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7 Attorneys for ANAVERDE LLC

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **COUNTY OF SANTA CLARA**

10 **ANTELOPE VALLEY GROUNDWATER**  
11 **CASES:**

12 Included Actions:

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

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

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

Judicial Council Coordination  
Proceeding No. 4408

Santa Clara Case No. 1-05-CV-049053  
Assigned to the Honorable Jack Komar

**ANAVERDE LLC'S AMENDED EXHIBIT LIST**

Phase 2 Trial: October 6, 2008

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25 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

26 Attached hereto is ANAVERDE, LLC'S Exhibit List submitted for trial.  
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| <b>Exhibit #</b> | <b>Offered By</b> |            | <b>Description</b>  | <b>Legal Grounds for Objections</b> | <b>Date Offr'd</b> | <b>Date Admit</b> |
|------------------|-------------------|------------|---|-------------------------------------|--------------------|-------------------|
| II-3000          | Co-Defendant      |            | Grant Deed  |                                     |                    |                   |
| II-3001          | Co-Defendant      |            | Map of Anaverde Creek Watershed within Antelope Valley Adjudication Area.   |                                     |                    |                   |
| II-3002          | Co-Defendant      |            | Map of Anaverde Ranch Location.   |                                     |                    |                   |
| II-3003          | Co-Defendant      |            | Lambie Exhibit 3  |                                     |                    |                   |
| II-3004          | Co-Defendant      |            | Map of Groundwater Well Locations in and near Anaverde Creek Basin.   |                                     |                    |                   |
| II-3005          | Co-Defendant      | 05/00/1997 | Map of Geology of Anaverde Creek Groundwater Basin.   |                                     |                    |                   |
| II-3006          | Co-Defendant      |            | Visual Example of Movement Sense of Geologic Faults.  |                                     |                    |                   |
| II-3007          | Co-Defendant      |            | Visual Example of Hydrogeologic Conceptual Model.   |                                     |                    |                   |
| II-3008          | Co-Defendant      |            | Visual Example of Depiction of Geologic Faults in Relation to Groundwater Movement, Strike-Slip, Down-Drop Block Faults.  |                                     |                    |                   |
| II-3009          | Co-Defendant      | 00/00/1967 | U.S Geologic Survey of Bloyd 1967 Geologic Section C-C' of Groundwater Table in Relation to Geologic Faults in Bedrock and Unconsolidated Deposits, showing water-table 1964. |                                     |                    |                   |
| II-3010          | Co-Defendant      |            | Visual Example of Hydrogeology of Flow Across Faults Streamtube Method of Analysis.   |                                     |                    |                   |
| II-3011          | Co-Defendant      | 00/00/2005 | Map of Groundwater Well Locations and Names on Anaverde Ranch.  |                                     |                    |                   |

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|------------------|-------------------|---|-------------------------------------|--------------------|-------------------|
| II-3012          | Co-Defendant      | 00/00/2008 Map of Summer 2008 Groundwater Countour Map on Site.   |                                     |                    |                   |
| II-3013          | Co-Defendant      | 00/00/2005 Map of Estimated Verdant Area in Anaverde Creek Groundwater Basin.                               |                                     |                    |                   |
| II-3014          | Co-Defendant      | Visual Example of Consumptive Use of Water by Plants and Evaporation.                                       |                                     |                    |                   |
| II-3015          | Co-Defendant      | 8/1/2008 Through 08/20/2008, Chart of Groundwater, Barometric Presure and Temperature Graph Anaverde Creek. |                                     |                    |                   |
| II-3016          | Co-Defendant      | 9/24/2008 Blanely Criddle Estimate of Evapotranspiration in Anaverde Creek Groundwater Basin.               |                                     |                    |                   |
| II-3017          | Co-Defendant      | Chart of Moench Predicted Well Response at Well 6.  |                                     |                    |                   |
| II-3018          | Co-Defendant      | Groundwater Chemistry of Anaverde Creek and Antelope Valley Basins.   |                                     |                    |                   |
| II-3019          | Co-Defendant      | 00/00/2008 Map of Summer 2008 Groundwater Elevation Contour Map from Site to NE of Palmdale.                |                                     |                    |                   |
| II-3020          | Co-Defendant      | 03/00/1988 Law Environmental Plate 2 of 1988 Groundwater Elevations.  |                                     |                    |                   |
| II-3021          | Co-Defendant      | Lambie Exhibit 21   |                                     |                    |                   |
| II-3022          | Co-Defendant      | 7/16/2008 Summit Envirosolutions Map of Project Area, Anaverde Development.                                 |                                     |                    |                   |
| II-3023          | Co-Defendant      | 7/16/2008 Summit Envirosolutions Topographical Map of Project Area, Anaverde Development.                   |                                     |                    |                   |

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|-----------|--------------|---|------------------------------|-------------|------------|
| II-3024   | Co-Defendant | 7/16/2008 Summit Envirosolutions Topographical Map of Annual Mean Precipitation, Anaverde Development.  |                              |             |            |
| II-3025   | Co-Defendant | Photo of Anaverde West View from Aquaduct.  |                              |             |            |
| II-3026   | Co-Defendant | Expert Lambie Pictures; 16 Total Pictures.  |                              |             |            |
| II-3027   | Co-Defendant | Photo of PW1 and PW2 Area.  |                              |             |            |
| II-3028   | Co-Defendant | Photo of Ranch Area Trees - Cows Hidden.  |                              |             |            |
| II-3029   | Co-Defendant | Photo of SW View from Aquaduct Road at Anaverde.  |                              |             |            |
| II-3030   | Co-Defendant | Photo of URSO1.   |                              |             |            |
| II-3031   | Co-Defendant | Photo of Well 3.  |                              |             |            |
| II-3032   | Co-Defendant | Photo of Well 4 Surrounds.  |                              |             |            |
| II-3033   | Co-Defendant | Photo of Well 4.  |                              |             |            |
| II-3034   | Co-Defendant | Photo of Well 8.  |                              |             |            |
| II-3035   | Co-Defendant | Through 00/00/1966, Map of Groundwater Elevation Countour from Site to NE of Palmdale.  |                              |             |            |
| II-3036   | Co-Defendant | 11/27/2001 "Exhibit 15": Best Best & Krieger LLP Work Product Privileged Letter re: Diamond Farming Company v. City of Lancaster, et al., Case No. RIC 344436 Consolidated with RIC 344668. |                              |             |            |

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|-----------|--------------|---|------------------------------|-------------|------------|
| II-3037   | Co-Defendant | 10/10/2008 "Exhibit 17": Emailed Correspondence to Joe Scalmanini from Tom Bunn re: AV Groundwater, Anaverde Creek Basin area definition and Anaverde Property definition.  |                              |             |            |
| II-3038   | Co-Defendant | "Exhibit 18": Luhdorff & Scalmanini Consult Engineers Map of Anaverde Property and Anaverde Creek Basin Extent, Antelope Valley Area of Adjudication Outlining AVAA Jurisdictional Boundary and Anaverde Creek Basin.       |                              |             |            |
| II-3039   | Co-Defendant | "Exhibit 19": Luhdorff & Scalmanini Map of Anaverde Property and Anaverde Creek Basin Extent, Antelope Valley Are of Adjudication Outlining AVAA Jurisdictional Boundary, Palmdale Water District and Anaverde Creek Basin. |                              |             |            |
| II-3040   | Co-Defendant | "Exhibit 20": Resume of Joseph C. Scalmanini.   |                              |             |            |
| II-3041   | Co-Defendant | "Exhibit 21": Well Depth Log with Annual Projection Graphs  |                              |             |            |
| II-3042   | Co-Defendant | 9/17/2008 "Exhibit 22": Luhdorff & Scalmanini Geological Cross Section for Elevation Readings, Antelope Valley Area of Adjudication.  |                              |             |            |

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|-----------|--------------|--|------------------------------|-------------|------------|
| II-3043   | Co-Defendant | 9/10/2008 "Exhibit 23": Best Best & Krieger LLP Attorney-Client Work Product Maps of Location of 3,000 AF/YR Pumpage added to the Model Well at Model Row 18 and Column 19 and Groundwater Level Change in Layer 1, 2 and 3 in 1995 after addition of 3,000 AF/YR Pumpage. |                              |             |            |
| II-3044   | Co-Defendant | 00/00/1930 Through 00/00/1996, "Exhibit 24": USGS Simulation of Ground-Water Flow and Land Subsidence, Antelope Valley Ground-Water Basin, CA; Water-Resources Investigation Report 03-4016.   |                              |             |            |
| II-3045   | Co-Defendant | 01/00/2005 "Exhibit 25": City of Rohnert Park Final Water Supply Assessment.   |                              |             |            |
| II-3046   | Co-Defendant | Map of Cantanion Anion CaNa.   |                              |             |            |
| II-3047   | Co-Defendant | Map of Cantanion Anion SO4.  |                              |             |            |
| II-3048   | Co-Defendant | 8/14/2008 Expert Witness Designation.  |                              |             |            |
| II-3049   | Co-Defendant | 4/2/2003 First American Title Company Report   |                              |             |            |
| II-3050   | Co-Defendant | Figure 3.2 from PSR  |                              |             |            |
| II-3051   | Co-Defendant | Figure 3.6 from PSR  |                              |             |            |
| II-3052   | Co-Defendant | Expert Report of John Lambie   |                              |             |            |
| II-3053   | Co-Defendant | ALTA - ACSM Land Titile Survey Anaverde Ranch  |                              |             |            |
| II-3054   | Co-Defendant | 03/00/1956 Ground Water Contours   |                              |             |            |
| II-3055   | Co-Defendant | 03/00/1988 Ground Water Contours   |                              |             |            |

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|-----------|--------------|---|------------------------------|-------------|------------|
| II-3056   | Co-Defendant | 1956-1988 Change in Ground Water Levels |                              |             |            |
| II-3057   | Co-Defendant | Well Location Map                       |                              |             |            |
| II-3058   | Co-Defendant | Blue Prints                             |                              |             |            |
| II-3059   | Co-Defendant | Map of Antelope Valley Plate 1          |                              |             |            |
| II-3060   | Co-Defendant | Reserved                                |                              |             |            |
| II-3061   | Co-Defendant | Reserved                                |                              |             |            |
| II-3062   | Co-Defendant | Reserved                                |                              |             |            |
| II-3063   | Co-Defendant | Reserved                                |                              |             |            |
| II-3064   | Co-Defendant | Demonstrative                           |                              |             |            |
| II-3065   | Co-Defendant | Demonstrative                           |                              |             |            |
| II-3066   | Co-Defendant | Demonstrative                           |                              |             |            |
| II-3067   | Co-Defendant | Demonstrative                           |                              |             |            |

ANAVERDE, LLC reserves the right to supplement this exhibit list with documents as necessary.

DATED: October \_\_\_\_, 2008

Respectfully submitted,

MALISSA HATHAWAY McKEITH  
 KIMBERLY A. HUANGFU  
 LEWIS BRISBOIS BISGAARD & SMITH LLP

By: /s/  
 KIMBERLY A. HUANGFU  
 Attorneys for ANAVERDE, LLC.

**PROOF OF SERVICE**

1 I declare that:

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

5 On October 3, 2008, 2008, I served **ANAVERDE LLC'S AMENDED EXHIBIT LIST**  
6 posting the document(s) to the Santa Clara Superior Court website in regard to the Antelope  
7 Valley Groundwater matter.

8 I declare under penalty of perjury under the laws of the State of California that the above is  
9 true and correct, executed on October 3, 2008, 2008.

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12 \_\_\_\_\_/s/  
13 Maritza Estrada  
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