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Attorneys for Claimant/Objector Brian T. Farley

**IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS**

In Re CSRBA

Case No. 49576

)
) Subcase Nos. 95-16445 & 95-18409
)
) **NOTICE OF TAKING DEPOSITION**
) **DUCES TECUM OF CRAIG**
) **SAXTON**
)
)

TO: Clerk of the Court and all parties and attorneys of record:

PLEASE TAKE NOTICE that Travis L. Thompson, counsel of record and on behalf of Claimant/Objector Brian T. Farley, will take the deposition of Craig Saxton in accordance with the *First Amended Scheduling Order* issued on February 9th, 2024, and Idaho Rules of Civil Procedure 26, 30(a), and 34. The deposition is scheduled to begin at **9:00 a.m. on Tuesday March 26, 2024** and continue day-to-day thereafter until completion at the Idaho Department of Water Resources State Office, **322 E. Front St., 6th Floor (Director's Conference Room), Boise, Idaho 83702**. The deponent must be present in person. The court reporter will also participate in person. Attorneys may participate in person.

The deponent is required to bring with him true and correct copies of all documents reviewed in connection with this matter that relate, directly or indirectly, to the topics identified above, including but not limited to the following:

1. All documents, memoranda, reports, analyses or notes relied on by the Department to produce the *Supplemental Director's Report Regarding Subcase NOS 95-16445 & 95-18409* filed with the Court on September 21st, 2023.
2. The Department's claim file for water right 95-16445.
3. The Department's claim file for water right 95-18409.
4. The Department's claim file for water right 95-17752.
5. All documents and communications between the Department and claimants Arthur & Katherine Gideon and their attorneys or other agents.
6. All documents and communications between IDWR and any other person related to water right claims 95-18409, 95-16445 and 95-17752.

For purposes of this notice, the term "document(s)" is to be interpreted as broadly as Idaho Rule of Civil Procedure 34 allows and includes all written or graphic matter, whether physical or electronic, however produced, including, but not limited to, letters, emails, text messages, notes, memoranda, meeting minutes, reports, directives, proposals, summaries, analyses, spreadsheets, internal communications, external communications, studies, surveys, working papers, and other physical or electronic data of any kind.

The oral examination will continue from day-to-day until completed.

DATED this 12th day of March, 2024.

MARTEN LAW LLP



Travis L. Thompson

Attorneys for Claimant/Objector Brian T. Farley

CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of March, 2024, I served true and correct copies of the foregoing **NOTICE OF TAKING DEPOSITION DUCES TECUM OF CRAIG SAXTON** by the method indicated below, and addressed to the following:

Clerk of the Court
CSRBA
253 3rd Ave. North
P.O. Box 2707
Twin Falls, Idaho 83303-2707

☐ U.S. Mail, postage prepaid
☒ Hand Delivery
☐ Facsimile
☐ Overnight Mail
☐ Email

Andy Waldera
Sawtooth Law Office
1101 W. River St., Suite 110
Boise, Idaho 83702
andy@sawtoothlaw.com

☒ U.S. Mail, postage prepaid
☐ Hand Delivery
☐ Facsimile
☐ Overnight Mail
☒ Email

Director of IDWR
Idaho Department of Water Resources
P.O. Box 83720
Boise, Idaho 83720-0098

☒ U.S. Mail, postage prepaid
☐ Hand Delivery
☐ Facsimile
☐ Overnight Mail
☐ Email

Chief, Natural Resources Division
Office of the Attorney General
State of Idaho
P.O. Box 83720
Boise, Idaho 83720-0010

☒ U.S. Mail, postage prepaid
☐ Hand Delivery
☐ Facsimile
☐ Overnight Mail
☐ Email

United States Dept. of Justice
Environment & Natural Resources Division
550 W Fort Street, MSC 033
Boise, Idaho 83724

☒ U.S. Mail, postage prepaid
☐ Hand Delivery
☐ Facsimile
☐ Overnight Mail
☐ Email



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