

Williams Lake Recreational Water & Sewer District
Re: Water Right No. 75-7052 and 75-7589

Interrogatory No. 1: Please state name, address, telephone number of every person known to you or your attorney who may have any knowledge of any fact pertinent to this case and the knowledge possessed by such person.

A: The answer to this purposely broad question would encompass every person who has been acquainted with the Williams Lake water system as a user or a representative from the State Department of Water Resources during the past 15 years if not longer. Names that come to mind would be Gary Spackman, John McKinney, Kathleen Gliksman, Harold Sisco, Ken John, Fred Jacobsmeyer, Martin Capps, Gary Mulkey, Keith Amar, Jim Kingston (written testimony on record) Shelley W. Keen, Roger Warner, past and present members of the Williams Lake Recreational Water & Sewer District, Steve Adams, Kent Dahle...

While each and every one of them possesses knowledge that is in some way pertinent to the case now before the Department of Water Resources of the State of Idaho it would be presumptuous of me to speak their minds. As to the addresses and phone numbers, they are all contained within records already in your possession.

In short, question #1 as written is far too vague to constitute a reasonable request or engender a definitive answer.

Interrogatory No. 2: Please state the name, address and telephone number of each witness you intend to call at the hearing of this case and the subject matter and facts to which each will testify.

A: I have not personally called any witnesses but as a documented protestor reserve the right to ask questions of those testifying.

Interrogatory No. 3: State the name and address, phone number, training, scientific technical or technical or other specialized knowledge, skill, experience, education, substance of conclusions and opinions, the underlying facts and data upon which the opinion or conclusion is based, the physical evidence (if any) analyzed, and the present custodian of any such physical evidence, and/or report.

Refer to the state's original 1993 decree and stipulations on permit nos. 75-07589 and 75-07590 already in your files.

Interrogatory #4: State if you claim to being harmed by the Application for Amendment of Water Rights No. 75-7052 and N. 75-7589, please explain how you are being harmed and to what degree. How do you intend to prove you are being harmed by the Amendment, if approved.

Once again, refer to the original stipulations in the 1993 state order. They were put in place to protect the downstream water right claimants, the resource and the Williams

Lake property owners who are paying for the system. The agreement has not been honored by the present Williams Lake Water & Sewer Board.

As to which party is charged with the 'burden of proof' I would suggest that since it is the Williams Lake Water & Sewer Board which is applying for a new agreement/water right status it would be up to that entity, the applicant, to prove no harm will be incurred by any of the parties involved if the change is granted.

Interrogatory No. 5: Provide a detailed list of any and all exhibits whether documents, photographs or otherwise which you intend to present in this case and a summary of why you believe they are relevant and what facts you think they tend to establish. State the name and address of the person having custody of such exhibits.

A: 1993 state water right order. Municipal status does not fit the original terms of the water right.

Request for Production No.1: Please produce a copy of each and every document which you have in your possession which you have pertaining to any communication between you or any agent and any other person regarding the subject matter of this case.

A: For the past two years copies of all communication between me and the Department of Water Resources have been sent to all parties involved in the present case therefore the Williams Lake Water & Sewer District Board already has the material requested.

Request for Production No. 2: Produce all exhibits you intend to utilize for any purpose at any trial or hearing on this matter.

A: My intention is to exhibit the state's 1993 water right decree and may refer to past written communications with the state which are already on file.

Leslie May Shumate

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of June 2007, a true and correct copy of the above and foregoing document described hereinbelow was served on the following by mailing with the correct postage thereon, by facsimile or e-mail.

Documents served:

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9 Copper Mountain Road
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Thomas James Thompson
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Response to Request for Discovery

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Discovery Produced by
Jim Kingston

■ VHS Tape "William(s) Lake Water
Construction Tape" & Cassette tape
"Discovery - Williams Lake Idaho Bd 7/06"