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DEPARTMENT OF
WATER RESOURCES

*faxed received
Dec 3, 2013*

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Attorney for Allen Ranch LLP

BEFORE THE DEPARTMENT OF WATER RESOURCES
OF THE STATE OF IDAHO

	)	
	)	NOTICE OF OBJECTION TO
IN THE MATTER OF APPLICATION FOR	)	SANDRA CHESS AND WEST
PERMIT NO. 65-23493 IN THE NAME OF	)	MOUNTAIN WATER
ALLEN RANCH LLP AND APPLICATION FOR	)	ASSOCIATION INC. WITNESS
TRANSFER NO. 78252 IN THE NAME OF	)	LIST AND MOTION TO
ALLEN RANCH LLP	)	DISALLOW TESTIMONY OF
	)	UNIDENTIFIED WEST
	)	MOUNTAIN WATER
	)	ASSOCIATION MEMBERS
	)	

COMES NOW the Applicant and gives notice of its objection to the Witness List submitted by Protestants Sandra Chess and West Mountain Water Association Inc.

In the Witness List (attached hereto), the Protestants disclose for the first time an intent to call "Any member of West Mountain Water Association Inc." The Protestants have failed to identify these witnesses and to generically list "Any member" constitutes an abuse of process and unfairness. These alleged members are never identified so the Applicant has no way of even knowing who these people may be. Other than identifying Jim Bunce and Jerry Dye as members of the Association, the Protestants have not identified any witness as a member or any member as a witness.

ORIGINAL

The Applicant respectfully requests the Hearing Officer not allow testimony by any unidentified member of West Mountain Water Association Inc.

Respectfully submitted this 3 day of December, 2013.

MOORE SMITH BUXTON & TURCKE, CHTD.

By: 
Bruce M. Smith
Attorney for Allen Ranch LLP

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 3 day of ~~November~~ ^{December}, 2013, I caused to be served a true and correct copy of the foregoing **APPLICANT'S DISCLOSURE OF WITNESSES** via prepaid, U.S. Mail, to the following:

Original to: (Via U.S. Mail)

Idaho Department of Water Resources
322 E. Front Street
P.O. Box 83720
Boise, ID 83720-0098

Copies to: (Via First Class U.S. Mail and Email)

Email: Shelley.keen@idwr.idaho.gov
Shelley Keen
Regional Manager, Western Region
Idaho Department of Water Resources
2735 Airport Way
Boise, ID 83705-5082

Email: schess123@msn.com
West Mountain Water Association Inc.
c/o Sandra Chess
1200 Lizaso Avenue
Boise, ID 83709

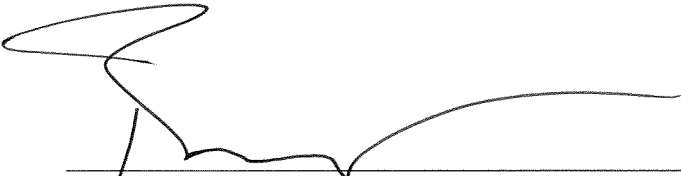
Email: randymcclintick@yahoo.com
Randy and Cris McClintock
PO Box 7
Orvada, NV 89425

Email: ibcascade@hotmail.com
James T. Bunce
PO Box 890
Cascade, ID 83611

Email: schess123@msn.com
Sandra Chess
1200 Lizaso Avenue
Boise, ID 83709

Email: djividen@frontiernet.net
West Mountain Properties LLC
c/o Dwight Jividen
413 Cabarton Road
Cascade, ID 83611

Gary E. Henkel
9109 W. Burnett Drive
Boise, ID 83709



BRUCE M. SMITH

West Mountain Water Association, Inc
c/o Sandra Chess
1200 Lizaso Ave
Boise, ID 83709
Protestant
and
Sandra Chess
1200 Lizaso Ave
Boise, ID 83709
(208) 863-8769
Protestant

**BEFORE THE DEPARTMENT OF WATER RESOURCES
OF THE STATE OF IDAHO**

IN THE MATTER OF APPLICATION FOR)
TRANSFER NO. 78252 and APPLICATION)
FOR PERMIT 65-23493 IN THE NAME)
OF ALLEN RANCH LLP)

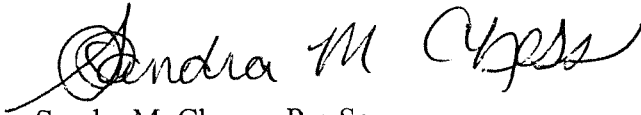
**West Mountain Water Assoc.
and Sandra Chess
Joint disclosure of witnesses**

Protestants West Mountain Water Assoc., Inc. and Sandra Chess; hereby submits joint list of witnesses. Protestants reserve the right to call rebuttal witnesses if deemed necessary.

Witnesses:

1. Any member of West Mountain Water Association, Inc.
2. see attached list from Interrogatory response under No. 1 & 2
3. Applicant
4. Any witness called by applicant

Respectfully submitted this 27th, day of November, 2013

A handwritten signature in black ink that reads "Sandra M. Chess". The signature is written in a cursive style with a large, stylized initial "S".

Sandra M. Chess – Pro Se

Sandra M. Chess – Director, West Mountain Water Association