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Aug 13, 2026

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DEPARTMENT OF
WATER RESOURCES

Attorneys for Idaho Ground Water Appropriators, Inc. (IGWA)

STATE OF IDAHO

DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF JERRY D. AND
VALERIE H. BINGHAM'S MITIGATION
PLAN FOR THE SURFACE WATER
COALITION

Docket No. CM-MP-2026-004

**NOTICE OF WITHDRAWAL AND
SUBSTITUTION OF DECLARATION OF
ALAN JACKSON AND IGWA'S
AMENDED RESPONSE TO BINGHAMS'
MOTION FOR SUMMARY JUDGMENT**

Idaho Ground Water Appropriators, Inc. ("IGWA"), by and through counsel and on behalf of its member ground water districts, hereby gives notice that the Declaration of Alan Jackson filed on August 11, 2026, was inadvertently filed in support of IGWA's Response to Bingham's Motion to Strike Notice of Protest. The declaration was intended to be filed in support of IGWA's Response to Bingham's Motion for Summary Judgment. Concurrently herewith, IGWA is filing a corrected Declaration of Alan Jackson together with IGWA's Amended Response to Bingham's Motion for Summary Judgment. IGWA respectfully requests that the previously filed Declaration of Alan Jackson be deemed withdrawn and disregarded for purposes of the Motion to Strike Notice of Protest, and that the corrected declaration be considered in connection with the Motion for Summary Judgment.

IGWA has also filed an Amended Response to Bingham's Motion for Summary Judgment. The Amended Response supersedes and replaces IGWA's previously filed Response to Bingham's Motion for Summary Judgment in its entirety.

Dated this 13th day of August, 2026.

RACINE OLSON, PLLP

By: 

Thomas J. Budge
Attorneys for IGWA

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of August, 2026, I caused the foregoing document to be served on the persons listed below by email at the addresses indicated:


Thomas J. Budge

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