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10 **STATE WATER RESOURCES CONTROL BOARD**

11 In the matter of Administrative Civil
12 Liability Complaint issued against Byron-
13 Bethany Irrigation District;

**DECLARATION OF S. DEAN RUIZ IN
SUPPORT OF OPPOSITION TO
REQUEST FOR PROTECTIVE ORDER**

14 In the matter of Draft Cease and Desist
15 Order issued against West Side Irrigation
16 District

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18 I S. Dean Ruiz Declare as follow:

- 19 1. I am a partner in the law firm of Harris, Perisho and Ruiz. I am one of the attorneys of
20 Record for South Delta Water Agency which is a party to the West Side Irrigation District
21 Cease and Desist Order proceeding.
- 22 2. On October 12, 2015 I participated in a conference call with the counsel for Central Delta
23 Water Agency, West Side Irrigation District, Byron Bethany Irrigation District, the
24 (“Delta Parties”) and the Prosecution Team. The purpose of the call was to meet and
25 confer with the Prosecution Team with respect to the scheduling of depositions for
26 prosecution team witnesses. At the conclusion of the call counsel for the Prosecution
27 Team stated he would provide witness availability by the close of business on October 13,
28 2015. He has not done so. Instead, on October 14, 2015 the Prosecution Team sent an

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email to all Parties objecting to the taking of depositions until after the submittal of witness testimony.

3. With the WSID matter scheduled to commence shortly, the Delta Parties were forced to commence noticing depositions for Prosecution Team witnesses. On October 15, 2015 the Delta Parties served notices of deposition for Brian Coats, Jeff Yeazel and Kathy Mrowka. The Prosecution Team's request for Protective Order followed.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct to the best of my knowledge.

Date 10-21-15



S. DEAN RUIZ