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**IN THE DISTRICT COURT OF THE SIXTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO IN AND FOR THE COUNTY OF POWER**

ABERDEEN-SPRINGFIELD CANAL
COMPANY, an Idaho Corporation, JEFFREY
and CHANA DUFFIN, individually, as
stockholders, and as husband and wife,

Plaintiffs,

vs.

IDAHO DEPARTMENT OF WATER
RESOURCES, an executive department of the
State of Idaho,

Defendant.

Case No. CV-2014-165

**NOTICE OF TAKING OF 36(B)(6)
DEPOSITION DUCES TECUM**

**TUESDAY, FEBRUARY 24, 2015
9:30 a.m.**

**201 E. CENTER STREET,
POCATELLO, IDAHO**

**TO: ABERDEEN-SPRINGFIELD CANAL COMPANY, AND ITS ATTORNEYS OF
RECORD**

PLEASE TAKE NOTICE that, pursuant to Idaho Rules of Civil Procedure 30(b)(6), that
the Defendant-Intervenors, A&B Irrigation District, American Falls Reservoir District #2, Burley
Irrigation District, Minidoka Irrigation District, Milner Irrigation District, North Side Canal
Company and Twin Falls Canal Company (hereafter collectively "Surface Water Coalition,"

“Coalition” or “SWC”), will take the deposition upon oral examination of the person or persons designated by Aberdeen-Springfield Canal Company (“ASCC”) who is responsible for the use and management of so-called “recovery well” pursuant to Idaho Code § 42-228, including the well formerly owned by Plaintiffs, Jeffrey and Chana Duffin. The matters on which examination are requested include ASCC’s acquisition, use and management of “recovery wells,” policies of ASCC regarding “recovery wells,” and other matters relating to the Plaintiff-ASCC’s claims in the *Complaint* filed in the above-captioned matter.

This deposition will take place before a certified Court Reporter, in accordance with the Idaho Rules of Civil Procedure, on Tuesday, the 24th of February, 2015, at the hour of 9:30 a.m. in the Eagle Conference Room at the office of Racine Olson Nye Budge & Bailey, located at 201 E. Center Street, Pocatello, Idaho 83201.

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

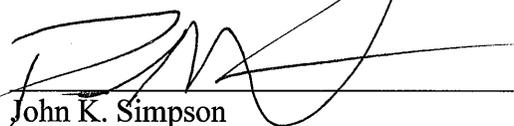
1. Any measurements, maintenance records or other documents relating to the acquisition, development and/or use of so-called “recovery wells” by ASCC.
2. Copies of any policies of relating to the acquisition, development and/or use of so-called “recovery wells” by ASCC.
3. Copies of any correspondence between ASCC and any of its shareholders and/or the Department of Water Resources relating to the acquisition, development and/or use of so-called “recovery wells” by ASCC.
4. Copies of all documents obtained or discovered that would augment, supplement or amend your answers to the discovery requests from the Coalition to you in this matter.
5. All other documents you have reviewed or will review in preparation for this 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.

The oral examination will continue from day to day until completed.

DATED this 23rd day of February, 2015.

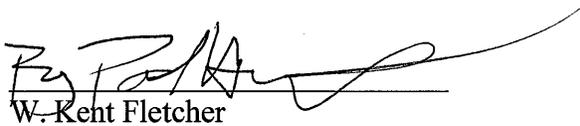
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 23rd day of February, 2015, I served true and correct copies of the foregoing upon the following by the method indicated:

Garrick Baxter
John Homan
Meghan Carter
Deputy Attorney General
Idaho Department of Water Resources
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