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DEPARTMENT OF
WATER RESOURCES

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October 5, 2012

Sarah Klahn
White & Jankowski
Kittredge Building
511 Sixteenth Street
Suite 500
Denver, CO 80202

Re: Remaining Discovery Items

Dear Ms. Klahn:

I am in receipt of your letter dated October 4, 2012 concerning outstanding document requests. I am aware of the requests and can assure you that we are working diligently to respond to all of the various requests that are being made. Rangen has produced a tremendous volume of documents in a very short period of time. With respect to the remaining items on your list, the process of producing the electronic documents is time consuming. It requires unearthing old computers, cobbling together the pieces to make them work (old mouse, monitors, etc.), getting the files in a readable format, reading through old files to find the ones being requested, then redacting financial and unrelated information, and then uploading them. Each step of this process takes time and patience as computers churn to read old files. In the middle of this process came a request to inspect a large volume of research materials dating back decades. Getting that material organized so that it can be reviewed in a reasonable fashion, frankly, became a bigger priority than producing electronic copies of documents that have already been produced in a paper format.

Last night I uploaded the fish production summaries from Ms. Petershmidt's old computer. I anticipate getting the rest of the documents produced by the end of next week. As you know, we have a document production session on Monday that will take all day and I anticipate that it will spill into Tuesday if the documents are actually reviewed rather than simply

Ms. Klahn
October 5, 2012
Page - 2

boxed up to be scanned. If you would like to discuss this matter further, please call me. Otherwise, you can look for additional documents to be uploaded next week.

Very truly yours,

BRODY LAW OFFICE, PLLC

By: _____


Robyn M. Brody