

District Court, Water Division No. 1, State of Colorado 901 9 <sup>th</sup> Avenue Greeley, Colorado 80631 (970)351-7300	DATE FILED: March 4, 2016 3:34 PM
<p><b>Plaintiff:</b> The Jim Hutton Educational Foundation</p> <p>v.</p> <p><b>Defendants:</b> Dick Wolfe, in his capacity as the Colorado State Engineer; David Nettles, in his capacity as Division Engineer in and for Water Division No. 1, State of Colorado; Colorado Division of Water Resources; Colorado Parks and Wildlife; State Board of Land Commissioners, Yuma County Water Authority Public Improvement District; Republican River Water Conservation District; City of Holyoke; City of Wray; Harvey Colglazier; Lazier Inc.; Marjorie Colglazier Trust; Mariane U. Ortner; Timothy Ortner; East Cheyenne Ground Water Management District; North Well Owners; Protect Our Local Community’s Water, LLC; Saving Our Local Economy, LLC; Tri-State Generation and Transmission Association; Don Andrews; Myrna Andrews; Nathan Andrews; David L. Dirks; Julie Dirks; Dirks Farms LTD.; Happy Creek, Inc.; J&amp;D Cattle, LLC; 4M Feeders, Inc.; May Brothers, Inc.; May Family Farms; 4M Feeders, LLC; May Acres, Inc.; Thomas R. May; James J. May; Steven D. Kramer; Kent E. Ficken; and Carlyle James as Trustee of the Chester James Trust.</p>	<b>COURT USE ONLY</b>
<i>Attorneys for Saving Our Local Economy, LLC</i> Timothy R. Buchanan, #12185 John D. Buchanan, #45191 Buchanan Sperling & Holleman PC 7703 Ralston Road Arvada, CO 80002 (303)431-9141 trb@tbvs.net; jbuchanan@tbvs.net	Case No 15CW3018
<b>26(a)(1) DISCLOSURES OF SAVING OUR LOCAL ECONOMY, LLC</b>	

Defendant, Saving Our Local Economy, LLC (“SOLE”), acting by and through its attorneys, Buchanan Sperling & Holleman PC, hereby makes the following disclosures pursuant to C.R.C.P. 26(a)(1):

**A. The name and, if known, the address and telephone number of each individual likely to have discoverable information relevant to the disputed facts alleged with particularity in the pleadings is as follows:**

1. The members of SOLE may have discoverable information relevant to disputed facts.
2. Any and all individuals identified in the Rule 26(a)(1) disclosures of the Opposers.
3. Any witness necessary to authenticate a document or to lay the foundation for any exhibit offered at trial.
4. Any and all individuals identified in discovery.
5. Any witnesses necessary for impeachment of rebuttal.

**B. Documents, data compilations, and tangible things in the possession, custody or control of SOLE that are relevant to disputed facts alleged with particularity in the pleadings, is as follows:**

1. All documents contained within the well permit records of the State Engineer for the wells owned by the members of SOLE.
2. Any and all pleadings filed in this case and exhibits/attachments filed with the Court in connection with this matter.
3. Other documents regarding disputed facts that may be within the records of the offices of the State Engineer, Division Engineer, and other public and non-public officials.
4. Any and all documents identified in discovery.

Copies of all documents listed above, which have not already been provided to the parties in this case or which are not publicly available, will be made available for inspection and copying by arrangement through the undersigned counsel.

**C. Damages.** Not applicable.

**D. Insurance agreements.** Not applicable.

**E. Privileged Information.** The following categories of information may be withheld on the basis of privilege or protection as trial preparation material:

1. Any and all documents which constitute attorney-client communications.
2. Any and all documents which constitute attorney work product.
3. Any and all documents prepared in anticipation of litigation or for trial by or for SOLE or by or for SOLE's representatives in this case or any other case.

**F. C.R.C.P. 26(e) Supplementation.** The disclosures presented herein are based upon SOLE's current understanding of the claims and issues raised in this case. As the issues and resulting claims and defenses concerning the Application are more fully developed, additional persons with knowledge or additional relevant documents may become known. Should such additional relevant information become known, SOLE will supplement the disclosures contained herein in accordance with C.R.C.P. 26(e).

Respectfully submitted this 4<sup>th</sup> day of March, 2016.

BUCHANAN SPERLING & HOLLEMAN PC

By:       /s/ John D. Buchanan        
Timothy R. Buchanan, #12185  
John D. Buchanan, #45191

ATTORNEYS FOR DEFENDANT, SAVING  
OUR LOCAL ECONOMY, LLC

*E-FILED PURSUANT TO C.R.C.P. 121  
Duly signed original on file at the law offices of Buchanan Sperling & Holleman PC*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 4<sup>th</sup> day of March, 2016, a true and correct copy of the foregoing **26(a)(1) DISCLOSURES OF SAVING OUR LOCAL ECONOMY, LLC** was electronically served via ICCES upon the following parties:

<b>Party</b>	<b>Party Type</b>	<b>Attorney</b>
4M Feeders Inc	Defendant/Opposer	Johanna Hamburger William A Paddock Carlson Hammond & Paddock LLC
4M Feeders LLC	Defendant/Opposer	Johanna Hamburger William A Paddock Carlson Hammond & Paddock LLC
Arikaree Ground Water Management District	Defendant/Opposer	David C Tausig White & Jankowski LLP Eugene J Riordan Leila C Behnampour Vranesh and Raisch
Carlyle James as Trustee of the Chester James Trust	Defendant/Opposer	Johanna Hamburger William A Paddock Carlson Hammond & Paddock LLC
Central Yuma Ground Water Management District	Defendant/Opposer	Eugene J Riordan Leila C Behnampour Vranesh and Raisch
City of Burlington	Defendant/Opposer	Alix L Joseph Steven M Nagy Burns Figa and Will PC
City of Holyoke	Defendant/Opposer	Alvin R Wall Alvin R Wall Attorney at Law
City of Wray	Defendant/Opposer	Alvin R Wall Alvin R Wall Attorney at Law
Colorado Agriculture Preservation Association	Defendant/Opposer	Bradley C Grasmick Curran A Trick Lawrence Jones Custer Grasmick LLP
Colorado Department of Natural Resources	Defendant/Opposer	Daniel E Steuer Ema Ig Schultz Preston V Hartman Colorado Attorney General

<b>Party</b>	<b>Party Type</b>	<b>Attorney</b>
Colorado Division of Water Resources	Defendant/Opposer	Daniel E Steuer Ema Ig Schultz Preston V Hartman Colorado Attorney General
Colorado Ground Water Commission	Defendant/Opposer	Chad M Wallace Patrick E Kowaleski Colorado Attorney General
Colorado Parks and Wildlife	Defendant/Opposer	Katie L Wiktor Timothy J Monahan Colorado Attorney General
Colorado State Board Land Commissioners	Defendant/Opposer	Virginia M Sciabarrasi Colorado Attorney General
David L Dirks	Defendant/Opposer	Alvin R Wall Alvin R Wall Attorney at Law
David Nettles	Defendant/Opposer	Daniel E Steuer Ema Ig Schultz Preston V Hartman Colorado Attorney General
Dick Wolfe	Defendant/Opposer	Daniel E Steuer Ema Ig Schultz Preston V Hartman Colorado Attorney General
Dirks Farms Ltd	Defendant/Opposer	Alvin R Wall Alvin R. Wall Attorney at Law
Division 1 Engineer	Division Engineer	Division 1 Water Engineer CDWR Division 1
Division 1 Water Engineer	Defendant/Opposer	Ema Ig Schultz Preston V Hartman Colorado Attorney General
Don Myrna and Nathan Andrews	Defendant/Opposer	Geoffrey M Williamson Stuart B Corbridge Vranesh and Raisch
Frenchman Ground Water Management District	Defendant/Opposer	Eugene J Riordan Leila C Behnampour Vranesh and Raisch
Happy Creek Inc	Defendant/Opposer	Johanna Hamburger William A Paddock Carlson Hammond & Paddock LLC
Harvey Colglazier	Defendant/Opposer	Alvin R Wall Alvin R Wall Attorney at Law

<b>Party</b>	<b>Party Type</b>	<b>Attorney</b>
J and D Cattle LLC	Defendant/Opposer	Johanna Hamburger William A Paddock Carlson Hammond & Paddock LLC
James J May	Defendant/Opposer	Johanna Hamburger William A Paddock Carlson Hammond & Paddock LLC
Julie Dirks	Defendant/Opposer	Alvin R Wall Alvin R Wall Attorney at Law
Kent E Ficken	Defendant/Opposer	Johanna Hamburger William A Paddock Carlson Hammond & Paddock LLC
Lazier Inc.	Defendant/Opposer	Alvin R Wall Alvin R Wall Attorney at Law
Mariane U Ortner	Defendant/Opposer	Alvin R Wall Alvin R Wall Attorney at Law
Marjorie Colglazier Trust	Defendant/Opposer	Alvin R Wall Alvin R Wall Attorney at Law
Marks Butte Ground Water Management District	Defendant/Opposer	Eugene J Riordan Leila C Behnampour Vranesh and Raisch
May Acres Inc	Defendant/Opposer	Johanna Hamburger William A Paddock Carlson Hammond & Paddock LLC
May Brothers Inc	Defendant/Opposer	Johanna Hamburger William A Paddock Carlson Hammond & Paddock LLC
May Family Farms	Defendant/Opposer	Johanna Hamburger William A Paddock Carlson Hammond & Paddock LLC
North Well Owners	Defendant/Opposer	Kimbra L Killin Russell J Sprague Colver Killin and Sprague LLP
Plains Ground Water Management District	Defendant/Opposer	Eugene J Riordan Leila C Behnampour Vranesh and Raisch
Republican River Water Conservation District	Defendant/Opposer	David W Robbins Peter J Ampe Hill and Robbins PC

<b>Party</b>	<b>Party Type</b>	<b>Attorney</b>
Sandhills Ground Water Management District	Defendant/Opposer	Eugene J Riordan Leila C Behnampour Vranesh and Raisch
State Engineer	State Engineer	Colorado Division of Water Resources CDWR
State Engineer	Defendant/Opposer	Ema IG Schultz Preston V Hartman Colorado Attorney General
Steven D Kramer	Defendant/Opposer	Johanna Hamburger William A Paddock Carlson Hammond & Paddock LLC
The Jim Hutton Educational Foundation	Plaintiff/Applicant	Karen L Henderson Steven J Bushong Porzak Browning & Bushong LLP
Thomas R May	Defendant/Opposer	Johanna Hamburger William A Paddock Carlson Hammond & Paddock LLC
Timothy E Ortner	Defendant/Opposer	Alvin R Wall Alvin R Wall Attorney at Law
Tri State Generation and Transmission Association Inc	Defendant/Opposer	Aaron S Ladd Justine C Shepherd Vranesh and Raisch Roger T Williams TriState Generation and Transmission Association Inc
Wy Ground Water Management District	Defendant/Opposer	Eugene J Riordan Leila C Behnampour Vranesh and Raisch
Yuma County Water Authority Public Improvement District	Defendant/Opposer	Dulcinea Z Hanuschak John A Helfrich Steven O Sims Brownstein Hyatt Farber Schreck LLP

/s/ Peggy Sue Wells

Peggy Sue Wells