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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) Case No. 18 Water 14014
In Harvey and Sedgwick Counties, Kansas.)

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

MOTION TO COMPEL TO THE CITY OF WICHITA

COMES NOW the Equus Beds Groundwater Management District Number 2 (hereinafter "the District"), by and through counsel Thomas A. Adrian of Adrian & Pankratz, P.A., Leland Rolfs of Leland Rolfs Consulting, and David Stucky, with its Motion to Compel to the City of Wichita. In support of said Motion, Movant states as follows:

1. The District has previously submitted discovery to the City of Wichita (hereinafter "the City"). The City's answers to the District's written discovery is attached as Exhibit A.
2. The City sent a Privilege Log contemporaneous with its answers to the District's written discovery requests. The Privilege Log is attached as Exhibit B.
3. The District previously sent a Golden Rule letter to the City. The Golden Rule letter is attached as Exhibit C.
4. Rather than initially filing a Motion to Compel, the District revised its discovery requests to try and address the City's objections. The City subsequently answered the District's second round of discovery requests.

5. However, most of the District's concerns, enumerated in the original Golden Rule letter sent by District, remain.
6. The City, by engaging in an elaborate game of word parsing, found reason not to answer many of the District's interrogatories or requests for admission. This is outlined in the Golden Rule letter. The City should be ordered to properly answer this written discovery.
7. The District is further asking for the City to enumerate all ex parte communications the City has had with the Chief Engineer regarding the subject matter of this hearing.

WHEREFORE, the District respectfully prays for the Chief Engineer to enter an order compelling the City to fully answer the District's discovery requests, for payment of the District's attorney fees in preparing and arguing this Motion, and such other and further relief as the Chief Engineer deems just and equitable.

RESPECTFULLY SUBMITTED,



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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 11th day of March, 2019, to:

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

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