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RECEIVED
MAY 29 2007
DEPT. OF WATER RESOURCES
SOUTHERN REGION

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

IN THE MATTER OF APPLICATION FOR)
AMENDMENT FOR WATER RIGHT NO.)
75-7052 and 75-7589 IN THE NAME OF)
WILLIAMS LAKE RECREATIONAL)
WATER & SEWER DISTRICT)

**REQUEST FOR
DISCOVERY**

TO: PROTESTANTS, in the above referenced application:

COMES NOW, Petitioners, Williams Lake Recreational Water and Sewer District, by and through their counsel of record, Milton A. Slavin, Esq., pursuant to Rules 33 and 34 of the Idaho Rules of Civil Procedure, and hereby requests that the Protestants to answer the following Interrogatories and Requests for Production within twenty (20) days from the date of service herein.

Preliminary Statement

1. In answering these Interrogatories, please furnish all information available to you, including information in the possession of your officers, employees, agents or representatives retained by you or your attorneys, not merely information known of your own personal knowledge.

2. If you cannot answer any of the following Interrogatories in full, after exercising due diligence to secure the information to do so, please so state and answer to the extent possible, specifying your inability to answer the remainder and stating whatever information knowledge you have concerning the unanswered portion.

3. If your answers are qualified in any particular manner please set forth the terms and explanations of each such qualification. If any answer is given which states an objection to the Interrogatory on any ground, please state such grounds completely. If the Interrogatory is only partly objectionable, answer the remainder of the questions as required by these instructions.

4. These Interrogatories are deemed continuing interrogatories and your answers thereto are to be supplemented as additional information and knowledge becomes available or known to you or your attorney.

INTERROGATORIES

INTERROGATORY NO. 1: Please state the 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.

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

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..

INTERROGATORY NO. 4: State if you claim to being harmed by the Application for Amendment of Water Rights No. 75-7052 and No. 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.

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.

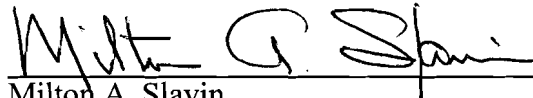
REQUESTS FOR PRODUCTION OF DOCUMENTS

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.

REQUEST FOR PRODUCTION NO. 2: Produce all exhibits you intend to utilize for any purpose at any trial or hearing on this matter.

DATED this 25th day of May 2007.

SLAVIN LAW OFFICE, CHTD.


Milton A. Slavin
Attorney for Petitioners

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 25th day of May 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:

Document(s) Served:

**Response to Request for Discovery, Request for
Discovery & Motion In Limine**

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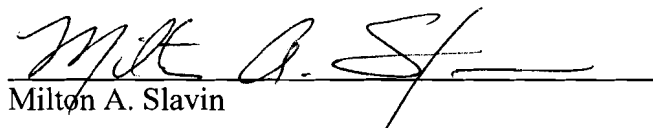
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