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DEPARTMENT OF
WATER RESOURCES

via email

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Attorneys for Rangen, Inc.

BEFORE THE DEPARTMENT OF WATER RESOURCES

OF THE STATE OF IDAHO

IN THE MATTER OF THE MITIGATION
PLAN FILED BY THE IDAHO GROUND
WATER APPROPRIATORS FOR THE
DISTRIBUTION OF WATER TO WATER
RIGHT NOS. 36-02551 AND 36-07694 IN
THE NAME OF RANGEN, INC.

Docket No. CM-MP-2014-001

**RANGEN AND IGWA'S
STIPULATION AND JOINT
MOTION TO ALLOW DISCOVERY
IN CONNECTION WITH IGWA'S
MITIGATION PLAN**

Rangen, Inc. ("Rangen"), by and through its attorneys, and Idaho Ground Water Appropriators, Inc. ("IGWA"), by and through its attorneys, hereby stipulate and agree to allow discovery in connection with IGWA's Mitigation Plan, and jointly move Director Spackman, in accordance with Rule of Procedure 521 to enter an order authorizing discovery in connection IGWA's Mitigation Plan and incorporating the following stipulated schedule:

March 3, 2014 Deadline for Rangen to respond to IGWA's written discovery requests

March 4, 2014 Depositions
Deadline for Rangen to issue written discovery request to IGWA

March 6, 2014 Depositions

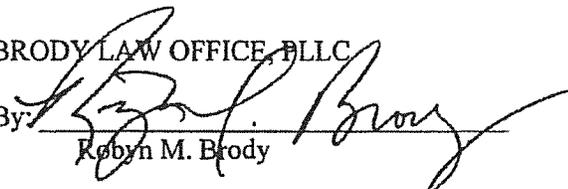
March 7, 2014 Deadline for IGWA to respond to Rangen's written discovery requests

^{AB}
March 7, 11, 2014 Depositions

March 12, 2014 Deadline to disclose exhibit lists and witness lists

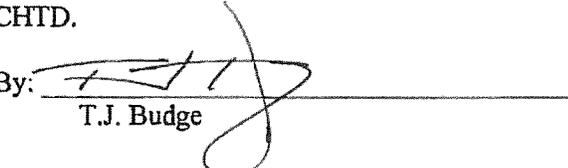
DATED this 3rd day of March, 2014.

BRODY LAW OFFICE, PLLC

By: 

Robyn M. Brody

RACINE OLSON NYE BUDGE & BAILEY,
CHTD.

By: 

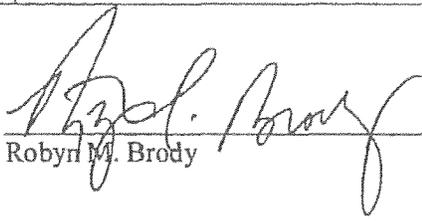
T.J. Budge

CERTIFICATE OF SERVICE

The undersigned, a resident attorney of the State of Idaho, hereby certifies that on the 3rd day of March, 2014, she caused a true and correct copy of the foregoing document to be served upon the following as indicated:

<p>Original: Director Gary Spackman Idaho Department of Water Resources P.O. Box 83720 Boise, ID 83720-0098 deborah.gibson@idwr.idaho.gov</p>	<p>Hand Delivery <input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Federal Express <input type="checkbox"/> E-Mail <input checked="" type="checkbox"/></p>
<p>Garrick Baxter Idaho Department of Water Resources P.O. Box 83720 Boise, Idaho 83720-0098 garrick.baxter@idwr.idaho.gov kimi.white@idwr.idaho.gov</p>	<p>Hand Delivery <input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Federal Express <input type="checkbox"/> E-Mail <input checked="" type="checkbox"/></p>
<p>Randall C. Budge TJ Budge RACINE, OLSON, NYE, BUDGE & BAILEY, CHARTERED 201 E. Center Street P.O. Box 1391 Pocatello, ID 83204 rcb@racinelaw.net tjb@racinelaw.net</p>	<p>Hand Delivery <input type="checkbox"/> U.S. Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Federal Express <input type="checkbox"/> E-Mail <input checked="" type="checkbox"/></p>
<p>Sarah Klahn Mitra Pemberton WHITE & JANKOWSKI Kittredge Building, 511 16th Street, Suite 500 Denver, CO 80202 sarahk@white-jankowski.com mitrap@white-jankowski.com</p>	<p>Hand Delivery <input type="checkbox"/> U.S. Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Federal Express <input type="checkbox"/> E-Mail <input checked="" type="checkbox"/></p>
<p>Dean Tranmer City of Pocatello</p>	<p>Hand Delivery <input type="checkbox"/> U.S. Mail <input type="checkbox"/></p>

P.O. Box 4169 Pocatello, ID 83201 dtranmer@pocatello.us	Facsimile <input type="checkbox"/> Federal Express <input type="checkbox"/> E-Mail <input checked="" type="checkbox"/>
John K. Simpson Travis L. Thompson Paul L. Arrington BARKER, ROSHOLT & SIMPSON, L.L.P. 195 River Vista Place, Suite 204 Twin Falls, ID 83301-3029 Facsimile: (208) 735-2444 tlt@idahowaters.com jks@idahowaters.com	Hand Delivery <input type="checkbox"/> U.S. Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Federal Express <input type="checkbox"/> E-Mail <input checked="" type="checkbox"/>
C. Thomas Arkoosh ARKOOSH LAW OFFICES 802 West Bannock, Suite 900 Boise, ID 83701 tom.arkoosh@arkoosh.com	Hand Delivery <input type="checkbox"/> U.S. Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Federal Express <input type="checkbox"/> E-Mail <input checked="" type="checkbox"/>
W. Kent Fletcher FLETCHER LAW OFFICE P.O. Box 248 Burley, ID 83318 wkf@pmt.org	Hand Delivery <input type="checkbox"/> U.S. Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Federal Express <input type="checkbox"/> E-Mail <input checked="" type="checkbox"/>
Jerry R. Rigby Hyrum Erickson Robert H. Wood RIGBY, ANDRUS & RIGBY, CHARTERED 25 North Second East Rexburg, ID 83440 jrigby@rex-law.com herickson@rex-law.com rwood@rex-law.com	Hand Delivery <input type="checkbox"/> U.S. Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Federal Express <input type="checkbox"/> E-Mail <input checked="" type="checkbox"/>



Robyn M. Brody

Gibson, Deborah

From: Robyn Brody [robynbrody@hotmail.com]
Sent: Monday, March 03, 2014 2:21 PM
To: Baxter, Garrick; White, Kimi; Gibson, Deborah; 'T. J. Budge'; 'Randy Budge'; 'Travis Thompson'; 'John Simpson'; 'Kent Fletcher'; 'Sarah Klahn'; 'Mitra Pemberton'; 'Dean Tranmer'; 'Jerry Rigby'; 'Hyrum Erickson'; 'Robert Wood'; fxb@haemlaw.com; 'Justin May'; 'Bev Halling'; ccortens@maybrowning.com
Subject: Stipulation and Joint Motion to Allow Discovery
Attachments: Stip & Joint Motion to Allow Disc. Corrected Caption.pdf

Dear All,

Attached please find IGWA and Rangen's Stipulation and Joint Motion to Allow Discovery with a corrected caption. Hard copies will be delivered to IDWR and Garrick Baxter only unless otherwise requested.

Robyn

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