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**STATE OF KANSAS
BEFORE THE DIVISION OF WATER RESOURCES
KANSAS DEPARTMENT OF AGRICULTURE**

**In the Matter of the City of Wichita's
Phase II Aquifer Storage and Recovery Project
In Harvey and Sedgwick Counties, Kansas**

Case No. 18 WATER 14014

Pursuant to K.S.A. 82a-1901 and K.A.R. 5-14-3a.

**RESPONSE TO DWR'S MOTION TO SUSPEND DISCOVERY DEADLINE AND THE
OBLIGATION OF DWR TO ANSWER GMD2'S WRITTEN DISCOVERY**

COMES NOW the Equus Beds Groundwater Management District, Number 2


(hereinafter "the District"), by and through its attorneys, Thomas A. Adrian and David J. Stucky of Adrian & Pankratz, P.A., with its response to the DWR'S Motion to Suspend Discovery Deadline and the Obligation of DWR to Answer GMD2's Written Discovery, as follows:

1. DWR's position to suspend discovery until a new scheduling order is determined seems like a reasonable request.
2. Although this request is already the subject of prior motions, the District is similarly asking that its need to respond to any pending discovery also be suspended pursuant to the same timelines.
3. To the extent that the agency is lending support to the City's attempt to remove the District as a party, this request is adamantly opposed.

WHEREFORE, the District asks that it be given an extension of time to answer the City's discovery, for a mutual extension on the discovery deadlines in this case for all parties, for an

extension of the hearing date, that the District remain a party to these proceedings, and for such other relief as the Chief Engineer deems just and equitable.

RESPECTFULLY SUBMITTED,

A handwritten signature in blue ink, appearing to be 'T. Adrian', is written over a horizontal line.

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Attorneys for Equus Beds Groundwater
Management District Number 2

CERTIFICATE OF FILING AND SERVICE


We, Thomas A. Adrian and David J. Stucky, do hereby certify that a true and correct copy of the above was served by () mail, postage prepaid and properly addressed by depositing the same in the U.S. mail; () fax; (X) email; and/or () hand delivery on the 14th day of September, 2018, to:

Aaron Oleen
Division of Water Resources
Oleen, Aaron [KDA] <Aaron.Oleen@ks.gov>

Brian K. McLeod
City of Wichita
McLeod, Brian <BMcLeod@wichita.gov>

and the original sent by () mail, () fax, (x) email, and/or () electronically filed to/with:

State of Kansas
Diviosn of Water Resources
Department of Agriculture
Titus, Kenneth [KDA] Kenneth.Titus@ks.gov
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