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RECEIVED  
MAR 04 2014  
DEPARTMENT OF  
WATER RESOURCES

*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

**NOTICE OF TAKING  
DEPOSITION DUCES TECUM OF  
HOWARD "BUTCH" MORRIS**

**Tuesday, March 11, 2014  
9:00 a.m.**

**May, Browning & May, PLLC  
516 Hansen Street East  
Twin Falls, ID 83301**

**TO: HOWARD "BUTCH" MORRIS**

PLEASE TAKE NOTICE that Rangen, Inc., will take the deposition of Howard "Butch" Morris before a certified Court Reporter, in accordance with the Rules of Civil Procedure of the State of Idaho, on the 11<sup>th</sup> day of March, 2014, at the hour of 9:00 a.m. at the May, Browning & May, PLLC, 516 Hansen Street East, Twin Falls, ID 83301.

The Deponent is further required to identify and bring with him the following documents:

**NOTICE OF DEPOSITION DUCES TECUM OF HOWARD "BUTCH" MORRIS - 1**

1. Copies of all agreements or other documents which authorize you to use water from the Sandy Pipeline. This includes, but is not limited to, agreements between you and Northside Canal Company and/or North Snake Groundwater District.

2. Copies of all agreements between you and Northside Canal Company and/or North Snake Groundwater District and/or Idaho Groundwater Appropriators, Inc. ("IGWA").

3. Copies of all agreements entered into to settle the water delivery call made by you and the Mussers.

4. Copies of all documents which reflect communications between you and Idaho Groundwater Appropriators, Inc. and/or its attorneys. This includes, but is not limited to, letters, memos, notes of conversations and notes of meetings.

5. Copies of all documents which reflect communications between you and Northside Canal Company and/or its attorneys. This includes, but is not limited to, letters, memos, notes of conversations and notes of meetings.

6. Copies of all documents which reflect communications between you and North Snake Groundwater District and its officers or directors such as Lynn Carlquist and/or its attorneys. This includes, but is not limited to, letters, memos, notes of conversations and notes of meetings.

7. Copies of all photographs, diagrams, or sketches which show the fields where you use water diverted from the Sandy Pipeline.

8. Copies of all photographs, diagrams or sketches which show the fields where you use water diverted from the mouth of the Martin-Curren Tunnel.

9. Copies of all documents which reflect the amount of water that has been diverted from the Martin-Curren Tunnel by you.

10. Copies of all documents which pertain to the water delivery call you made with the Mussers. This request does not include correspondence between you and your attorneys.

11. Copies of all documents which reflect the amount of water that has been delivered to you via the Sandy Pipeline since it became operational. This includes, but is not limited to flow measurement records and Idaho Power Company records.

12. Copies of all documents which reflect the amount of water that has been diverted from the Sandy Pipeline for use by J. and/or Tim Musser since the Sandy Pipeline became operational.

13. Copies of all documents which reflect the amount of water that has been diverted from the Sandy Pipeline for use by Walter and/or Margaret Candy.

14. Copies of all documents which reflect the amount of water that has been diverted from the Sandy Pipeline for use by any users not identified herein.

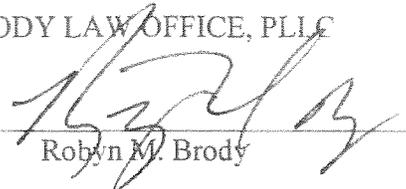
15. Any and all documents, books, papers, recordings, electronic data, emails, communications, photographs, or other documents or items reviewed in preparation for this Rule 30(b)(6) deposition.

The term "document" as used above includes, but is not limited to, notes (oral or written), memoranda, reports, studies, maps, surveys, plans, drawings, photographs, calculations, spreadsheets and any computer analyses, whether written or electronic in format.

All parties and their counsel are invited to attend. The oral examination will continue from day to day until completed.

DATED this 4<sup>th</sup> day of March, 2014.

BRODY LAW OFFICE, PLLC

By: 

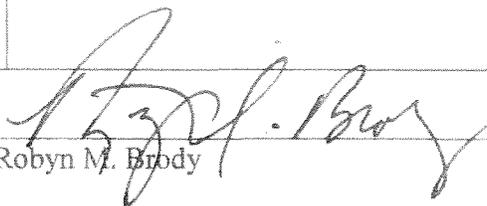
Robyn M. Brody

**CERTIFICATE OF SERVICE**

The undersigned, a resident attorney of the State of Idaho, hereby certifies that on the 4th day of March 2014, I caused a true and correct copy of the foregoing document to be served using the method indicated upon the following:

<p><b>Original:</b>                  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 type="checkbox"/>                  U.S. Mail <input checked="" 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                  chris.bromley@idwr.idaho.gov</p>	<p>Hand Delivery <input type="checkbox"/>                  U.S. Mail <input checked="" type="checkbox"/>                  Facsimile <input type="checkbox"/>                  Federal Express <input type="checkbox"/>                  E-Mail <input checked="" type="checkbox"/></p>
<p>Randall C. Budge                  Thomas J. Budge                  RACINE, OLSON, NYE, BUDGE                  &amp; BAILEY, CHARTERED                  P.O. Box 1391                  101 South Capitol Blvd, Ste 300                  Boise, ID 83704-1391                  Fax: 208-433-0167                  rcb@racinelaw.net                  cmm@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 &amp; 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.O. Box 4169                  Pocatello, ID 83201                  dtranmer@pocatello.us</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>John K. Simpson  Travis L. Thompson  Paul L. Arrington  Barker Rosholt &amp; 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</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>C. Thomas Arkoosh  ARKOOSH LAW OFFICES  802 West Bannock, Suite 900  Boise, ID 83701  tom.arkoosh@arkoosh.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>W. Kent Fletcher  Fletcher Law Office  P.O. Box 248  Burley, ID 83318  wkf@pmt.org</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>Jerry R. Rigby  Hyrum Erickson  Robert H. Wood  Rigby, Andrus &amp; Rigby, Chartered  25 North Second East  Rexburg, ID 83440  jrigby@rex-law.com  herickson@rex-law.com  rwood@rex-law.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>

  
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