

RECEIVED

SEP 28 2015

DEPARTMENT OF WATER RESOURCES

Dylan B. Lawrence, ISB # 7136
J. Will Varin, ISB # 6981
VARIN WARDWELL LLC
242 N. 8th Street, Suite 220
P.O. Box 1676
Boise, Idaho 83701-1676
Telephone: (208) 922-7060
Facsimile: (866) 717-1758
Email: dylanlawrence@varinwardwell.com
willvarin@varinwardwell.com

Attorneys for Water Dist. 37-B Groundwater Group

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)

Docket No. CM-DC-2015-001

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)

Docket No. CM-DC-2015-002

**AFFIDAVIT OF DYLAN B.
LAWRENCE IN SUPPORT OF
RESPONSE TO JOINT MOTION
FOR STAY AND MOTION TO
COMPEL**

STATE OF IDAHO)
) ss.
COUNTY OF ADA)

Dylan B. Lawrence, who being first duly sworn under oath, deposes, avers and says:

AFFIDAVIT OF DYLAN B. LAWRENCE IN SUPPORT OF RESPONSE TO JOINT
MOTION FOR STAY AND MOTION TO COMPEL – 1 –

ORIGINAL

1. My name is Dylan Lawrence. I represent the Water Dist. 37-B Groundwater Group, an Idaho non-profit association, in these delivery call proceedings. I am of sound mind and the age of majority. I have access to the relevant documents and files, and make this affidavit based upon my own personal knowledge.

2. Attached hereto as Exhibit A is a true and correct copy of discovery requests that I served on Petitioner's counsel on or about August 4, 2015.

3. Attached hereto as Exhibit B is a true and correct copy of a letter that I sent to Petitioner's counsel on or about August 17, 2015.

4. As of the September 8, 2015 deadline for responses to the discovery requests in Exhibit A, I had not received discovery responses or a response to my correspondence in Exhibit B.

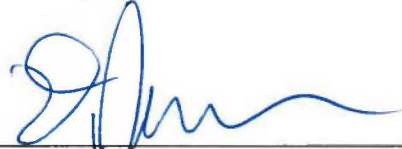
5. Attached hereto as Exhibit C is a true and correct copy of a letter that I sent to Petitioner's counsel on or about September 15, 2015.

6. Attached hereto as Exhibit D is a true and correct copy of an e-mail that I sent to Petitioner's counsel on or about September 18, 2015.

7. As of the date of this affidavit, I have not received responses to the discovery requests attached hereto as Exhibit A or responses to the correspondences attached hereto as Exhibits B, C, and D.

8. Based on the foregoing, I certify that I have in good faith attempted to confer with Petitioner's counsel in an effort to secure the responses to the discovery requests in Exhibit A without action or intervention by the Director.

RESPECTFULLY SUBMITTED this 28th day of September, 2015.



Dylan B. Lawrence

SUBSCRIBED AND SWORN to before me this 28th day of September, 2015.



Notary Public for Idaho

Residing at: Boise, Idaho

My Commission expires: June 16, 2017

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 29th day of September, 2015, I served a true and correct copy of the foregoing document to all parties listed on the Combined Certificate of Service List posted on the Department's website at <http://idwr.idaho.gov/legal-actions/delivery-call-actions/big-wood-river.html> and <http://idwr.idaho.gov/legal-actions/delivery-call-actions/little-wood-river.html> updated the 21st day of September, 2015 by the following method:

- Placing a copy of the document in the United States mail, postage prepaid and properly addressed.
- Emailing only to parties who have consented to service by email as indicated on the above-described Certificate of Service List; placing a copy of the document in the United States mail, postage prepaid and properly addressed, to parties who have not consented to service by email; and emailing to parties who provided e-mail addresses to the Department but have not consented to service by email.



Dylan B. Lawrence

EXHIBIT A

Dylan B. Lawrence, ISB # 7136
J. Will Varin, ISB # 6981
VARIN WARDWELL LLC
242 N. 8th Street, Suite 220
P.O. Box 1676
Boise, Idaho 83701-1676
Telephone: (208) 922-7060
Facsimile: (866) 717-1758
Email: dylanlawrence@varinwardwell.com
willvarin@varinwardwell.com

Attorneys for Water District 37-B Groundwater Group

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)
_____)

Docket No. CM-DC-2015-001
WATER DISTRICT 37-B
GROUNDWATER GROUP'S FIRST
SET OF INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF
DOCUMENTS TO PETITIONERS

TO: BIG WOOD & LITTLE WOOD WATER USERS ASSOCIATION AND ITS
ATTORNEYS OF RECORD:

YOU WILL PLEASE TAKE NOTICE that Water District 37-B Groundwater Group requires you to answer, under oath, the following Interrogatories and Requests for Production, in accordance with IDAPA 37.01.01.521, all provisions of Rules 26, 33, and 34 of the Idaho Rules of Civil Procedure, and the Director's May 13, 2015 Order Authorizing Discovery, by delivering verified written responses and furnishing copies of

**WATER DISTRICT 37-B GROUNDWATER GROUP'S FIRST SET OF
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO PETITIONERS- 1 -**

any responsive documents to the law offices of Varin Wardwell LLC at the address listed above.

In answering these Interrogatories, please furnish all information available to you, including information in the possession of your attorneys (and investigators, experts, etc., retained by you and your attorneys), not merely information known of your own personal knowledge.

If you cannot answer in full after exercising due diligence to secure the information to do so, answer to the extent possible, specify your inability to answer the remainder, and state whatever information and knowledge you have concerning the unanswered portion.

The Interrogatories are deemed continuing Interrogatories, and your answers thereto are to be supplemented as additional information and knowledge becomes available to you pursuant to Rule 26(e).

DEFINITIONS AND INSTRUCTIONS

“Camas Prairie” refers to the topographic feature known as the Camas Prairie Rift of Idaho, centered around Fairfield, Idaho and Camas Creek, and lying within portions of Blaine, Camas, and Elmore Counties, Idaho.

“Date” means the day, month and year, if known or ascertainable and, if not, the closest approximation that can be made.

“Document” or “Documentary” means and includes any and all tangible things and papers, whether written, recorded, graphic, typewritten, printed, photographed or otherwise produced or reproduced, and whether produced manually or by mechanical, electrical, electronic, or other artificial process or a combination of these methods, including but not limited to papers, computer records and/or files, agreements, contracts, letters, cables,

wires, notes, memoranda, correspondence, telegrams, patents, books, reports, studies, minutes, records, accounting books, maps, plans, blue prints, sketches, charts, drawings, diagrams, photographs, movies, films, computer printouts, tape recordings, information stored on computers, assignments, notebooks, ledgers, billings, statements, invoices, checks, receipts, analyses, surveys, transcriptions, recordings, analyses, studies, and things similar to any of the foregoing, regardless of their authority or origin, and however denominated by you of which you have any knowledge or information, referring, relating or pertaining in any way to the subject matters in connection with which the word is used. The term “Document” or “Documentary” includes, without limitation, originals, all file copies, and all the copies no matter how or by whom prepared and all drafts prepared in connection with such writings, whether used or not.

“IDWR” means the Idaho Department of Water Resources.

“Petitioner” refers to Big Wood & Little Wood Water Users Association, and its members, officers, agents, and/or employees for purposes of this action.

“Relate to” or “Relating to” means constituting; evidencing; reflecting; representing; supporting; contradicting; referring to; containing; mentioning; recording; noting; embodying; studying; analyzing; evaluating; relevant to; generated in anticipation of or as a result of; or relied upon, referred to, or mentioned in connection with any item or event. The terms “Relate to” or “Relating to,” as applied to a specific document, such as an agreement, deed of trust, promissory note, etc., requests that specific Document as well any Documents otherwise relating to it.

“You” or “Your” means Big Wood & Little Wood Water Users Association, together with any of its members and managers, officers, directors, counsel, consultants, experts, investigators, principals, agents, employees, representatives, volunteers, predecessors-in-interest and any other person acting on its behalf, including without limitations, any consultants, accountants, bookkeepers, and attorneys.

Terms and abbreviations not specifically defined herein shall be defined by reference to the meanings attributed to them by IDWR rules, state water resource laws, and common usage.

The Requests for Production listed below include all Documents in your possession or under your control, including Documents in the possession of your attorneys, accountants, consultants, expert witnesses or other agents or persons from whom you have a legal right to obtain such Document(s).

All of the Interrogatories and Requests herein are deemed continuing. If, after responding to these Interrogatories and Requests for Production You acquire any further information or any Documents requested herein, or any other information related to any Document herein, which is not reflected by any Documents produced or any response to these Interrogatories and Requests for Production, You must file a supplemental response or indicate to counsel for the party propounding these Interrogatories and Requests for Production of the existence of such Documents. Such supplemental response is in addition to any required by the Idaho Rules of Civil Procedure.

If any Document or any portion of any Document or any other information which is requested herein is or will be withheld from your answers to Interrogatories, from

production, inspection or copying (whether because it is claimed to be work product, communication from attorney to client, or is claimed to be entitled to be withheld for any other reason), please fully identify each such Document or portion thereof in Your response and fully state in your response the reason it is or will be withheld. In addition, if any Document is practically impossible of production, inspection or copying, please fully identify such Document and the reason for the practical impossibility.

INTERROGATORIES

INTERROGATORY NO. 1: Please identify each person who assisted You in the review and evaluation of these written discovery requests and in the preparation of Your responses thereto.

INTERROGATORY NO. 2: Please identify each expert witness You intend or expect to call at the hearing in this matter, and please include a complete statement of all opinions to be expressed and the basis and reasons therefore; the data or other information considered by the witness in forming the opinions; any exhibits to be used as a summary of or support for the opinions; any qualifications of the witness, including a list of all publications authored by the witness within the preceding ten years; the compensation to be paid for the testimony; and a listing of any other cases in which the witness has testified as an expert at trial or by deposition within the preceding four years.

INTERROGATORY NO. 3: Please identify each lay witness You intend or expect to call at the hearing in this matter, and please describe the expected scope and substance of each such witness's testimony.

INTERROGATORY NO. 4: Please explain in detail Your understanding of the mechanisms by which, and the extent to which, withdrawals of ground water occurring on the Camas Prairie affect the surface flows available to each of the Petitioners' points of diversion.

INTERROGATORY NO. 5: Please identify each and every ground water well and ground water right on the Camas Prairie that you contend materially injures the water diversions and water uses of the Petitioners.

REQUESTS FOR PRODUCTION


REQUEST FOR PRODUCTION NO. 1: Please produce copies of any Documents that You reviewed in preparing responses to these written discovery requests, that are identified in Your responses to these written discovery requests, or that otherwise support Your answers to these written discovery requests.

REQUEST FOR PRODUCTION NO. 2: Please produce copies of any reports, studies, measurements, data, or other Documents discussing, analyzing, documenting, or addressing ground water hydrology and hydrogeology within the Camas Prairie.

REQUEST FOR PRODUCTION NO. 3: Please produce copies of any reports, studies, measurements, data, or other Documents discussing, analyzing, documenting, or addressing the relationships and interactions between ground water withdrawals within the Camas Prairie and surface flows within the Big Wood River and Little Wood River.

DATED THIS 4th day of August, 2015.

Varin Wardwell LLC

By: 
Dylan B. Lawrence
Attorneys for Water District 37-B
Groundwater Group

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of August, I caused to be served a true and correct copy of the foregoing 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 addressed to the Department for service to the following:

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

RUSTY & CAROLYN BAIRD
THOMAS BECK, MD
BELLE RANCH LLC (JUSTIN AND
BRETT STEVENSON)
MIKE BORDENKIRCHER
MARGARET CLAIRE B CASEY
JULIE GARDNER & LAUREN CORD
THREE CREEKS RANCH LLC (JOHN
& KINGSLEY R CROUL)
AARON DECHEVRIEUX
STEPHANIE EISENBARTH
GRACE EAKIN
JOHN FERY MARK GATES AND
WARD WOODS (LOVING CREEK
RANCH)
POINT OF ROCKS RANCH LLC
(JOHN & ELAINE FRENCH)
ROBERT & KATHRYN GARDNER
RON HARRISON
SARAH GARDNER
PETER & TORI MADSEN
JOHN & KRISTY MOLYNEUX
THOMAS M O'GARA FAMILY
TRUST (TOM O'GARA C/O BRIAN
BARSOTTI)
PHIL PUCHNER

PICABO LIVESTOCK (NICK PURDY)
ROCKY & TERRI SHERBINE
JOHN STEVENSON
JOHN TEDESCO
MICKY & JUSTIN VANHULLE
LAKESIDE INDUSTRIES (WOOD
RIVER RANCH/SHARON LEE)
SYLVIA WOOD
PAM LARSEN
MATT & KATE GARNER
PRAIRIE SUN RANCH OWNER'S
ASSN INC (KATHY LYNN)
RICHARD SPRINGS III (DICK &
MELINDA SPRINGS)
HEART ROCK RANCH LLC (HARRY
& SHIRLEY HAGEY)
LOVING SPRINGS RANCHES LP
(GERALD B. BASHAW)
ANTELOPE SPRINGS RANCH
(ROBERT DREYER)
C/O ALBERT BARKER
BARKER ROSHOLT & SIMPSON LLP
PO BOX 2139
BOISE ID 83701-2139
apb@idahowaters.com
slc@idahowaters.com

JACOB & RUTH BLOOM
HAILEY CEMETERY MAINTENCE
DISTRICT
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

CITY OF KETCHUM
CITY OF FAIRFIELD
C/O SUSAN E BUXTON
CHERESE D MCLAIN
MOORE SMITH BUXTON & TURCKE
950 W BANNOCK ST STE 520
BOISE ID 83702
seb@msbtlaw.com
cdm@msbtlaw.com

SINCLAIR OIL CORPORATION
DBA SUN VALLEY COMPANY
C/O SCOTT L CAMPBELL
MATTHEW J MCGEE
MOFFATT THOMAS
PO BOX 829
BOISE ID 83701-0829
slc@moffatt.com

VALLEY CLUB INC
CITY OF HAILEY
C/O MICHAEL C CREAMER
GIVENS PURLSEY LLP
PO BOX 2720
BOISE ID 83701-2720
mcc@givenspursley.com

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

SOUTHERN COMFORT HOA
EDWARD A LAWSON
DENNIS J CARD & MAUREEN M
MCCANTY
ANIMAL SHELTER OF WOOD RIVER
VALLEY
HELIOS DEVELOPMENT LLC
THE VILLAGE GREEN VCHOA
FLYING HEART RANCH II
SUBDIVISION OWNERS ASSN
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

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

CITY OF BELLEVUE
MICHELLE WOLF
C/O CANDICE MCHUGH
CHRIS BROMLEY
MCHUGH BROMLEY PLLC
380 S 4th STREET STE 103
BOISE ID 83702
cmchugh@mchughbromley.com
cbromley@mchughbromley.com

HOLLY FARMS LTD
J EVAN ROBERTSON
ECCLES FLYING HAT RANCH LLC
ECCLES WINDOW ROCK RANCH
LLC
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

GREENHORN HOA
(JEFFREY T SEELY)
KIRIL SOKOLOFF
COMMUNITY SCHOOL (JANEL L
GODDARD)
DEER CREEK FARM (LYNN
CAMPION)
B LAMBERT TRUST (TOBY B
LAMBERT)
GULCH TRUST (TERESA L MASON)
WEBB LANDSCAPE INC (MARK
PALMER)
SCI PROPERTIES LLC (BRENDA A
LEVINE)
REDCLIFF PARTNERS LP (RANNEY
E DRAPER)
RED CLIFFS HOA
AQUARIUS SAW LLC
SANDOR & TERI SZOMBATHY
RIVER ROCK RANCH LP (SHEILA
WITMER)
BARBER FAMILY ASSOCIATES LP
ROBERT ROHE
GRIFFIN RANCH PUD SUBDIVISION

HOA (CHERI HICKS)
GRIFFIN RANCH SUBDIVISION HOA
(CHERI HICKS)
BLAINE COUNTY RECREATION
DISTRICT
HENRY & JANNE BURDICK
BLAINE COUNTY SCHOOL
DIST NO. 61
ASPEN HOLLOW HOA (ALLAN
PATZER & WILLIAM LEHMAN)
F ALFREDO REGO
BELLEUE FARMS LANDOWNERS
ASSN INC
CLIFFSIDE HOA
CHANEY CREEK RANCH LLC
ELIZABETH K GRAY
DONNA F TUTTLE TRUST
LINDA WOODCOCK
AIRPORT WEST BUSINESS PARK
OWNERS ASSN INC
CLEAR CREEK LLC
MID-VALLEY WATER CO LLC
THE ANNE L WINGATE TRUST
DON R & JUDY H ATKINSON
BARRIE FAMILY PARTNERS
JAMES P & JOAN CONGER
THE DANIEL T MONOOGIAN
REVOCABLE TRUST
DAN S FAIRMAN MD & MELYNDA
KIM STANDLEE FAIRMAN
FLOWERS BENCH LLC
R THOMAS GOODRICH & REBECCA
LEA PATTON
IDAHO RANCH LLC
THE JONES TRUST
LOUISA JANE H JUDGE
LAURAL LUCERE
MARGO PECK
THE RALPH W & KANDI L GIRTON
1999 REVOCABLE TRUST
THE RESTATED MCMAHAN 1986
REVOCABLE TRUST
RHYTHM RANCH HOA
MARION R & ROBERT M

ROSENTHAL
SAGEWILLOW LLC
SALIGAO LLC
CHARLES & COLLEEN WEAVER
STONEGATE HOA
THE BARKER LIVING TRUST
CAROL BURDZY THIELEN
THE VERNON IRREVOCABLE
TRUST
MATS & SONYA WILANDER
MICHAEL E WILLARD
RALPH R LAPHAM
CHARLES L MATTHIESEN PIONEER
RESIDENTIAL & RECREATIONAL
PROPERTIES LLC
THOMAS W WEISEL
JAMES K & SANDRA FIGGE
STARLITE HOA
HEATHERLANDS HOA
GOLDEN EAGLE RANCH HOA
TIMBERVIEW TERRACE HOA
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

ROBERT L BAKER REVOCABLE
TRUST
CATHERINE S DAWSON
REVOCABLE TRUST
SYRINGA RANCH LLC
DEER CREEK RANCH INC
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
25 EAGLE CREEK RD
KETCHUM ID 83340

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

CATTLE-LACK RANCH HOA
11 PURPLE SAGE LANE
BELLEVUE ID 83313
pepin1776@gmail.com

CLARE & KAREN OLSON
OKC RANCHES
PO BOX 136
HILL CITY ID 83337

COLD SPRINGS WATER COMPANY
PO BOX 254
KETCHUM ID 83340

DAVID BERMAN
PO BOX 4103
HAILEY ID 83333
berman.dlb@gmail.com

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

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

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

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

GARY HOFFMAN
PO BOX 1529
KETCHUM ID 83340

JARED R WILLIAMS
REVOCABLE TRUST
PO BOX 99658
SEATTLE WA 98139

GREGORY R BLOOMFIELD
REVOCABLE TRUST
PO BOX 757
HAILEY ID 83333

JIM W KOONCE
PO BOX 2015
HAILEY ID 83333

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

KATHERINE BRECKENRIDGE
B BARB INC
PO BOX 685
PICABO ID 83348

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

KEN SANGHA
ASAM TRUST
PO BOX 9200
KETCHUM ID 83340
kensangha@gmail.com

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

KEVIN D LAKEY
WATER DISTRICT 37
107 W 1st ST
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.net

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
zsewell@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

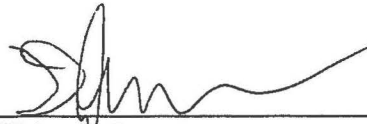
THOMAS & AMY MISTICK
149 ASPEN LAKES DR
HAILEY ID 83333

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



Dylan B. Lawrence

EXHIBIT B



ATTORNEYS AT LAW

DYLAN B. LAWRENCE
DYLANLAWRENCE@VARINWARDWELL.COM

242 N. 8TH STREET, SUITE 220
P.O. Box 1676
BOISE, IDAHO 83701
P: 208.907.1529
F: 1.866.717.1758
VARINWARDWELL.COM

August 17, 2015

VIA REGULAR MAIL

Joseph J. James
Brown & James
130 Fourth Avenue West
Gooding, Idaho 83330

Re: Big Wood & Little Wood Water Users Association Delivery Call

Dear Mr. James:

As you know, on August 4, 2015, I served the enclosed discovery requests on the Big Wood & Little Wood Water Users Association, on behalf of the Water District 37-B Groundwater Group. By now, you have probably observed that these requests are relatively short and narrowly tailored. Due to these factors, the Group and I are expecting timely responses on or before the September 8, 2015 deadline. If your client needs additional time to respond to those requests, please lodge that extension request with me as soon as it is apparent that more time will be necessary. Otherwise, we will assume we will receive timely responses.

If you have any questions or would like to discuss this further, please do not hesitate to contact me. Thank you for your attention to this matter.

Sincerely,

VARIN WARDWELL LLC

A handwritten signature in black ink, appearing to read "Dylan B. Lawrence".

Dylan B. Lawrence

Enclosure

RECEIVED

AUG 04 2015

DEPARTMENT OF
WATER RESOURCES

Dylan B. Lawrence, ISB # 7136
J. Will Varin, ISB # 6981
VARIN WARDWELL LLC
242 N. 8th Street, Suite 220
P.O. Box 1676
Boise, Idaho 83701-1676
Telephone: (208) 922-7060
Facsimile: (866) 717-1758
Email: dylanlawrence@varinwardwell.com
willvarin@varinwardwell.com

Attorneys for Water District 37-B Groundwater Group

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)
_____)

Docket No. CM-DC-2015-001

NOTICE OF SERVICE OF
DISCOVERY REQUESTS

Notice is hereby given that on the 4th day of August, 2015 I served the Water District 37-B Groundwater Group's First Set of Interrogatories and Requests for Production of Documents to Petitioners, along with a true and correct copy of this Notice of Service, by placing a copy of the same in the United States mail, postage prepaid and properly addressed to the following:

COPY

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

RUSTY & CAROLYN BAIRD
THOMAS BECK, MD
BELLE RANCH LLC (JUSTIN AND
BRETT STEVENSON)
MIKE BORDENKIRCHER
MARGARET CLAIRE B CASEY
JULIE GARDNER & LAUREN CORD
THREE CREEKS RANCH LLC (JOHN
& KINGSLEY R CROUL)
AARON DECHEVRIEUX
STEPHANIE EISENBARTH
GRACE EAKIN
JOHN FERY MARK GATES AND
WARD WOODS (LOVING CREEK
RANCH)
POINT OF ROCKS RANCH LLC
(JOHN & ELAINE FRENCH)
ROBERT & KATHRYN GARDNER
RON HARRISON
SARAH GARDNER
PETER & TORI MADSEN
JOHN & KRISTY MOLYNEUX
THOMAS M O'GARA FAMILY
TRUST (TOM O'GARA C/O BRIAN
BARSOTTI)
PHIL PUCHNER
PICABO LIVESTOCK (NICK PURDY)
ROCKY & TERRI SHERBINE
JOHN STEVENSON
JOHN TEDESCO
MICKY & JUSTIN VANHULLE
LAKESIDE INDUSTRIES (WOOD
RIVER RANCH/SHARON LEE)
SYLVIA WOOD
PAM LARSEN
MATT & KATE GARNER

PRAIRIE SUN RANCH OWNER'S
ASSN INC (KATHY LYNN)
RICHARD SPRINGS III (DICK &
MELINDA SPRINGS)
HEART ROCK RANCH LLC (HARRY
& SHIRLEY HAGEY)
LOVING SPRINGS RANCHES LP
(GERALD B. BASHAW)
ANTELOPE SPRINGS RANCH
(ROBERT DREYER)
C/O ALBERT BARKER
BARKER ROSHOLT & SIMPSON LLP
PO BOX 2139
BOISE ID 83701-2139
apb@idahowaters.com
sle@idahowaters.com

JACOB & RUTH BLOOM
HAILEY CEMETERY MAINTENANCE
DISTRICT
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

CITY OF KETCHUM
CITY OF FAIRFIELD
C/O SUSAN E BUXTON
CHERESE D MCLAIN
MOORE SMITH BUXTON & TURCKE
950 W BANNOCK ST STE 520
BOISE ID 83702
seb@msbtlaw.com
cdm@msbtlaw.com

SINCLAIR OIL CORPORATION
DBA SUN VALLEY COMPANY
C/O SCOTT L CAMPBELL
MATTHEW J MCGEE
MOFFATT THOMAS
PO BOX 829
BOISE ID 83701-0829
slc@moffatt.com

VALLEY CLUB INC
CITY OF HAILEY
C/O MICHAEL C CREAMER
GIVENS PURLSEY LLP
PO BOX 2720
BOISE ID 83701-2720
mcc@givenspursley.com

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

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

CITY OF BELLEVUE
MICHELLE WOLF
C/O CANDICE MCHUGH
CHRIS BROMLEY
MCHUGH BROMLEY PLLC
380 S 4th STREET STE 103
BOISE ID 83702
cmchugh@mchughbromley.com
cbromley@mchughbromley.com

HOLLY FARMS LTD
J EVAN ROBERTSON
ECCLES FLYING HAT RANCH LLC
ECCLES WINDOW ROCK RANCH
LLC
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

GREENHORN HOA
(JEFFREY T SEELY)
KIRIL SOKOLOFF
COMMUNITY SCHOOL (JANEL L
GODDARD)
DEER CREEK FARM (LYNN
CAMPION)
B LAMBERT TRUST (TOBY B
LAMBERT)
GULCH TRUST (TERESA L MASON)
WEBB LANDSCAPE INC (MARK
PALMER)
SCI PROPERTIES LLC (BRENDA A
LEVINE)
REDCLIFF PARTNERS LP

(RANNEY E DRAPER)
RED CLIFFS HOA
AQUARIUS SAW LLC
SANDOR & TERI SZOMBATHY
RIVER ROCK RANCH LP (SHEILA
WITMER)
BARBER FAMILY ASSOCIATES LP
ROBERT ROHE
GRIFFIN RANCH PUD SUBDIVISION
HOA (CHERI HICKS)
GRIFFIN RANCH SUBDIVISION HOA
(CHERI HICKS)
BLAINE COUNTY RECREATION
DISTRICT
HENRY & JANNE BURDICK
BLAINE COUNTY SCHOOL
DIST NO. 61
ASPEN HOLLOW HOA (ALLAN
PATZER & WILLIAM LEHMAN)
F ALFREDO REGO
BELLEUE FARMS LANDOWNERS
ASSN INC
CLIFFSIDE HOA
CHANEY CREEK RANCH LLC
ELIZABETH K GRAY
DONNA F TUTTLE TRUST
LINDA WOODCOCK
AIRPORT WEST BUSINESS PARK
OWNERS ASSN INC
CLEAR CREEK LLC
MID-VALLEY WATER CO LLC
THE ANNE L WINGATE TRUST
DON R & JUDY H ATKINSON
BARRIE FAMILY PARTNERS
JAMES P & JOAN CONGER
THE DANIEL T MONOOGIAN
REVOCABLE TRUST
DAN S FAIRMAN MD & MELYNDA
KIM STANDLEE FAIRMAN
FLOWERS BENCH LLC
R THOMAS GOODRICH & REBECCA
LEA PATTON
IDAHO RANCH LLC
THE JONES TRUST
LOUISA JANE H JUDGE
LAURAL LUCERE

MARGO PECK
THE RALPH W & KANDI L GIRTON
1999 REVOCABLE TRUST
THE RESTATED MCMAHAN 1986
REVOCABLE TRUST
RHYTHM RANCH HOA
MARION R & ROBERT M
ROSENTHAL
SAGEWILLOW LLC
SALIGAO LLC
CHARLES & COLLEEN WEAVER
STONEGATE HOA
THE BARKER LIVING TRUST
CAROL BURDZY THIELEN
THE VERNON IRREVOCABLE
TRUST
MATS & SONYA WILANDER
MICHAEL E WILLARD
RALPH R LAPHAM
CHARLES L MATTHIESEN PIONEER
RESIDENTIAL & RECREATIONAL
PROPERTIES LLC
THOMAS W WEISEL
JAMES K & SANDRA FIGGE
STARLITE HOA
HEATHERLANDS HOA
GOLDEN EAGLE RANCH HOA
TIMBERVIEW TERRACE HOA
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

ROBERT L BAKER REVOCABLE
TRUST
CATHERINE S DAWSON
REVOCABLE TRUST
SYRINGA RANCH LLC
DEER CREEK RANCH INC
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
P.O. BOX 3267
KETCHUM ID 83340

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

CATTLE-LACK RANCH HOA
11 PURPLE SAGE LANE
BELLEVUE ID 83313
pepin1776@gmail.com

CLARE & KAREN OLSON
OKC RANCHES
PO BOX 136
HILL CITY ID 83337

COLD SPRINGS WATER COMPANY
PO BOX 254
KETCHUM ID 83340

DAVID BERMAN
PO BOX 4103
HAILEY ID 83333
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 BARB 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 ST
SHOSHONE ID 83352
watermanager@cableone.net

LAWRENCE SCHOEN
18351 US HWY 20
BELLEVUE ID 83313

LUBOFF SENA VSKY & CHARLES
TIMOTHY FLOYD
PO BOX 1240
EAGLE ID 83616
bsfloyd@mac.net

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
zsewell@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

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

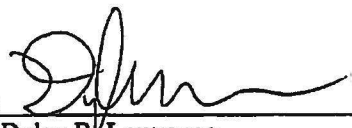
VALLEY CLUB OWNERS ASSN INC
PO BOX 254
KETCHUM ID 83340

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

WOOD RIVER LAND TRUST
119 E BULLION ST
HAILEY ID 83333

DATED THIS 4th day of August, 2015.

Varin Wardwell LLC

By: 

Dylan B. Lawrence
Attorneys for Water District 37-B
Groundwater Group

Dylan B. Lawrence, ISB # 7136
J. Will Varin, ISB # 6981
VARIN WARDWELL LLC
242 N. 8th Street, Suite 220
P.O. Box 1676
Boise, Idaho 83701-1676
Telephone: (208) 922-7060
Facsimile: (866) 717-1758
Email: dylanlawrence@varinwardwell.com
willvarin@varinwardwell.com

Attorneys for Water District 37-B Groundwater Group

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)
_____)

Docket No. CM-DC-2015-001
WATER DISTRICT 37-B
GROUNDWATER GROUP'S FIRST
SET OF INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF
DOCUMENTS TO PETITIONERS

TO: BIG WOOD & LITTLE WOOD WATER USERS ASSOCIATION AND ITS
ATTORNEYS OF RECORD:

YOU WILL PLEASE TAKE NOTICE that Water District 37-B Groundwater Group requires you to answer, under oath, the following Interrogatories and Requests for Production, in accordance with IDAPA 37.01.01.521, all provisions of Rules 26, 33, and 34 of the Idaho Rules of Civil Procedure, and the Director's May 13, 2015 Order Authorizing Discovery, by delivering verified written responses and furnishing copies of

**WATER DISTRICT 37-B GROUNDWATER GROUP'S FIRST SET OF
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO PETITIONERS- 1 -**

any responsive documents to the law offices of Varin Wardwell LLC at the address listed above.

In answering these Interrogatories, please furnish all information available to you, including information in the possession of your attorneys (and investigators, experts, etc., retained by you and your attorneys), not merely information known of your own personal knowledge.

If you cannot answer in full after exercising due diligence to secure the information to do so, answer to the extent possible, specify your inability to answer the remainder, and state whatever information and knowledge you have concerning the unanswered portion.

The Interrogatories are deemed continuing Interrogatories, and your answers thereto are to be supplemented as additional information and knowledge becomes available to you pursuant to Rule 26(e).

DEFINITIONS AND INSTRUCTIONS

“Camas Prairie” refers to the topographic feature known as the Camas Prairie Rift of Idaho, centered around Fairfield, Idaho and Camas Creek, and lying within portions of Blaine, Camas, and Elmore Counties, Idaho.

“Date” means the day, month and year, if known or ascertainable and, if not, the closest approximation that can be made.

“Document” or “Documentary” means and includes any and all tangible things and papers, whether written, recorded, graphic, typewritten, printed, photographed or otherwise produced or reproduced, and whether produced manually or by mechanical, electrical, electronic, or other artificial process or a combination of these methods, including but not limited to papers, computer records and/or files, agreements, contracts, letters, cables,

wires, notes, memoranda, correspondence, telegrams, patents, books, reports, studies, minutes, records, accounting books, maps, plans, blue prints, sketches, charts, drawings, diagrams, photographs, movies, films, computer printouts, tape recordings, information stored on computers, assignments, notebooks, ledgers, billings, statements, invoices, checks, receipts, analyses, surveys, transcriptions, recordings, analyses, studies, and things similar to any of the foregoing, regardless of their authority or origin, and however denominated by you of which you have any knowledge or information, referring, relating or pertaining in any way to the subject matters in connection with which the word is used. The term "Document" or "Documentary" includes, without limitation, originals, all file copies, and all the copies no matter how or by whom prepared and all drafts prepared in connection with such writings, whether used or not.

"IDWR" means the Idaho Department of Water Resources.

"Petitioner" refers to Big Wood & Little Wood Water Users Association, and its members, officers, agents, and/or employees for purposes of this action.

"Relate to" or "Relating to" means constituting; evidencing; reflecting; representing; supporting; contradicting; referring to; containing; mentioning; recording; noting; embodying; studying; analyzing; evaluating; relevant to; generated in anticipation of or as a result of; or relied upon, referred to, or mentioned in connection with any item or event. The terms "Relate to" or "Relating to," as applied to a specific document, such as an agreement, deed of trust, promissory note, etc., requests that specific Document as well any Documents otherwise relating to it.

“You” or “Your” means Big Wood & Little Wood Water Users Association, together with any of its members and managers, officers, directors, counsel, consultants, experts, investigators, principals, agents, employees, representatives, volunteers, predecessors-in-interest and any other person acting on its behalf, including without limitations, any consultants, accountants, bookkeepers, and attorneys.

Terms and abbreviations not specifically defined herein shall be defined by reference to the meanings attributed to them by IDWR rules, state water resource laws, and common usage.

The Requests for Production listed below include all Documents in your possession or under your control, including Documents in the possession of your attorneys, accountants, consultants, expert witnesses or other agents or persons from whom you have a legal right to obtain such Document(s).

All of the Interrogatories and Requests herein are deemed continuing. If, after responding to these Interrogatories and Requests for Production You acquire any further information or any Documents requested herein, or any other information related to any Document herein, which is not reflected by any Documents produced or any response to these Interrogatories and Requests for Production, You must file a supplemental response or indicate to counsel for the party propounding these Interrogatories and Requests for Production of the existence of such Documents. Such supplemental response is in addition to any required by the Idaho Rules of Civil Procedure.

If any Document or any portion of any Document or any other information which is requested herein is or will be withheld from your answers to Interrogatories, from

production, inspection or copying (whether because it is claimed to be work product, communication from attorney to client, or is claimed to be entitled to be withheld for any other reason), please fully identify each such Document or portion thereof in Your response and fully state in your response the reason it is or will be withheld. In addition, if any Document is practically impossible of production, inspection or copying, please fully identify such Document and the reason for the practical impossibility.

INTERROGATORIES

INTERROGATORY NO. 1: Please identify each person who assisted You in the review and evaluation of these written discovery requests and in the preparation of Your responses thereto.

INTERROGATORY NO. 2: Please identify each expert witness You intend or expect to call at the hearing in this matter, and please include a complete statement of all opinions to be expressed and the basis and reasons therefore; the data or other information considered by the witness in forming the opinions; any exhibits to be used as a summary of or support for the opinions; any qualifications of the witness, including a list of all publications authored by the witness within the preceding ten years; the compensation to be paid for the testimony; and a listing of any other cases in which the witness has testified as an expert at trial or by deposition within the preceding four years.

INTERROGATORY NO. 3: Please identify each lay witness You intend or expect to call at the hearing in this matter, and please describe the expected scope and substance of each such witness's testimony.

INTERROGATORY NO. 4: Please explain in detail Your understanding of the mechanisms by which, and the extent to which, withdrawals of ground water occurring on the Camas Prairie affect the surface flows available to each of the Petitioners' points of diversion.

INTERROGATORY NO. 5: Please identify each and every ground water well and ground water right on the Camas Prairie that you contend materially injures the water diversions and water uses of the Petitioners.

REQUESTS FOR PRODUCTION


REQUEST FOR PRODUCTION NO. 1: Please produce copies of any Documents that You reviewed in preparing responses to these written discovery requests, that are identified in Your responses to these written discovery requests, or that otherwise support Your answers to these written discovery requests.

REQUEST FOR PRODUCTION NO. 2: Please produce copies of any reports, studies, measurements, data, or other Documents discussing, analyzing, documenting, or addressing ground water hydrology and hydrogeology within the Camas Prairie.

REQUEST FOR PRODUCTION NO. 3: Please produce copies of any reports, studies, measurements, data, or other Documents discussing, analyzing, documenting, or addressing the relationships and interactions between ground water withdrawals within the Camas Prairie and surface flows within the Big Wood River and Little Wood River.

DATED THIS 4th day of August, 2015.

Varin Wardwell LLC

By: 

Dylan B. Lawrence
Attorneys for Water District 37-B
Groundwater Group

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of August, I caused to be served a true and correct copy of the foregoing 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 addressed to the Department for service to the following:

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

RUSTY & CAROLYN BAIRD
THOMAS BECK, MD
BELLE RANCH LLC (JUSTIN AND
BRETT STEVENSON)
MIKE BORDENKIRCHER
MARGARET CLAIRE B CASEY
JULIE GARDNER & LAUREN CORD
THREE CREEKS RANCH LLC (JOHN
& KINGSLEY R CROUL)
AARON DECHEVRIEUX
STEPHANIE EISENBARTH
GRACE EAKIN
JOHN FERY MARK GATES AND
WARD WOODS (LOVING CREEK
RANCH)
POINT OF ROCKS RANCH LLC
(JOHN & ELAINE FRENCH)
ROBERT & KATHRYN GARDNER
RON HARRISON
SARAH GARDNER
PETER & TORI MADSEN
JOHN & KRISTY MOLYNEUX
THOMAS M O'GARA FAMILY
TRUST (TOM O'GARA C/O BRIAN
BARSOTTI)
PHIL PUCHNER

PICABO LIVESTOCK (NICK PURDY)
ROCKY & TERRI SHERBINE
JOHN STEVENSON
JOHN TEDESCO
MICKY & JUSTIN VANHULLE
LAKESIDE INDUSTRIES (WOOD
RIVER RANCH/SHARON LEE)
SYLVIA WOOD
PAM LARSEN
MATT & KATE GARNER
PRAIRIE SUN RANCH OWNER'S
ASSN INC (KATHY LYNN)
RICHARD SPRINGS III (DICK &
MELINDA SPRINGS)
HEART ROCK RANCH LLC (HARRY
& SHIRLEY HAGEY)
LOVING SPRINGS RANCHES LP
(GERALD B. BASHAW)
ANTELOPE SPRINGS RANCH
(ROBERT DREYER)
C/O ALBERT BARKER
BARKER ROSHOLT & SIMPSON LLP
PO BOX 2139
BOISE ID 83701-2139
apb@idahowaters.com
slc@idahowaters.com

**WATER DISTRICT 37-B GROUNDWATER GROUP'S FIRST SET OF
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO PETITIONERS- 8 -**

JACOB & RUTH BLOOM
HAILEY CEMETERY MAINTENCE
DISTRICT
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

CITY OF KETCHUM
CITY OF FAIRFIELD
C/O SUSAN E BUXTON
CHERESE D MCLAIN
MOORE SMITH BUXTON & TURCKE
950 W BANNOCK ST STE 520
BOISE ID 83702
seb@msbtlaw.com
cdm@msbtlaw.com

SINCLAIR OIL CORPORATION
DBA SUN VALLEY COMPANY
C/O SCOTT L CAMPBELL
MATTHEW J MCGEE
MOFFATT THOMAS
PO BOX 829
BOISE ID 83701-0829
slc@moffatt.com

VALLEY CLUB INC
CITY OF HAILEY
C/O MICHAEL C CREAMER
GIVENS PURLSEY LLP
PO BOX 2720
BOISE ID 83701-2720
mcc@givenspursley.com

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

**WATER DISTRICT 37-B GROUNDWATER GROUP'S FIRST SET OF
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO PETITIONERS- 9 -**

SOUTHERN COMFORT HOA
EDWARD A LAWSON
DENNIS J CARD & MAUREEN M
MCCANTY
ANIMAL SHELTER OF WOOD RIVER
VALLEY
HELIOS DEVELOPMENT LLC
THE VILLAGE GREEN VCHOA
FLYING HEART RANCH II
SUBDIVISION OWNERS ASSN
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

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

CITY OF BELLEVUE
MICHELLE WOLF
C/O CANDICE MCHUGH
CHRIS BROMLEY
MCHUGH BROMLEY PLLC
380 S 4th STREET STE 103
BOISE ID 83702
cmchugh@mchughbromley.com
cbromley@mchughbromley.com

HOLLY FARMS LTD
J EVAN ROBERTSON
ECCLES FLYING HAT RANCH LLC
ECCLES WINDOW ROCK RANCH
LLC
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

GREENHORN HOA
(JEFFREY T SEELY)
KIRIL SOKOLOFF
COMMUNITY SCHOOL (JANEL L
GODDARD)
DEER CREEK FARM (LYNN
CAMPION)
B LAMBERT TRUST (TOBY B
LAMBERT)
GULCH TRUST (TERESA L MASON)
WEBB LANDSCAPE INC (MARK
PALMER)
SCI PROPERTIES LLC (BRENDA A
LEVINE)
REDCLIFF PARTNERS LP (RANNEY
E DRAPER)
RED CLIFFS HOA
AQUARIUS SAW LLC
SANDOR & TERI SZOMBATHY
RIVER ROCK RANCH LP (SHEILA
WITMER)
BARBER FAMILY ASSOCIATES LP
ROBERT ROHE
GRIFFIN RANCH PUD SUBDIVISION

**WATER DISTRICT 37-B GROUNDWATER GROUP'S FIRST SET OF
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO PETITIONERS- 10 -**

HOA (CHERI HICKS)
GRIFFIN RANCH SUBDIVISION HOA
(CHERI HICKS)
BLAINE COUNTY RECREATION
DISTRICT
HENRY & JANNE BURDICK
BLAINE COUNTY SCHOOL
DIST NO. 61
ASPEN HOLLOW HOA (ALLAN
PATZER & WILLIAM LEHMAN)
F ALFREDO REGO
BELLEUE FARMS LANDOWNERS
ASSN INC
CLIFFSIDE HOA
CHANEY CREEK RANCH LLC
ELIZABETH K GRAY
DONNA F TUTTLE TRUST
LINDA WOODCOCK
AIRPORT WEST BUSINESS PARK
OWNERS ASSN INC
CLEAR CREEK LLC
MID-VALLEY WATER CO LLC
THE ANNE L WINGATE TRUST
DON R & JUDY H ATKINSON
BARRIE FAMILY PARTNERS
JAMES P & JOAN CONGER
THE DANIEL T MONOOGIAN
REVOCABLE TRUST
DAN S FAIRMAN MD & MELYNDA
KIM STANDLEE FAIRMAN
FLOWERS BENCH LLC
R THOMAS GOODRICH & REBECCA
LEA PATTON
IDAHO RANCH LLC
THE JONES TRUST
LOUISA JANE H JUDGE
LAURAL LUCERE
MARGO PECK
THE RALPH W & KANDI L GIRTON
1999 REVOCABLE TRUST
THE RESTATED MCMAHAN 1986
REVOCABLE TRUST
RHYTHM RANCH HOA
MARION R & ROBERT M

ROSENTHAL
SAGEWILLOW LLC
SALIGAO LLC
CHARLES & COLLEEN WEAVER
STONEGATE HOA
THE BARKER LIVING TRUST
CAROL BURDZY THIELEN
THE VERNON IRREVOCABLE
TRUST
MATS & SONYA WILANDER
MICHAEL E WILLARD
RALPH R LAPHAM
CHARLES L MATTHIESEN PIONEER
RESIDENTIAL & RECREATIONAL
PROPERTIES LLC
THOMAS W WEISEL
JAMES K & SANDRA FIGGE
STARLITE HOA
HEATHERLANDS HOA
GOLDEN EAGLE RANCH HOA
TIMBERVIEW TERRACE HOA
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

ROBERT L BAKER REVOCABLE
TRUST
CATHERINE S DAWSON
REVOCABLE TRUST
SYRINGA RANCH LLC
DEER CREEK RANCH INC
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
25 EAGLE CREEK RD
KETCHUM ID 83340

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

CATTLE-LACK RANCH HOA
11 PURPLE SAGE LANE
BELLEVUE ID 83313
pepin1776@gmail.com

CLARE & KAREN OLSON
OKC RANCHES
PO BOX 136
HILL CITY ID 83337

COLD SPRINGS WATER COMPANY
PO BOX 254
KETCHUM ID 83340

DAVID BERMAN
PO BOX 4103
HAILEY ID 83333
berman.dlb@gmail.com

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

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

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

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

GARY HOFFMAN
PO BOX 1529
KETCHUM ID 83340

JARED R WILLIAMS
REVOCABLE TRUST
PO BOX 99658
SEATTLE WA 98139

GREGORY R BLOOMFIELD
REVOCABLE TRUST
PO BOX 757
HAILEY ID 83333

JIM W KOONCE
PO BOX 2015
HAILEY ID 83333

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

KATHERINE BRECKENRIDGE
B BARB INC
PO BOX 685
PICABO ID 83348

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

KEN SANGHA
ASAM TRUST
PO BOX 9200
KETCHUM ID 83340
kensangha@gmail.com

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

KEVIN D LAKEY
WATER DISTRICT 37
107 W 1st ST
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.net

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

**WATER DISTRICT 37-B GROUNDWATER GROUP'S FIRST SET OF
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO PETITIONERS- 14 -**

STARWEATHER OWNERS
ASSN INC
PO BOX 254
KETCHUM ID 83340

STEVEN C FUNK
90 FREEDOM LOOP
BELLEVUE ID 83313


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



Dylan B. Lawrence

EXHIBIT C



ATTORNEYS AT LAW

DYLAN B. LAWRENCE
DYLANLAWRENCE@VARINWARDWELL.COM

242 N. 8TH STREET, SUITE 220
P.O. Box 1676
BOISE, IDAHO 83701
P: 208.907.1529
F: 1.866.717.1758
VARINWARDWELL.COM

September 15, 2015

VIA REGULAR MAIL

Joseph J. James
Brown & James
130 Fourth Avenue West
Gooding, Idaho 83330

Re: Big Wood & Little Wood Water Users Association Delivery Call

Dear Mr. James:

It is now one week past the deadline for your client's response to the discovery requests of the Water Dist. 37-B Groundwater Group, and I have not received the responses or a request for an extension. As I indicated in my follow-up letter of August 17, those discovery requests were limited in scope and narrowly tailored, and timely responses should be achievable. In addition, you will recall that in a letter dated September 1, I requested a copy of your client's responses to the Sun Valley Company discovery requests.

Please let me know at your earliest convenience when you expect to provide these responses. If I do not receive a response by the end of this week, I will assume it will be necessary to file a motion to compel.

Thank you for your attention to this matter.

Sincerely,

VARIN WARDWELL LLC

A handwritten signature in black ink, appearing to read "Dylan B. Lawrence".

Dylan B. Lawrence

EXHIBIT D



Dylan Lawrence <dylanlawrence@varinwardwell.com>

Delivery call

1 message

Dylan Lawrence <dylanlawrence@varinwardwell.com>
To: joe@brownjameslaw.com
Bcc: Dylan Lawrence <dylanlawrence@varinwardwell.com>

Fri, Sep 18, 2015 at 2:49 PM

Joe,

I represent a group of ground water users on the Camas Prairie, who are participating in the Big Wood & Little Wood WUA delivery calls as the Water Dist. 37-B Groundwater Group. We served discovery requests on your client back on August 4, and the deadline for responses was September 8, but I haven't received any responses or extension requests.

I have reviewed the joint motion for stay that you and counsel for some of the other parties filed yesterday. While I don't oppose the stay as a general matter, given that the responses were already significantly late by the time those were filed, I still believe responses before a stay goes into effect would be appropriate. As I am sure you know, the Camas Prairie aquifer is not part of the ground water modeling effort that has been taking place with respect to the Big Wood River aquifer, and so it is particularly important for us to understand what information you are relying on when you assert that junior ground water diversions in Water District 37-B are causing material injury to the BW&LWWUA (as was asserted in the first paragraph of both the motion and the stipulation).

I really do not want to go through the time and expense of filing a motion to compel responses, but am prepared to do so before a stay goes into effect if necessary. Please contact me at your earliest convenience next week if you believe there is some basis on which you believe we can avoid that.

Thank you for your consideration.

Dylan

Dylan Lawrence

242 N. 8th Street, Ste. 220
PO Box 1676 | Boise, ID 83701
(208) 907-1529
VarinWardwell.com
<https://www.facebook.com/varinwardwell>



CONFIDENTIALITY NOTICE: This e-mail contains confidential information that is protected by the attorney-client privilege and/or work product doctrine. It is intended only for the use of the individual(s) named as recipients. If you are not the intended recipient of this e-mail, please notify the sender and please do not deliver, distribute, or copy this e-mail, disclose its contents, or take any action in reliance on the information it contains.