

To : Gary Spackman
From: Kathleen Glikman

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Date : August 28, 2006
From : Kathleen Gliksman
To: : Williams Lake Recreational Water and Sewer District Board
C/o Jock Slavin
Re : Expert Witness List
Request for Documents
Interrogatories

Please send responses to:

Kathleen Gliksman
87 Dapplegray Lane
Rolling Hills Estates
California 90274

Phone (310) 325-9315
Fax (310) 325-2350
Email kathleen1387@cox.net

List of Expert Witnesses

Steve Adams
Kent Dahle
Greg Eggar
Jim Kingston
Kay McAtee
John McKinney
Harold Sisco
Bill Smith

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Request for Documents

1. Please forward copies of any and all documents related to the District Board's decision to seek municipal status and the application process to date. This includes, but is not limited to, all correspondence (either written or electronic) between the District's Board or it's members or it's lawyer or it's accountant and
 - a) Forsgren and it's employees
 - b) IDWR and it's employees
 - c) DEQ and it's employees
 - d) Williams Lake Sewer Association and it's members
 - e) Idaho Water User's Association and it's employees
 - f) Any and all property owners within the WLRW&SD boundaries
2. Please forward copies of any and all resolutions passed by the District from 1993 to present.
3. Please forward copies of any and all reports submitted to the District by it's Watermaster.
4. Please forward copies of any and all monthly maintenance reports since 1993 including breakdowns, costs and amounts of maintenance fund residuals that roll over into the general funds at the end of each fiscal year.

Interrogatories

1. Explain and describe the District plan for utilizing municipal status.
2. How many new patrons does the District plan to service under municipal status?
3. Describe the District financial plan for funding any expansion.
4. Describe the District's managerial expertise with regard to expansion.
5. Explain the advantage of municipal status over recreational status with regard to District goals.
6. What date in 2005 was the real property transfer from the Williams Lake Sewer Association to the District ?
7. How many gallons of water per day per household is planned if expansion occurs?
8. How many gallons of water is planned for fire flows if expansion occurs?

I hereby certify that today, August 28th, 2006 I have notified the following parties with a true and correct copy of my list of expert witnesses, request for documents and interrogatories. Each method of notification is noted.



Kathleen Gliksman

Hardcopy sent to Gary Hawkins and Valeea Steinbrugge

Fax sent to Alan Bittner, Jock Slavin, Williams Lake Recreational Water and Sewer District, Jim Kingston and Gary Spackman

Email attachments sent to Gary Mulkey, Leslie Shumate and Tommy Thompson