

Farwell Jensen, Jane@Waterboards

From: Tauriainen, Andrew@Waterboards
Sent: Monday, January 25, 2016 11:27 AM
To: Jeanne Zolezzi; 'Diana Martin'; Unit, Wr_Hearing@Waterboards; kharrigfeld@herumcrabtree.com; Janelle Krattiger; smorris@swc.org; dohanlon@kmtg.com; Akroyd, Rebecca@KMTG; pwilliams@westlandswater.org; Herrick, John @aol.com; jonathan.knapp@sfgov.org; McGinnis, Robin C.@DWR; dkelly@somachlaw.com; ngmplcs@pacbell.net; dantejr@pacbell.net; rjmorat@gmail.com; dean@hprlaw.net; vkincaid@olaughlinparis.com; lwood@olaughlinparis.com; red@eslawfirm.com; Jennifer Spaletta; Kuenzi, Nicole@Waterboards; Mona, Ernie@Waterboards; Buckman, Michael@Waterboards
Subject: RE: WSID Filings in ENFORCEMENT ACTION ENFO1949

WSID seeks to submit two motions to dismiss plus one motion for summary judgment, each at or near 10 pages of briefing (one of WSID's motions is 2 pages, but incorporates by reference one of BBID's proposed motions, which itself is at or near 10 pages), plus a statement of undisputed facts supporting the summary judgment motion totaling 7 pages. The Hearing Team's January 14, 2016, email provides that WSID may submit a motion to dismiss or motion for summary judgment, or a combined motion, not exceeding ten pages of total briefing. The Prosecution Team objects to WSID's attempted submittals and requests that the Hearing Team strike all but the first ten pages of WSID's total motion briefing. The Prosecution Team will rescind this request if WSID replaces the separate motions with one combined motion, not exceeding ten pages in length, before today's noon deadline.

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From: Jeanne Zolezzi [<mailto:JZOLEZZI@herumcrabtree.com>]
Sent: Monday, January 25, 2016 10:36 AM
To: 'Diana Martin'; Unit, Wr_Hearing@Waterboards; Tauriainen, Andrew@Waterboards; kharrigfeld@herumcrabtree.com; Janelle Krattiger; smorris@swc.org; dohanlon@kmtg.com; Akroyd, Rebecca@KMTG; pwilliams@westlandswater.org; Herrick, John @aol.com; jonathan.knapp@sfgov.org; McGinnis, Robin C.@DWR; dkelly@somachlaw.com; ngmplcs@pacbell.net; dantejr@pacbell.net; rjmorat@gmail.com; dean@hprlaw.net; vkincaid@olaughlinparis.com; lwood@olaughlinparis.com; red@eslawfirm.com; Jennifer Spaletta
Subject: WSID Filings in ENFORCEMENT ACTION ENFO1949

Attached please find the following documents:

1. The West Side irrigation District Motion for Summary Judgment
2. The West Side irrigation District Statement of Undisputed Material Facts
3. The West Side irrigation District Motion to Dismiss based upon Due Process

4. The West Side irrigation District Motion to Dismiss based upon Violation of APA

Jeanne M. Zolezzi



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