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BEFORE THE DEPARTMENT OF WATER RESOURCES

OF THE STATE OF IDAHO

IN THE MATTER OF DISTRIBUTION OF WATER TO WATER RIGHTS HELD BY MEMBERS OF THE BIG WOOD & LITTLE WOOD WATER USERS ASSOCIATION DIVERTING FROM THE BIG WOOD RIVER	CM-DC-2015-001 CM-DC-2015-002 **AMENDED NOTICE OF TAKING DEPOSITION DUCES TECUM OF JENNIFER SUKOW**
IN THE MATTER OF DISTRIBUTION OF	

WATER TO WATER RIGHTS HELD BY MEMBERS OF THE BIG WOOD & LITTLE WOOD WATER USERS ASSOCIATION DIVERTING FROM THE LITTLE WOOD RIVER

TO: JENNIFER SUKOW AND THE IDAHO DEPARTMENT OF WATER RESOURCES

PLEASE TAKE NOTICE that Counsel for the **City of Bellevue**, the **City of Hailey**, the **City of Ketchum**, the **City of Fairfield, Sun Valley Water and Sewer District**, and **Sun Valley Company** will that the testimony yon oral examination of JENNIFER SUKOW pursuant to Rule 30 of the Idaho Rules of Civil Procedure and the rules of the Idaho Department of Water Resources ("IDWR"). The deposition will take place before a court reporter and Notary Public with the firm of M&M Court Reporting Service or other duly qualified person in the above-captioned matter. Said deposition will commence at the hour of **9:00 a.m. on October 14, 2015, and continuing again at 9:00 a.m. on October 15, 2015** and thereafter until completion at the Idaho Department of Water Resources, 322 E. Front St., Boise, ID 83702, at which time and place you are notified to appear ant take part in such examination.

Pursuant to Idaho Rules of Civil Procedure 26, 30(b)(5) and 34, you are further instructed to bring to the deposition the following materials:

1. All documents, lists, maps, logs, communications or other data or information, whether in electronic or written form, and regardless of whether the document in question was originally in the custody of IDWR or any predecessor agency, the calling seniors, or any predecessors in interest to the calling seniors' water rights that relate to or contain information relating to the calling seniors' water rights.

2. All documents, lists, maps, logs, communications, drafts, notes, data and other information, whether in electronic or written form, that relate to, contain information relating to, or were reviewed in connection with preparation of the Department's Staff Memo.
3. All written policies or other instructions regarding the Wood River Valley Groundwater Flow Model.
4. All documents, lists, maps, logs, communications, drafts, notes, data and other information, whether in electronic or written form, that relate to, contain information relating to Wood River Valley Groundwater Flow Model.
5. All written instructions given by you or to you by any IDWR personnel regarding the review of calling seniors' delivery call and/or preparation of the Staff Memo.
6. All documents you reviewed in preparation for this deposition.

For purposes of this notice:

A. "Document" includes but is not limited to memoranda, notes, reports, expert reports, studies, sketches, maps, photographs, calculations, summaries, interoffice communications, plats, worksheets, ledgers, flowcharts, manuals, plans, designs, drawings, data compilations, spreadsheets and other computer analyses whether or not the document was created by IDWR or its staff.

B. "Calling senior(s)" includes the water users who are members of Big Wood & Little Wood Water Users Association.

C. "Staff Memo" is the document or documents generated and/or prepared in response to the Director's Request for Staff Memoranda, dated June 12, 2015 in the above-captioned proceedings.

DATED this 26th day of August, 2015.

Michael C. Creamer
GIVENS PURSELY, LLP
Attorneys for City of Hailey

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 20th day of August 2015, I served a true and correct copy of the above and foregoing document by placing a copy of the same in the United States mail, postage prepaid and properly addressed and by e-mail to participants who have provided e-mail addresses to the Department for service to the following:

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