

**Subject: Re: The Vineyard Club, Inc. Hearing**

**Date:** Monday, February 26, 2007 10:36 AM

**From:** Dan Kelly <dkelly@lawssd.com>

**To:** Matthew Bullock <MBullock@waterboards.ca.gov>

Matt:

I am filing my Notice of Intent to Appear today – and am going to call, as witnesses, each individual who initialed the "Route Slip" for the CDO and ACL. I can make an educated guess at most of the names – but don't want to jeopardize my ability to call anyone potentially involved. Can you provide me with the names of those whose initials appear on the Route Slip – or simply confirm the following?

LL (Larry Lindsay?)

MTS (Mark Stretars?)

MGB (Matthew Bullock?)

JO (John O'Hagan?)

JWK (Jim Kassel?)

VAW (Victoria Whitney?)

I doubt that I will need to call all of these people – but it appears as though they've worked on this matter on behalf of the Division. We can probably work towards eliminating some when I find out their level of involvement.

Regards,

-Dan

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**Daniel Kelly**

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On 2/23/07 5:12 PM, "Matthew Bullock" <MBullock@waterboards.ca.gov> wrote:

> Dan,  
> I double checked with staff. The only thing not in the file is a small number  
> of emails between myself and the Division which would be squarely covered by  
> attorney-client.

>  
> Regards,  
> Matt

>  
>  
>>>> Dan Kelly <dkelly@lawssd.com> 2/23/2007 11:00 AM >>>

> Matt:

>  
> Did the "file," which was comprised of two separate folders indexed  
> chronologically, include everything the SWRCB, including the enforcement  
> team, has with regard to the Vineyard Club's water right? In other words,  
> is there anything missing from the file? If anything was removed, I would  
> ask that I be provided a copy or, if a privilege is asserted with regard to  
> any material, I ask that you provide me with a privilege log.

>  
> Regards,  
> -Dan