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8 Attorneys for Cross-Defendant Anaverde LLC

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 COUNTY OF LOS ANGELES, CENTRAL DISTRICT

11
12 ANTELOPE VALLEY GROUNDWATER
CASES

13 Included Actions:

14 Los Angeles County Waterworks District No.
15 40 v. Diamond Farming Co.
Superior Court of California
16 County of Los Angeles, Case No. BC325201;

17 Los Angeles County Waterworks District No.
18 40 v. Diamond Farming Co.
Superior Court of California
19 County of Kern, Case No. S-1500-CV-254-
348;

20 Wm. Bolthouse Farms, Inc. v. City of
Lancaster
21 Diamond Farming Co. v. City of Lancaster
Diamond Farming Co. v. Palmdale Water Dist.
22 Superior Court of California
County of Riverside, consolidated actions
23 Case Nos. RIC 353840, RIC 344436,
RIC 344668.

Judicial Council Coordination Proceeding No.
4408

Santa Clara Case No. 1-05-CV-049053

Assigned to the Honorable Jack Komar
Dept. 1

**DISCLOSURE OF EXPERT WITNESS BY
CROSS-DEFENDANT ANAVERDE LLC;
EXPERT WITNESS DECLARATION OF
KIMBERLY A. HUANGFU**

Phase 2 Trial: October 6, 2008

[Code Civ. Pro., §§2034.210, 2034.220,
2034.230, 2304.60]

1 **TO ALL PARTIES TO THIS ACTION, AND TO THEIR ATTORNEYS OF RECORD:**

2 Pursuant to this Court's June 25, 2008 Minute Order and California Code of Civil
3 Procedure, section 2034.210, *et seq.*, Cross-Defendant Anaverde LLC ("Anaverde") hereby
4 discloses the names and addresses of each person whose expert opinion it expects to offer in
5 evidence at the trial of this matter:

6 **John M. Lambie, Principal Groundwater Hydrologist, e-pur, LLC,**
7 **4061 SW Chesapeake Avenue, Portland, Oregon 97239-1341.**


8 In addition, Anaverde reserves the right to call additional witnesses at the time of trial or
9 hearing, including but not limited to the right to call any expert witness identified by any of the
10 other parties to this litigation.

11 Anaverde also reserves the right to call in rebuttal any expert witness on issues which have
12 not yet been disclosed by discovery, as well as the right to designate further experts prior to this
13 trial or hearing pursuant to Code of Civil Procedure § 2034.280.

14 Anaverde further reserves the right to call in as a witness at trial any expert not previously
15 designated for impeachment purposes pursuant to Code of Civil Procedure § 2034.310.

16
17
18 DATED: August 15, 2008

Respectfully submitted,

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21 KIMBERLY A. HUANGFU
22 LEWIS BRISBOIS BISGAARD & SMITH LLP
23 Attorneys for Cross-Defendant ANAVERDE LLC
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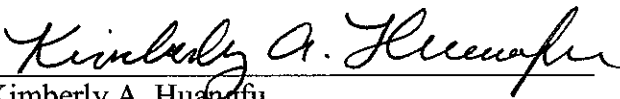
1 distinction from the Antelope Valley Adjudication Basin. This includes, but is not limited to, the
2 issue of sub-basins that are separate and distinct from the overall Antelope Valley Adjudication
3 Basin.

4 6. This declaration represents that Mr. Lambie has agreed to testify at the trial regarding
5 Phase 2 issues, and is sufficiently familiar with the pending action to submit a meaningful oral
6 deposition concerning the specific testimony, including any opinion and its basis, that Mr. Lambie
7 is expected to give at trial.

8 7. Pursuant to Code of Civil Procedure section 2034.260, subd. (c)(5), Mr. Lambie's hourly
9 fee for deposition testimony \$2,460 per 8-hour day with an hourly rate of \$307.50 per hour for
10 additional time . Mr. Lambie's rate for consultation for this matter is \$205.00 per hour.

11 8. I declare under penalty of perjury under the laws of the State of California that the
12 foregoing is true and correct.

13 Executed on August 15, 2008 at Los Angeles, California.
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16 Kimberly A. Huangfu

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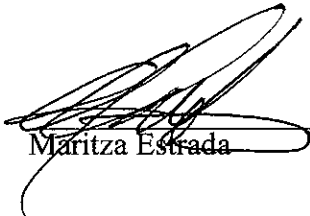
PROOF OF SERVICE

I declare that:

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen years and not a party to the within action. My business address is 221 North Figueroa Street, Suite 1200, Los Angeles, California 90012.

On August 15, 2008, I served **DISCLOSURE OF EXPERT WITNESS BY CROSS-DEFENDANT ANAVERDE LLC; EXPERT WITNESS DECLARATION OF KIMBERLY A. HUANGFU** by posting the document(s) listed above to the Santa Clara Superior Court website in regard to the Antelope Valley Groundwater matter.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct, executed on August 15, 2008.



Maritza Estrada