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RECEIVED  
SEP 29 2005  
Department of Water Resources

*Attorneys for Idaho Ground Water Appropriators, 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.

**IGWA'S NOTICE OF TAKING  
DEPOSITION DUCES TECUM OF RONALD  
D. CARLSON**

TO: RONALD D. CARLSON, IN HIS CAPACITY AS AN EMPLOYEE OF THE IDAHO  
DEPARTMENT OF WATER RESOURCES AND HIS ATTORNEY OF RECORD:

PLEASE TAKE NOTICE that counsel for Idaho Ground Water Appropriators, Inc.  
("IGWA") will take the testimony upon oral examination of Ronald D. Carlson pursuant to Rule  
30 and other applicable rules of the Idaho Rules of Civil Procedure. The deposition will be taken  
before a Notary Public or other duly qualified person, on **October 11, 2005 at 9:00 a.m.**, and  
continuing from day to day until completion, at the offices of the **Idaho Department of Water  
Resources, Eastern Regional Office, 900 North Skyline Dr., Idaho Falls, Idaho.**

Pursuant to Idaho Rules of Civil Procedure 26, 30(b)5 and 34, you are further instructed to bring to the deposition all documents examined, analyzed, relied upon, incorporated or utilized by you in connection with the above-captioned delivery call, in addition to all documents the reviewed by you in preparing for this deposition.

### **DEFINITIONS**

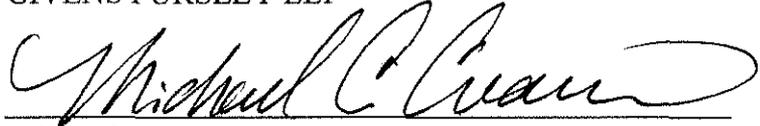
“Document” or “documents” shall mean the original, all copies and drafts of papers and writings of every kind, description and form, and all mechanical, magnetic media and electronic recordings, records, and data of every kind, description and form, and all photographs of every kind, and including, without limiting the generality of the foregoing, the following: correspondence, notes, e-mails, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, intra- or inter-office communications, reports, canceled checks, minutes, bulletins, circulars, pamphlets, telegrams, typewritten and handwritten notes, letters, instructions, work assignments, messages (including reports, notes and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, lab books, lab notes, lab journals or notebooks, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, deeds, deeds of trust, mortgages, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, feasibility studies, trusts, releases of claims, charters, certificates, licenses, leases, invoices, computer printouts or programs, summaries, précis, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded or photographed

information. Documents are to be taken as including all attachments, enclosures and other documents that are attached to, relate to or refer to such documents.

PLEASE TAKE FURTHER NOTICE that the deposition may be videotaped (recorded by video technology) and that said videotaped deposition may be used, in whole or in part, at the trial in this matter. If not completed on the date specified above, the deposition of such person or persons will be continued.

DATED this 29<sup>th</sup> day of September 2005.

GIVENS PURSLEY LLP

A handwritten signature in cursive script, reading "Michael C. Creamer", written over a horizontal line.

Jeffrey C. Fereday

Michael C. Creamer

Brad V. Sneed

*Attorneys for Idaho Ground Water Appropriators, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 29<sup>th</sup> day of September 2005, I served a true and correct copy of the foregoing by delivering it to the following individuals by the method indicated below, addressed as stated.

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