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SCOTT K. KUNEY, Esq., SBN 111115  
ERNEST A. CONANT, Esq., SBN 089111  
THE LAW OFFICES OF YOUNG WOOLDRIDGE, LLP  
1800 30<sup>th</sup> Street, Fourth Floor  
Bakersfield, CA 93301  
Telephone: (661) 327-9661  
Facsimile: (661) 327-0720

Attorneys for WDS California II, LLC

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES**

Coordination Proceeding  
Special Title (Rule 1550(b))

**ANTELOPE VALLEY  
GROUNDWATER CASES**

Included Actions:

Los Angeles County Waterworks District  
No. 40 v. Diamond  
FARMING/IRRIGATION Co.  
Superior Court of California  
County of Los Angeles, Case No. BC  
325201

Los Angeles County Waterworks District  
No. 40 v. Diamond  
FARMING/IRRIGATION Co.  
Superior Court of California, County of  
Kern, Case No. S-1500-CV 254348

Wm. Bolthouse Farms, Inc. v. City of  
Lancaster Diamond  
FARMING/IRRIGATION Co. v. City of  
Lancaster Diamond  
FARMING/IRRIGATION Co. v. Palmdale  
Water Dist. Superior Court of California,  
County of Riverside, consolidated actions,  
Case Nos. RIC 353840, RIC 344436, RIC  
344668

Judicial Council Coordination Proceeding  
No. 4408

SC Case No. 105CV 049053  
Assigned to Hon. Jack Komar

**WDS CALIFORNIA II, LLC'S FIRST  
SUPPLEMENTAL IDENTIFICATION OF  
NON-EXPERT WITNESSES PURSUANT  
TO CASE MANAGEMENT ORDER**

**Date of Exchange: January 4, 2013  
Trial Date: February 11, 2013**

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TO ALL PARTIES IN INTEREST:

NOTICE IS HEREBY GIVEN that WDS CALIFORNIA II, LLC (hereinafter "WDS") designates the following non-expert witnesses it may call at trial in the above-entitled action to offer non-expert opinions based on their personal observations and experience related to WDS's current groundwater production for the calendar year 2011 and January 1 through November 30, 2012, and proof of claimed reasonable and beneficial use of water for each parcel to be adjudicated:

**NON- EXPERT WITNESSES**

1. David Dorrance  
Western Development & Storage  
5700 Wilshire Blvd., Ste. 330  
Los Angeles, CA 90036

David Dorrance is available for deposition during January 10-31, 2013, except for the following dates: January 15, 17, 29, 31, 2013.

2. Andrew Werner  
Western Development & Storage  
5700 Wilshire Blvd., Ste. 330  
Los Angeles, CA 90036

Andrew Werner is available for deposition during January 10-31, 2013, except for the following dates: January 10, 11, 15, 17, 29, 31, 2013.

3. Carl F. Voss, Jr.  
c/o LeBeau Thelen, LLP  
5001 East Commerce Center Drive  
Bakersfield, CA 93309

Our understanding is Mr. Voss is available for deposition on January 10, 2013.

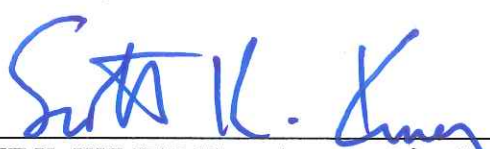
WDS also designates any witness whose testimony may be regarded as non-expert whose name has been revealed by discovery or further discovery in this action, and those non-experts who may be designated by other parties to this action.

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WDS also reserves its rights and all other constitutional, statutory and/or common law rights it may have, to name other non-experts before trial or to call to testify at trial non-experts not named, whose testimony is needed to aid in the prosecution of this action and/or refute and rebut the contentions and testimony of any other non-expert.

Dated: January 7, 2013

THE LAW OFFICES OF YOUNG WOOLDRIDGE, LLP

By:   
SCOTT K. KUNEY, Esq., Attorneys for Cross-Defendant WDS CALIFORNIA II, LLC

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**PROOF OF SERVICE**

STATE OF CALIFORNIA, COUNTY OF KERN

I, ERIN L. LINDSEY, declare: I am and was at the times of the service hereunder mentioned, over the age of eighteen (18) years, and not a party to the within cause. My business address is 1800 30th Street, Fourth Floor, Bakersfield, CA 93301.

On January 8, 2013, I caused the below listed document(s) entitled as: **WDS CALIFORNIA LLC'S FIRST SUPPLEMENTAL IDENTIFICATION OF NON-EXPERT WITNESSES PURSUANT TO CASE MANAGEMENT ORDER** to be served on the parties via the following service:

X (BY POSTING) I posted the document listed above to the Santa Clara Superior Court website regarding the Antelope Valley Groundwater matter pursuant to the Court's Clarification Order. Electronic service posting completed through [www.scefilng.org](http://www.scefilng.org).

X (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on January 8, 2013, at Bakersfield, California.

  
ERIN L. LINDSEY