

BEFORE THE OFFICE OF ADMINISTRATIVE HEARINGS  
STATE OF KANSAS

IN THE MATTER OF )  
THE APPLICATION OF THE CITIES OF )  
HAYS, KANSAS AND RUSSELL, KANSAS )  
FOR APPROVAL TO TRANSFER WATER ) OAH NO. 23AG0003 AG  
FROM EDWARDS COUNTY, KANSAS )  
PURSUANT TO THE KANSAS WATER )  
TRANSFER ACT. )  
\_\_\_\_\_ )

Pursuant to K.S.A. Chapter 77

NOTICE OF SERVICE OF DISCOVERY RESPONSES

The City of Hays, Kansas, hereby notifies the Office of Administrative Hearings that it submitted its Responses to the First Request for Production of Documents and First Request for Admissions of Water PACK and Edwards County, Kansas, to counsel for Water PACK and Edwards County, Kansas, by electronic mail, on the 1st day of June, 2023.

Respectfully submitted,

FOULSTON SIEFKIN LLP  
David M. Traster, KS #11062  
1551 N. Waterfront Parkway, Suite 100  
Wichita, KS 67206-4466  
T: 316-291-9725 | F: 316-267-6345  
[dtraster@foulston.com](mailto:dtraster@foulston.com)

and

Daniel J. Buller, KS #25002  
7500 College Boulevard, Suite 1400  
Overland Park, KS 66210-4041  
T: 913-253-2179 | F: 866-347-9613  
[dbuller@foulston.com](mailto:dbuller@foulston.com)

and

Donald F. Hoffman, KS #09502  
[donhoff@eaglecom.net](mailto:donhoff@eaglecom.net)

and

Melvin J. Sauer, Jr., KS #14638  
[melsauer@eaglecom.net](mailto:melsauer@eaglecom.net)  
DREILING, BIEKER & HOFFMAN, LLP  
111 W. 13th Street  
P.O. Box 579  
Hays, KS 67601-0579  
T: 785-625-3537 | F: 785-625-8129

By: /s/ David M. Traster  
David M. Traster, KS #11062  
*Attorneys for the City of Hays, Kansas*

### CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing Notice of Service of Discovery Responses was served by uploading it to OAH Case No. 23AG0003, which will send notice by electronic mail to the following:

Lynn D. Preheim  
[lynn.preheim@stinson.com](mailto:lynn.preheim@stinson.com)  
Christina J. Hansen  
[christina.hansen@stinson.com](mailto:christina.hansen@stinson.com)  
STINSON LLP  
1625 N. Waterfront Parkway, Suite 300  
Wichita, KS 67206  
*Attorneys for the Big Bend Groundwater  
Management District No. 5*

Stephanie A. Kramer, Chief Counsel

[Stephanie.Kramer@ks.gov](mailto:Stephanie.Kramer@ks.gov)

Kate S. Langworthy, Staff Attorney

[Kate.Langworthy@ks.gov](mailto:Kate.Langworthy@ks.gov)

Kansas Department of Agriculture

1320 Research Park Drive

Manhattan, KS 66502

*Attorneys for the Kansas Department of Agriculture*

Charles D. Lee

[cle@leeschwalb.com](mailto:cle@leeschwalb.com)

Myndee M. Lee

[mlee@leeschwalb.com](mailto:mlee@leeschwalb.com)

P.O. Box 26054

Overland Park, KS 66225

and

Micah Schwalb

[mschwalb@leeschwalb.com](mailto:mschwalb@leeschwalb.com)

Lee Schwalb

4450 Arapahoe Avenue, Suite 100

Boulder, CO 80303

*Attorneys for Water PACK*

Mark Frame

[framelaw@yahoo.com](mailto:framelaw@yahoo.com)

P.O. Box 37

Kinsley, KS 67547

*Attorney for Edwards County*

/s/David M. Traster

David M. Traster, KS #11062