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Nov 13, 2025

DEPARTMENT OF
WATER RESOURCES

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Attorneys for A&B Irrigation District

**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

**NOTICE OF DEPOSITION DUCES
TECUM OF BRIAN RAGAN**

TO: Brian Ragan (IDWR) and all counsel of record

PLEASE TAKE NOTICE THAT on **Friday, November 21, 2025 beginning at 9:00 a.m.**, counsel for A&B Irrigation District will take the deposition duces tecum of BRIAN RAGAN in accordance with the *Order Granting Motion for Subpoena* (October 7, 2025) issued in this matter, IDAPA 37.01.01.520.01.a and 37.01.01.520.02, and Idaho Rules of Civil Procedure 26, 30(a), and 34, and continue from day to day thereafter until completion, via Zoom and hosted by Veritext Legal Solutions.

The Zoom information needed for this deposition is as follows:

- In your browser, go to <https://zoom.us/join>
- Enter Meeting ID: 88380356532
- Enter Password: BxW2edbIPi

The Deponent is required to produce the following to the deposition:

1. Any and all information, communications, IDWR actions related to enforcement and implementation of the May 16, 2025 *Curtailment Order* and model simulations resulting from that curtailment and/or non-curtailment of the affected junior priority ground water rights.
2. Any and all documents not produced in response to A&B's *Request for IDWR to Produce Information and Identify Witnesses* (September 19, 2025) and *the Subpoena for Production of Documents and Information—The Department of Water Resources* issued by the Hearing Officer on October 7, 2025.

DATED this 13th day of November, 2025.

PARSONS BEHLE & LATIMER



Travis L. Thompson

Attorneys for A&B Irrigation District

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of November, 2025, I served a true and correct copy of the foregoing *Notice of Deposition Duces Tecum of Brian Ragan* on the following by the method indicated:

Gerald F. Schroeder Director Mat Weaver Garrick Baxter Sarah Tschohl Megan Carter State of Idaho Dept. of Water Resources 322 E Front St. Boise, ID 83720-0098 *** service by electronic mail gerald_23107@msn.com mat.weaver@idwr.idaho.gov garrick.baxter@idwr.idaho.gov sarah.tschohl@idwr.idaho.gov meghan.carter@idwr.idaho.gov file@idwr.idaho.gov	Sarah A. Klahn Maximillian C. Bricker Somach Simmons & Dunn 1155 Canyon Blvd., Ste. 110 Boulder, CO 80302 *** service by electronic mail only sklahn@somachlaw.com vfrancisco@somachlaw.com mbricker@somachlaw.com	Skyler C. Johns Nathan M. Olsen Steven L. Taggart Olsen Taggart PLLC P.O. Box 3005 Idaho Falls, ID 83403 *** service by electronic mail only sjohns@olsentaggart.com nolsen@olsentaggart.com staggart@olsentaggart.com
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/s/ Jessica Nielsen
Jessica Nielsen
Assistant for Travis L. Thompson