNSEL OF
RECORD**

PLEASE TAKE NOTICE that Rangen, Inc. will take the deposition of North Snake Ground Water District before a certified Court Reporter, in accordance with the Rules of Civil Procedure of the State of Idaho, on Tuesday, the 19th day of August, 2014, at the hour of 1:30 p.m. at the Offices of Barker, Rosholt & Simpson, 195 River Vista Place, Suite 202, Twin Falls, ID 83301.

**I.R.C.P. 30(b)(6) NOTICE OF TAKING DEPOSITION DUCES
TECUM OF NORTH SNAKE GROUND WATER DISTRICT - 1**

RECEIVED
AUG 08 2014
Department of Water Resources
Eastern Region

Pursuant to I.R.C.P. 30(b)(6), the Deponent is required to designate one or more officers, directors, managing agents or other person(s) who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify, regarding the topics set forth below:

- The water Application for Permit No. 36-16976 (hereinafter "Permit") filed by North Snake Ground District and others.
- Describe how the District intends to perfect the Permit and place the water to a beneficial use.

The Deponent is further required to identify and bring the following documents:

1. All documents, books, papers, recordings, electronic data, emails, communications, photographs, or other documents or items reviewed in preparation for this deposition.
2. All documents evidencing consent or permission to use the place of use (POU) and/or point of diversion (POD) for those places listed on the Permit.
3. All documents showing how the Ground Water Districts have obtained access to the POD or POU listed on the Permit.
4. Any and all powers of attorney issued to the Budge Law firm or TJ Budge for the filling of the Permit.
5. Any and all corporate resolutions adopted by the Ground Water District or Districts giving the Budge Law Firm or TJ Budge the authority to file for water permits on behalf of the Districts.

6. All documents pertaining to any easements, rights of way or other access rights to the POU and POD listed on the Permit, which are located within and on Rangen Research Hatchery property.

7. All documents pertaining to any easements, rights of way or other access rights to the Rangen Research Hatchery for the purposes of perfecting the Permit.

8. All documents pertaining to any condemnation proceedings contemplated or initiated by any of IGWA's member groundwater districts in connection with the Permit.

The term "document" as used above includes, but is not limited to, notes (oral or written), memoranda, reports, studies, maps, surveys, plans, drawings, photographs, calculations, spreadsheets and any computer analyses, whether written or electronic in format.

All parties and their counsel are invited to attend. The oral examination will continue from day to day until completed.

DATED this 6 day of August, 2014.

MAY, BROWNING & MAY, PLLC

By: 

J. Justin May

CERTIFICATE OF SERVICE

The undersigned, a resident attorney of the State of Idaho, hereby certifies that on the 6 day of August, 2014 he caused a true and correct copy of the foregoing document to be served by email and first class U.S. Mail, postage prepaid upon the following:

Original: James Cefalo Idaho Department of Water Resources 900 N. Skyline Dr., Ste. A Idaho Falls, ID 83402-1718	Hand Delivery ☐ U.S. Mail ☒ Facsimile ☐ Federal Express ☐ E-Mail ☒
Randall C. Budge Thomas J. Budge RACINE, OLSON, NYE, BUDGE & BAILEY, CHARTERED P.O. Box 1391 101 South Capitol Blvd, Ste 300 Boise, ID 83704-1391 Fax: 208-433-0167 rcb@racinelaw.ne tjb@racinelaw.net bjh@racinelaw.net	Hand Delivery ☐ U.S. Mail ☐ Facsimile ☐ Federal Express ☐ E-Mail ☒
Blind Canyon Aquaranch, Inc. c/o Gary Lemmon 2757 South 1050 East Hagerman, ID 83332	Hand Delivery ☐ U.S. Mail ☐ Facsimile ☐ Federal Express ☐ E-Mail ☒
Craig Hobdey P.O. Box 176 Gooding, ID 83330	Hand Delivery ☐ U.S. Mail ☐ Facsimile ☐ Federal Express ☐ E-Mail ☒


Justin May