

AUG 1 2 2015

DEPARTMENT OF WATER RESOURCES

CANDICE MCHUGH, ISB No. 5908 CHRIS M. BROMLEY, ISB No. 6530

MCHUGH BROMLEY, PLLC

Attorneys at Law 380 S. 4<sup>th</sup> St., Ste. 103 Boise, ID 83702

Telephone: (208) 287-0991 Facsimile: (208) 287-0864 cmchugh@mchughbromley.com cbromley@mchughbromley.com

Attorneys for City of Bellevue

SUSAN E. BUXTON, ISB No. 4041 CHERESE D. MCLAIN, ISB No. 7911 MOORE SMITH BUXTON & TURKE,

CHTD.

950 W. Bannock St., Ste. 520

Boise, ID 83702

Telephone: (208) 331-1800 Facsimile: (208) 331-1202

seb@msbtlaw.com cbm@msbtlaw.com

Attorneys for City of Ketchum and City of Fairfield

**J. EVAN ROBERTSON,** ISB No. 1801 ROBERTSON & SLETTE, PLLC

134 Third Ave. East

PO Box 1906

Twin Falls, ID 83303-1906

Telephone: (208) 933-0700 Facsimile: (208) 933-0701 erobertson@rsidaholaw.com

Attorneys for Sun Valley Water and Sewer District

SCOTT L. CAMPBELL, ISB No. 2251 MATTHEW J. MCGEE, ISB No. 7979

MOFFATT, THOMAS, BARRETT, ROCK &

FIELDS, CHARTERED

101 S. Capitol Blvd., 10th Floor

Post Office Box 829 Boise, Idaho 83701

Telephone: (208) 345-2000 Facsimile: (208) 385-5384

slc@moffatt.com mim@moffatt.com

Attorneys for Sun Valley Company

MICHAEL C. CREAMER, ISB No. 4030 MICHAEL P. LAWRENCE, ISB No. 7288

GIVENS PURSLEY, LLP

601 W. Bannock St.

P.O. Box 2720

Boise, Idaho 83701-2720

Telephone: 208-388-1200

Fax: 208-388-1300

mcc@givenspursley.com

michaellawrence@givenspursley.com

Attorneys for City of Hailey

## BEFORE THE DEPARTMENT OF WATER RESOURCES

## OF THE STATE OF IDAHO

IN THE MATTER OF DISTRIBUTION OF WATER TO WATER RIGHTS HELD BY MEMBERS OF THE BIG WOOD & LITTLE WOOD WATER USERS ASSOCIATION DIVERTING FROM THE BIG WOOD RIVER

CM-DC-2015-001

CM-DC-2015-002

NOTICE OF TAKING DEPOSITION DUCES TECUM OF JENNIFER SUKOW IN THE MATTER OF DISTRIBUTION OF WATER TO WATER RIGHTS HELD BY MEMBERS OF THE BIG WOOD & LITTLE WOOD WATER USERS ASSOCIATION DIVERTING FROM THE LITTLE WOOD RIVER

TO: JENNIFER SUKOW AND THE IDAHO DEPARTMENT OF WATER RESOURCES

PLEASE TAKE NOTICE that Counsel for the City of Bellevue, the City of Hailey, the City of Ketchum, the City of Fairfield, Sun Valley Water and Sewer District, and Sun Valley Company will that the testimony you oral examination of JENNIFER SUKOW pursuant to Rule 30 of the Idaho Rules of Civil Procedure and the rules of the Idaho Department of Water Resources ("IDWR"). The deposition will take place before a court reporter and Notary Public with the firm of M&M Court Reporting Service or other duly qualified person in the above-captioned matter. Said deposition will commence at the hour of 9:00 a.m. on September 2, 2015, and continuing again at 9:00 a.m. on September 3, 2015 and thereafter until completion at the Idaho Department of Water Resources, 6<sup>th</sup> Floor, Conference Room, 322 E. Front St., Boise, ID 83702, at which time and place you are notified to appear ant take part in such examination.

Pursuant to Idaho Rules of Civil Procedure 26, 30(b)(5) and 34, you are further instructed to bring to the deposition the following materials:

 All documents, lists, maps, logs, communications or other data or information, whether in electronic or written form, and regardless of whether the document in question was originally in the custody of IDWR or any predecessor agency, the

- calling seniors, or any predecessors in interest to the calling seniors' water rights that relate to or contain information relating to the calling seniors' water rights.
- All documents, lists, maps, logs, communications, drafts, notes, data and other
  information, whether in electronic or written form, that relate to, contain information
  relating to, or were reviewed in connection with preparation of the Department's Staff
  Memo.
- All written policies or other instructions regarding the Wood River Valley Groundwater Flow Model.
- All documents, lists, maps, logs, communications, drafts, notes, data and other information, whether in electronic or written form, that relate to, contain information relating to Wood River Valley Groundwater Flow Model.
- 5. All written instructions given by you or to you by any IDWR personnel regarding the review of calling seniors' delivery call and/or preparation of the Staff Memo.
- 6. All documents you reviewed in preparation for this deposition.

## For purposes of this notice:

- A. "Document" includes but is not limited to memoranda, notes, reports, expert reports, studies, sketches, maps, photographs, calculations, summaries, interoffice communications, plats, worksheets, ledgers, flowcharts, manuals, plans, designs, drawings, data compilations, spreadsheets and other computer analyses whether or not the document was created by IDWR or its staff.
- B. "Calling senior(s)" includes the water users who are members of Big Wood & Little Wood Water Users Association.

C. "Staff Memo" is the document or documents generated and/or prepared in response to the Director's Request for Staff Memoranda, dated June 12, 2015 in the abovecaptioned proceedings.

DATED this 11th day of August, 2015.

Candie M. McHugh

MCHUGH BROMLEY, PLLC

Attorneys for City of Bellevue

Michael C. Creamer

GIVENS PURSELY, LLP

Attorneys for City of Hailey

Scott Campbell

MOFFATT, THOMAS, BARRETT, ROCK &

FIELDS, CHARTERED

Attorneys for Sun Valley Company

TEvan Robertson

ROBERTSON & SLETTE, PLLC

Attorneys for Sun Valley Water and Sewer District

Susan Buxton,

MOORE, SMITH, BUXTON & TURKE

Attorneys for City of Ketchum and City of Fairfield

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 11<sup>th</sup> day of August 2015, I served a true and correct copy of the above and foregoing document by placing a copy of the same in the United States mail, postage prepaid and properly addressed and by e-mail to participants who have provided e-mail addresses to the Department for service to the following:

BIG WOOD WATER USERS ASSN
LITTLE WOOD WATER USERS ASSN
C/O JOSEPH F. JAMES
BROWN & JAMES
130 FOURTH AVENUE WEST
GOODING ID 83330
joe@brownjameslaw.com
dana@brownjameslaw.com

SOUTH VALLEY GROUND WATER DIST C/O ALBERT BARKER BARKER ROSHOLT & SIMPSON LLP PO BOX 2139 BOISE ID 83701-2139 apb@idahowaters.com sle@idahowaters.com

HAILEY CEMETERY MAINTENCE DIST JACOB & RUTH BLOOM C/O PATRICK D BROWN PATRICK D BROWN PC PO BOX 125 TWIN FALLS ID 83303 pat@pblaw.co

IDAHO GROUND WATER APPROPRIATORS INC

C/O RANDALL C BUDGE THOMAS J BUDGE JOSEPH G BALLSTAEDT RACINE OLSON PO BOX 1391 POCATELLO ID 83204-1391 rcb@racinelaw.net tjb@racinelaw.net jgb@racinelaw.net DIRECTOR GARY SPACKMAN IDAHO DEPARTMENT OF WATER RESOURCES PO BOX 83720 BOISE, ID 83720

STROM RANCHES INC
DENNIS STROM
C/O S BRYCE FARRIS
SAWTOOTH LAW OFFICES PLLC
PO BOX 7985
BOISE ID 83707-7985
bryce@sawtoothlaw.com

AF 2014 TRUST
GEOFFREY SMITH LLC
MARIANA S PAEN TRUST
C/O FRITZ HAEMMERLE
HAEMMERLE & HAMMERLE PLLC
PO BOX 1800
HAILEY ID 83333
fxh@haemlaw.com

ANIMAL SHELTER OF WOOD RIVER VALLEY DENNIS J CARD & MAUREEN M MCCANTY **EDWARD A LAWSON** FLYING HEART RANCH II SUBDIVISION **OWNERS ASSN** HELIOS DEVELOPMENT LLC SOUTHERN COMFORT HOMEOWNERS ASSN THE VILLAGE GREEN VCHOA C/O JAMES R LASKI HEATHER O'LEARY LAWSON LASKI CLARK & POGUE PLLC PO BOX 3310 KETCHUM ID 83340 heo@lawsonlaski.com jrl@lawsonlaski.com

WATER DISTRICT 37-B GROUNDWATER
GROUP
C/O DYLAN B LAWRENCE
VARIN WARDWELL LLC
PO BOX 1676
BOISE ID 83701-1676
dylanlawrence@varinwardwell.com

IDAHO FOUNDATION FOR PARKS AND LANDS INC C/O CHAS MCDEVITT MCDEVITT & MILLER LLP PO BOX 2564 BOISE ID 83701 chas@mcdevitt-miller.com

C/O EILEEN MCDEVITT 732 FALLS VIEW DR TWIN FALLS ID 83301 emcdevitt1@msn.com

ECCLES FLYING HAT RANCH LLC
ECCLES WINDOW ROCK RANCH LLC
HOLLY FARMS LTD
J EVAN ROBERTSON
C/O J EVAN ROBERTSON
ROBERTSON & SLETTE PLLC
PO BOX 1906
TWIN FALLS ID 83303-1906
erobertson@rsidaholaw.com

IDAHO POWER COMPANY
C/O JOHN K SIMPSON
BARKER ROSHOLT & SIMPSON LLP
PO BOX 2139
BOISE ID 83701-2139
jks@idahowaters.com
jlw@idahowaters.com

AIRPORT WEST BUSINESS PARK OWNERS
ASSN INC
AQUARIUS SAW LLC
ASPEN HOLLOW HOMEOWNERS ASSN
(ALLAN PATZER & WILLIAM
LEHMAN)
B LAMBERT TRUST (TOBY B LAMBERT)
BARBER FAMILY ASSOCIATES LP
BARRIE FAMILY PARTNERS
BELLEUE FARMS LANDOWNERS ASSN
INC

BLAINE COUNTY RECREATION DISTRICT BLAINE COUNTY SCHOOL DIST NO. 61 **CAROL BURDZY THIELEN** CHARLES & COLLEEN WEAVER **CHARLES L MATTHIESEN** CLEAR CREEK LLC CLIFFSIDE HOMEOWNERS ASSN INC COMMUNITY SCHOOL (JANELL L GODDARD) DAN S FAIRMAN MD & MELYNDA KIM STANDLEE FAIRMAN DEER CREEK FARM (LYNN CAMPION) DON R & JUDY H ATKINSON DONNA F TUTTLE TRUST ELIZABETH K GRAY F ALFREDO REGO FLOWERS BENCH LLC GOLDEN EAGLE RANCH HOA INC GREENHORN HOMEOWNERS ASSN (JEFFREY T SEELY) GRIFFIN RANCH PUD SUBDIVISION HOA (CHERI HICKS) **GRIFFIN RANCH SUBDIVISION HOA** (CHERI HICKS) **GULCH TRUST (TERESA L MASON)** HEATHERLANDS HOMEOWNERS ASSN HENRY & JANNE BURDICK **IDAHO RANCH LLC** JAMES K & SANDRA FIGGE JAMES P & JOAN CONGER KIRIL SOKOLOFF LAURA L LUCERE LINDA WOODCOCK LOUISA JANE H JUDGE **MARGO PECK** MARION R & ROBERT M ROSENTHAL MATS & SONYA WILANDER MICHAEL E WILLARD MID-VALLEY WATER CO LLC PIONEER RESIDENTIAL & RECREATIONAL PROPERTIES LLC R THOMAS GOODRICH & REBECCA LEA **PATTON** RALPH R LAPHAM RED CLIFFS HOMEOWNERS ASSOCIATION REDCLIFF PARTNERS LP (RANNEY E DRAPER) RHYTHM RANCH HOMEOWNERS ASSN RIVER ROCK RANCH LP (SHEILA WITMER) ROBERT ROHE SAGEWILLOW LLC SALIGAO LLC SANDOR & TERI SZOMBATHY STARLITE HOMEOWNERS ASSN

STONEGATE HOMEOWNERS ASSN LLC

THE ANNE L WINGATE TRUST THE BARKER LIVING TRUST THE DANIEL T MONOOGIAN REVOCABLE TRUST THE JONES TRUST THE RALPH W & KANDI L GIRTON 1999 REVOCABLE TRUST THE RESTATED MCMAHAN 1986 REVOCABLE TRUST THE VERNOY IRREVOCABLE TRUST THOMAS W WEISEL TIMBERVIEW TERRACE HOA INC C/O JAMES P SPECK SPECK & AANESTAD PO BOX 987 KETCHUM ID 83340 jim@speckandaanestad.com

DEAN R ROGERS INC (DEAN R ROGERS III) C/O LAIRD B STONE STEPHAN KVANVIG STONE & TRAINOR PO BOX 83 TWIN FALLS ID 83303-0083 sks&t@idaho-law.com

CATHERINE S DAWSON REVOCABLE
TRUST
DEER CREEK RANCH INC
ROBERT L BAKER REVOCABLE TRUST
SYRINGA RANCH LLC
C/O TRAVIS L THOMPSON
BARKER ROSHOLT & SIMPSON LLP
195 RIVER VISTA PL STE 204
TWIN FALLS ID 83301-3029
tlt@idahowaters.com

ANTHONY & JUDY D ANGELO PO BOX 3267 KETCHUM ID 83340 judydangelore@gmail.com

BARBARA CALL PO BOX 4 ROSS CA 94957 barbcall@sbcglobal.net

BERNARD I FRIEDLANDER PHD 116 VALLEY CLUB DRIVE HAILEY ID 83333 BLUEGROUSE RIDGE HOA C/O BRIAN MCCOY PO BOX 3510 KETCHUM ID 83340 brian@seabrd.net

BRIAN L SMITH & DIANE STEFFEY-SMITH PO BOX 629
BELLEVUE ID 83313
brianlamarsmith@me.com

BRITTA S HUBBARD PO BOX 1167 KETCHUM ID 83340 brittahubbard@gmail.com

BRUCE & KAREN TRUXAL PO BOX 431 BELLEVUE ID 83313 btruxal@powereng.com

CANADIAN CLUB HOMEOWNERS ASSN PO BOX 4041 KETCHUM ID 83340

COLD SPRINGS WATER COMPANY PO BOX 254 KETCHUM ID 83340

DAVID BERMAN PO BOX 1738 CAVE CREEK AZ 85327 berman.dlb@gmail.com

DOUGLAS C WALTON DIANA L WHITING 109 RIVER GROVE LN HAILEY ID 83333

ERNEST & JUDITH GETTO TRUST ERNEST J GETTO 417 ENNISBROOK DR SANTA BARBARA CA 93108

GARY HOFFMAN PO BOX 1529 KETCHUM ID 83340 GREGORY R BLOOMFIELD REVOCABLE TRUST PO BOX 757 HAILEY ID 83333

HARRY S RINKER
949 SOUTH COAST DR STE 500
COSTA MESA CA 92626
hrinker@rinkercompany.com

HARRY S RINKER PO BOX 7250 NEWPORT BEACH CA 92658 toni@rinkercompany.com

HULEN MEADOWS WATER COMPANY AND ASSN INC PO BOX 254 KETCHUM ID 83340

INNOVATIVE MITIGATION SOLUTIONS LLC 2918 N EL RANCHO PL BOISE ID 83704

JAMES D WHITE PO BOX 367 BELLEVUE ID 83313 jdwhite@q.com

JARED R WILLIAMS REVOCABLE TRUST PO BOX 99658 SEATTLE WA 98139

JIM W KOONCE PO BOX 2015 HAILEY ID 83333

KATHERINE BRECKENRIDGE B BAR B INC PO BOX 685 PICABO ID 83348 KEN SANGHA ASAM TRUST PO BOX 9200 KETCHUM ID 83340 kensangha@gmail.com

KEVIN D LAKEY WATER DISTRICT 37 107 W 1ST SHOSHONE ID 83352 watermanager@cableone.net

LAWRENCE SCHOEN 18351 US HWY 20 BELLEVUE ID 83313

LUBOFF SENAVSKY &
CHARLES TIMOTHY FLOYD
PO BOX 1240
EAGLE ID 83616
bsfloyd@mac.com

MARLYS J SCHMIDT 10901 HWY 75 BELLEVUE ID 83313 mjschmidt49@msn.com

NANCIE C TATUM & THOMAS F HENNIG PO BOX 1365 SUN VALLEY ID 83353

PAUL & POLLY CARNEY LLOYD & DEANN RICHINS MARK & SUSAN WILLIAMS FISH CREEK RESERVOIR RANCH, LLC 384 2 2900 E PAUL ID 83347

PAUL & TANA DEAN 40 FREEDOM LOOP BELLEVUE ID 83313

PETER ZACH SEWELL LORI SEWELL PO BOX 3175 HAILEY ID 83333 zlsewell@gmail.com PHILIP J VANDERHOEF KATHLEEN MCKAY 5069 HAROLD PL NE SEATTLE WA 98105

POPPY ENGLEHARDT 10965 HIGHWAY 75 BELLEVUE ID 83313

ROBERT BOUTTIER PO BOX 476 BELLEVUE ID 83313

ROBERT & JUDITH PITTMAN 121 LOWER BROADFORD RD BELLEVUE ID 83313

ROBERT J STRUTHERS 762 ROBERT ST PICABO ROUTE BELLEVUE ID 83313

RUSTY KRAMER
WATER DISTRICT 37B
PO BOX 591
FAIRFIELD ID 83327
waterdistrict37b@outlook.com

SAGE SPRINGS HOMEOWNERS ASSN INC PO BOX 254 KETCHUM ID 83340

SILVER SAGE OWNERS ASSN INC C/O CAROL'S BOOKKEEPING PO BOX 1702 KETCHUM ID 83340

STARWEATHER OWNERS ASSN INC PO BOX 254 KETCHUM ID 83340

STEVEN C FUNK 90 FREEDOM LOOP BELLEVUE ID 83313 SV RANCH LLC PO BOX 333 FAIRFIELD ID 83327 camascreek@hughes.net

THOMAS & AMY MISTICK 149 ASPEN LAKES DR HAILEY ID 83333

USDA FOREST SERVICE ATTN JAMIE GOUGH 324 25TH ST OGDEN UT 84401 jgough@fs.fed.us

VALLEY CLUB OWNERS ASSN INC PO BOX 254 KETCHUM ID 83340

WILLIAM R & KATHRYN L RATLIFFE 206 BAYHORSE RD BELLEVUE ID 83313

WOOD RIVER LAND TRUST 119 E BULLION ST HAILEY ID 83333

Michael C. Creamer