

Steven B. Andersen (ISB 2618)
Jennifer Reinhardt-Tessmer (ISB 7432)

KIRTON McCONKIE
11th & Idaho Building
1100 W. Idaho St., Ste. 930
Telephone: (208) 370-3325
Facsimile: (208) 370-3324
sandersen@kmclaw.com
jtessmer@kmclaw.com

RAÚL R. LABRADOR
ATTORNEY GENERAL

SCOTT L. CAMPBELL
Chief of Energy and Natural Resources Division

GARRICK L. BAXTER, ISB No. 6301
MEGHAN M. CARTER, ISB No. 8863
Deputy Attorneys General
Idaho Department of Water Resources
P.O. Box 83720
Boise, Idaho 83720-0098
Telephone: (208) 287-4800
Facsimile: (208) 287-6700
garrick.baxter@idwr.idaho.gov
meghan.carter@idwr.idaho.gov

Attorneys for Defendant

**IN THE DISTRICT COURT FOR THE FOURTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

STRIDER CONSTRUCTION CO., INC.,

Plaintiff,

vs.

IDAHO WATER RESOURCE BOARD,

Defendant.

Case No. CV01-22-10932

**MOTION TO COMPEL STRIDER TO
PRODUCE PHYSICAL EVIDENCE IN
RESPONSE TO DEFENDANT'S
SECOND SET OF REQUESTS FOR
PRODUCTION**

COMES NOW Defendant, Idaho Water Resource Board (“IWRB”), by and through its counsel of record, Kirton McConkie, and hereby respectfully moves the Court, pursuant to Idaho MOTION TO COMPEL STRIDER TO PRODUCE PHYSICAL EVIDENCE IN RESPONSE TO DEFENDANT’S SECOND SET OF REQUESTS FOR PRODUCTION- 1

Rules of Civil Procedure 26 and 37 for an order compelling Defendant to produce physical evidence in response to Defendant's Second Discovery Requests. This Motion is made on the grounds and reasons set forth in the supporting memorandum and Declaration of Jennifer Reinhardt-Tessmer, filed contemporaneously herewith.

DATED this 13th day of September 2023.

KIRTON McCONKIE

/s/ Jennifer Reinhardt-Tessmer

Jennifer Reinhardt-Tessmer

Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of September 2023, a true and correct copy of the foregoing was served by the method indicated below, and addressed to the following:

Lindsay (Taft) Watkins
Pro Hae Vice Admission Pending
Kristina Southwell
Pro Hae Vice Admission Pending
AHLERS CRESSMAN & SLEIGHT PLLC
1325 4th Ave., Suite 1850
Seattle, WA 98101
Telephone: (206) 287-9900

- U.S. Mail
- Facsimile: (208) 388-1300
- Hand Delivery
- Overnight Delivery
- iCourt E-File/Serve:
lindsay.watkins@acslawyers.com
kristina.southwell@acslawyers.com

Joe Meuleman
MEULEMAN LAW GROUP PLLC
950 W. Bannock St., Ste. 490
Boise, ID 83702
Telephone: (208) 472-0066
Attorneys for Plaintiff Strider Construction Co., Inc.

- U.S. Mail
- Facsimile:
- Hand Delivery
- Overnight Delivery
- iCourt E-File/Serve:
jmeuleman@meulemanlaw.com

Garrick L. Baxter
Meghan M. Carter
Deputy Attorneys General
Idaho Water Resource Board
P.O. Box 83720
Boise, Idaho 83720-0098
Telephone: (208) 287-4800
Attorneys for Defendant

- U.S. Mail
- Facsimile:
- Hand Delivery
- Overnight Delivery
- iCourt E-File/Serve:
garrick.baxter@idwr.idaho.gov
meghan.carter@idwr.idaho.gov

/s/ Jennifer Reinhardt-Tessmer
Jennifer Reinhardt-Tessmer