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*Attorney for the Coalition of Cities, Amalgamated
Sugar Company and McCain Foods USA, Inc.*

**BEFORE THE DEPARTMENT OF WATER RESOURCES
OF THE STATE OF IDAHO**

**IN THE MATTER OF DISTRIBUTION
OF WATER TO VARIOUS WATER RIGHTS
HELD BY OR FOR THE BENEFIT OF A&B
IRRIGATION DISTRICT, AMERICAN
FALLS RESERVOIR DISTRICT #2,
BURLEY IRRIGATION DISTRICT,
MILNER IRRIGATION DISTRICT,
MINIDOKA IRRIGATION
DISTRICT, NORTH SIDE CANAL
COMPANY, AND TWIN FALLS CANAL
COMPANY**

Docket No. CM-DC-2010-001

**DECLARATION OF CANDICE M.
MCHUGH**

I, Candice McHugh hereby declare and state as follows:

1. I am over the age of 18 and state the following based upon my own personal knowledge.
2. I am one of two owners of McHugh Bromley, PLLC, the law firm that represents the cities that make up the Coalition of Cities as their interests relate to the on-going Surface Water Coalition (“SWC”) Delivery Call and mitigation thereof. McHugh Bromley, PLLC also represents Amalgamated Sugar Company (“Amalgamated”) and McCain Foods USA, Inc. (“McCain”) in this matter.
3. McHugh Bromley, PLLC has two attorneys, Candice McHugh and Chris Bromley. We have one part-time file clerk who works 4-5 hours per week on clerical duties only.
4. I serve as the primary attorney for Amalgamated and McCain.

5. My partner, Chris Bromley, is the primary attorney for Sun Valley Company who is a party to the Supreme Court appeal in *South Valley Ground Water District and Galena Ground Water District v. Idaho Dep't of Water Resources*, Supreme Court Docket No. 49632-2022 ("Supreme Court Matter"). Oral argument in that matter is set for June 5, 2023 with Mr. Bromley set for argument. Mr. Bromley will be preparing for argument during the week of May 29, 2023.
6. I have a previously scheduled out of state obligation in Boone, North Carolina, to assist my son who is a freshman football athlete in college from June 4-8, 2023, wherein I will be travelling by air virtually all day June 4 and all day June 8, 2023.
7. Because our law firm only has two attorneys, requiring Mr. Bromley, alone to prepare for the Supreme Court argument while also having to do the bulk of the preparation for the SWC hearing on behalf of the Coalition of Cities, Amalgamated, and McCain at the same time and then represent our firm's clients in 4 days of hearing is not practical and does not allow us to fully and fairly represent Coalition of Cities, Amalgamated, and McCain.
8. After repeated requests to postpone the hearing to other dates by the junior users, IGWA, GWDs, McCain, Amalgamated, and the Cities, the Director denied their requests.
9. The hearing as currently set will not allow me to assist or attend the hearing in any meaningful manner and prejudices the interest of McHugh Bromley, PLLC's clients.

I declare under penalty of perjury under the laws of the State of Idaho that the foregoing is true and correct.

Dated this 5th, day of May, 2023.

MCHUGH BROMLEY, PLLC



Candice M. McHugh
Attorney for the Coalition of Cities

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 5th day of May, 2023, the above and foregoing, was served by email to the following:

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/s/ Candice M. McHugh
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