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DEPARTMENT OF  
WATER RESOURCES

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ATTORNEYS FOR THE IDAHO GROUND WATER  
APPROPRIATORS

ATTORNEYS FOR THE CITY OF POCATELLO

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

**IN THE MATTER OF DISTRIBUTION OF  
WATER TO WATER RIGHT NOS.  
36-02551 & 36-07694  
(RANGEN INC.)**

Docket No.: CM-DC-2011-004

**JOINT NOTICE OF TAKING  
DEPOSITION DUCES TECUM OF SEAN  
VINCENT**

**To: SEAN VINCENT, AND HIS COUNSEL OF RECORD, GARRICK BAXTER, CHRIS  
BROMLEY, IDAHO DEPUTY ATTORNEYS GENERAL:**

Please take notice, that counsel for the City of Pocatello and the Idaho Ground Water Appropriators Inc. ("IGWA") will jointly take your testimony upon oral examination as a witness, **SEAN VINCENT**, pursuant to Rule 30, I.R.C.P., other applicable rules of the Idaho Rules of Civil Procedure and applicable rules of the Idaho Department of Water Resources Procedural Rules, IDAPA 37.01.01. The deposition will take place before a court reporter and Notary Public with the firm of **JOINT NOTICE OF TAKING DEPOSITION DUCES TECUM OF SEAN VINCENT, IDWR**

M&M Court Reporting Service or other duly qualified person in the above-captioned matter. Said deposition will commence at **3:30 p.m.** or on a trailing docket at the close of the deposition of Tim Luke, on **Thursday March 14, 2013**, and continue from day to day until completion, at the **M&M Court Reporting Offices, 421 W. Franklin Street, Boise, Idaho 83702**, at which time and place you are notified to appear and take part in such examination.

Please take additional notice that the deposition will be conducted via Video Conferencing as well as live at the IDWR State Office.

Pursuant to Idaho Rules of Civil Procedure 26, 30(b)(5) and 34 and IDAPA 37.01.01.525, this notice further instructs you to bring to the deposition the following materials:

1. All documents you have reviewed and will review in preparation for this deposition.
2. Curriculum Vitae, including a full record of publications in which you are listed as an author.
3. All documents, not previously produced, which were relied upon, incorporated, or utilized by you to prepare the February 27, 2013 *Staff Memorandum in Response to Expert Reports Submitted for Rangen Delivery Call (In the Matter of Distribution for Water to Water Right Nos. 36-02551 and 36-07694)*.

For purposes of this notice, “document” includes but is not limited to memoranda, notes (field, meeting, or otherwise), graphs, logs, reports, studies, maps, photographs, calculations, spreadsheets, any computer analyses, ledgers, letters, receipts, sketches, publications, drawings, flow charts, manuals, worksheets, pamphlets, manuals and data compilations in whatever form. “Document” shall further collectively include the original, duplicate original and any or all copies or reproductions of the original document, to the extent that any or all copies are different in any way from the original document, whether by interlineations, notations, or indication of copies sent or received otherwise, which are within your possession, custody or control.

JOINT NOTICE OF TAKING DEPOSITION DUCES TECUM OF SEAN VINCENT, IDWR

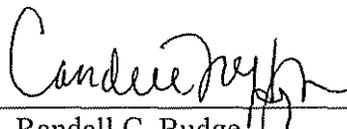
Respectfully submitted this 5<sup>th</sup> day of March, 2013.

CITY OF POCA TELLO ATTORNEY'S OFFICE

WHITE & JANKOWSKI

By:   
Sarah A. Klahn

RACINE, OLSON, NYE, BUDGE &  
BAILEY, CHARTERED

By:   
Randall C. Budge  
Candice M. McHugh  
Thomas J. Budge  
*Attorneys for IGWA*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 5th day of March, 2013, I caused to be served a true and correct copy of the foregoing, **JOINT NOTICE OF TAKING DEPOSITION DUCES TECUM OF SEAN VINCENT**, upon the following by the method indicated:

  
Signature of person mailing form

Director, Gary Spackman  
Idaho Department of Water Resources  
PO Box 83720  
Boise, ID 83720-0098  
Attn: Deborah Gibson  
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[Kimi.white@idwr.idaho.gov](mailto:Kimi.white@idwr.idaho.gov)

- U.S. Mail/Postage Prepaid
- Facsimile
- Overnight Mail
- Hand Delivery
- E-mail

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*Courtesy copy to:*  
M&M Court Reporting Service, Inc  
421 W Franklin Street  
PO Box 2636  
Boise, ID 83701-2636  
[m-and-m@qwestoffice.net](mailto:m-and-m@qwestoffice.net)

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