

RNNR_62

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**IN THE OFFICE OF THE STATE ENGINEER
OF THE STATE OF NEVADA**

IN THE MATTER OF THE DETERMINATION
OF THE RELATIVE RIGHTS IN AND TO ALL
WATERS, BOTH SURFACE AND
UNDERGROUND, LOCATED WITHIN
DIAMOND VALLEY, HYDROGRAPHIC
BASIN NO. 10-153, ELKO AND EUREKA
COUNTIES, STATE OF NEVADA.

IRA R. RENNER AND MONTIRA RENNER'S WITNESS LIST

COMES NOW, IRA R. RENNER and MONTIRA RENNER ("Renner"), by and through their counsel, PAUL G. TAGGART, ESQ. and TIMOTHY D. O'CONNOR, ESQ., of the law firm of TAGGART & TAGGART, LTD., and hereby respectfully submits their witness list and summary of witnesses' testimony as required in the January 10, 2019, Notice of Hearing on Objections.

The following are summaries of the proposed testimonies of Renner's witnesses:

1. **Ira R. Renner.** Mr. Renner is the owner of ranches in Diamond Valley, Nevada, as well as multiple vested rights associated with his ranches and surrounding areas. If called to testify, he may testify regarding historical operations of his ranches, the current operations of the ranches, spring and stream locations, meadow locations, and evidence supporting his vested right claims.

2. **Ramona Hage Morrison.** Ms. Morrison has an extensive background in ranching and conducting extensive research for ranches to determine historic ranch activities and operations in seven western states, including Nevada. If called to testify, Ms. Morrison may testify regarding her experience with title and operation research of ranches, evidence she has located regarding the Renner ranches in question, practices used to find such information including historic water use, historic ranching and agricultural practices of the Diamond Valley, Nevada, region, and vested water right information she has obtained. Ms. Morrison has drafted a report to coincide with her testimony that has been included in Renner's evidence submittal to the State Engineer. If Ms.

Morrison is permitted to testify as an expert in this matter, Ms. Morrison would likely testify about her interpretation of ancient documents, published literature about the Diamond Valley, Nevada area, and historical ranching and farming practices in the Diamond Valley, Nevada, area.

3. **George M. Thiel, P.E.** Mr. Thiel is the principal engineer of Thiel Engineer Associates Inc. Mr. Thiel has been admitted as an expert on water rights and hydrology in many State Engineer hearings and court proceedings. If called to testify, Mr. Thiel may testify regarding evidence reviewed to support Renner’s vested claims, evidence reviewed to refute findings in the State Engineer’s Preliminary Order of Determination, his opinion on the extent of the Renner vested claims, practices used to find such information including historic water use, historic ranching and agricultural practices of the Diamond Valley, Nevada, region, and the report and findings contained therein drafted by Mr. Thiel regarding the Renner ranches. Mr. Thiel has drafted a report to coincide with his testimony that has been included in Renner’s evidence submittal to the State Engineer. Mr. Thiel’s expert opinions may include interpretation of aerial photographs, maps and surveys, ancient documents, recorded documents, spring measurements and flow paths, water rights filings, duty, and published literature about the Diamond Valley, Nevada area.

4. **Terry Katzer.** Mr. Katzer is a consulting hydrogeologist. Mr. Katzer has been tendered as an expert in hydrology before the State Engineer and multiple courts in Nevada. If called to testify, he may testify regarding his personal and professional experience with the Diamond Valley, Nevada, region, his expertise in groundwater and surface water calculations and measurements, and his experience working for the United States Geological Survey in Diamond Valley, Nevada.

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Renner reserves the right to identify additional witnesses and to call any witness from the witness lists submitted by any other party.

DATED this 1 day of February, 2019.

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