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8 Attorneys for ANAVERDE LLC

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **COUNTY OF SANTA CLARA**

11 **ANTELOPE VALLEY GROUNDWATER**  
12 **CASES:**

13 Included Actions:  
14 Los Angeles County Waterworks District No.  
40 v. Diamond Farming Co.  
Superior Court of California  
15 County of Los Angeles, Case No. BC325201  
16 Los Angeles County Waterworks District No.  
40 v. Diamond Farming Co.  
17 Superior Court of California  
County of Kern, Case No. S-1500-CV-254-  
18 348  
19 Wm. Bolthouse Farms, Inc. v. City of  
Lancaster  
20 Diamond Farming Co. v. City of Lancaster  
Diamond Farming Co. v. Palmdale Water Dist.  
21 Superior Court of California  
County of Riverside, consolidated actions  
22 Case Nos. RIC 353840, RIC 344436,  
RIC 344668  
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Judicial Council Coordination  
Proceeding No. 4408

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

**ANAVERDE LLC'S PHASE 2 SECOND  
AMENDED EXHIBIT LIST**

Phase 2 Trial: October 6, 2008  
Location: LASC, Dept. 1  
Time: 9:00 a.m.

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

Attached hereto is ANAVERDE LLC'S Second Amended Exhibit List submitted for trial.

Exhibit #	Offered By	Description	Legal Grounds for Objections	Date Offer'd	Date Admit
II-3000	Co-Defendant	Grant Deed, Doc. No. 2007-0331457, County of San Bernardino, June 1, 2007, 3:12 p.m.			
II-3001	Co-Defendant	Photograph of Anaverde Creek Looking West.			
II-3002	Co-Defendant	Photograph of Anaverde Wetlands Looking West to Well 4 Fenced Area at Edge of Property.			
II-3003	Co-Defendant	Photograph of Wetlands West to Powerline on Ritter Ranch			
II-3004	Co-Defendant	Photograph of Two Large Culvert Pipes Looking South Across Wetlands			
II-3005	Co-Defendant	Photograph of Anaverde Wetlands Looking Toward SW Main Drainage at Sewer Access Road			
II-3006	Co-Defendant	Photograph of Anaverde Wetlands Looking West to Main Drainage at Sewer Access Road.			
II-3007	Co-Defendant	Photograph of Anaverde Wetlands Looking West to NW at Sewer Access Road.			
II-3008	Co-Defendant	Photograph of Anaverde Wetlands Looking Toward Old City Ranch Trees and Well URS-01 With Generator.			

4842-0284-5955.11. (Relevancy, Personal Knowledge,	No Objection; Admissibility Stipulated
2. Irrelevant (§ 210)	Authenticity) (§ 1400, Identity)
3. Hearsay (§ 1200)	7. Unduly Time Consuming, Prejudicial, Confusing,
4. Best Evidence (§ 1500)	or Misleading (§ 352)
5. Inadmissible Opinion (§ 800)	8. Subsequent Repair (§ 1151)
6. Insufficient Foundation (§ 403)	9. Other (Specify)

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Exhibit #	Offered By	Description	Legal Grounds for Objections	Date Offr'd	Date Admit
II-3009	Co-Defendant	Photograph of Anaverde Sewer Access Road Looking Northerly From Bend at Aqueduct – City Ranch Area by Trees.			
II-3010	Co-Defendant	Photograph of Anaverde Access Road on S. Side of Aqueduct Looking S., SE. to Edge of Phase 1.			
II-3011	Co-Defendant	Photograph of Anaverde Creek Undercrossing for Access Road Looking W. SW.			
II-3012	Co-Defendant	Photograph of Anaverde Access Road Looking South to Graded Foothill Areas.			
II-3013	Co-Defendant	Photograph of Anaverde Creek Undercrossing for Designed Road from Aqueduct and Sewer Alignment Looking S. to SW. to Graded Areas.			
II-3014	Co-Defendant	Photograph of Anaverde Looking S. to SW. Across Wetlands to Two Unidentified Wells at Edge of Wetland Site Grading in Background.			
II-3015	Co-Defendant	Photograph of Anaverde Wetlands Looking From Temporary Access Road to Design Road Out Toward Well 4 From Aqueduct.			
II-3016	Co-Defendant	Photograph of Anaverde Property w/ Gentleman in Foreground.			

- 4842-0284-5955.11. No Objection; Admissibility Stipulated  
 (Relevancy, Personal Knowledge, Authenticity) (§ 1400, Identity)
- |                                    |   |
|------------------------------------|---|
| 2. Irrelevant (§ 210)              | 7. Unduly Time Consuming, Prejudicial, Confusing, |
| 3. Hearsay (§ 1200)                | or Misleading (§ 352)                             |
| 4. Best Evidence (§ 1500)          | 8. Subsequent Repair (§ 1151)                     |
| 5. Inadmissible Opinion (§ 800)    | 9. Other (Specify)                                |
| 6. Insufficient Foundation (§ 403) |   |

Exhibit #	Offered By	Description	Legal Grounds for Objections	Date Offer'd	Date Admit
II-3017	Co-Defendant	Technical Memorandum, Ground-Water Basin and Subbasin Boundaries, Antelope Valley Ground-Water Basin, Luhdorff and Scalmanini, January 2002 with Attachment, Plate 1.			
II-3018	Co-Defendant	Anaverde LLC's First Set of Requests for Production of Documents Propounded on Each Public Water Supplier Listed on Exhibit 1.			
II-3019	Co-Defendant	Anaverde LLC's First Set of Request for Admissions Propounded on Each Public Water Supplier Listed on Exhibit 1.			
II-3020	Co-Defendant	Anaverde LLC's First Set of Special Interrogatories Propounded on Each Public Water Supplier Listed on Exhibit 1.			
II-3021	Co-Defendant	Curriculum Vitae of Dr. John Lambie.			
II-3022	Co-Defendant	7/16/2008 Project Area Map, Anaverde Development, Palmdale, CA Figure 1 Summit Envirosolutions.			
II-3023	Co-Defendant	7/16/2008 Project Area Map, Anaverde Development, Palmdale, CA Figure 1 Summit Envirosolutions.			
II-3024	Co-Defendant	7/16/2008 Annual Mean Precipitation, Anaverde Development, Palmdale, CA Figure 2 Summit Envirosolutions.			
II-3025	Co-Defendant	Anaverde LLC's First Set of Contention			

- 4842-0284-5955.11. No Objection; Admissibility Stipulated
- (Relevancy, Personal Knowledge, Authenticity) (§ 1400, Identity)
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| 2. Irrelevant (§ 210)              | 7. Unduly Time Consuming, Prejudicial, Confusing, |
| 3. Hearsay (§ 1200)                | or Misleading (§ 352)                             |
| 4. Best Evidence (§ 1500)          | 8. Subsequent Repair (§ 1151)                     |
| 5. Inadmissible Opinion (§ 800)    | 9. Other (Specify)                                |
| 6. Insufficient Foundation (§ 403) |   |

Exhibit #	Offered By	Description	Legal Grounds for Objections	Date Offer'd	Date Admit
		Interrogatories Propounded on Each Public Water Supplier Listed on Exhibit 1.			
II-3026	Co-Defendant	Anaverde LLC's Form Interrogatories—General, Set No. One.			
II-3027	Co-Defendant	Photograph of Eastern Westlands by Aqueduct Looking West to Wells PW1, PW2 From Well 8.			
II-3028	Co-Defendant	Photograph of Ranch Area Trees.			
II-3029	Co-Defendant	Photograph of SW View from Aqueduct Road at Anaverde.			
II-3030	Co-Defendant	Photograph of Well URS-01 with Generator Looking NW.			
II-3031	Co-Defendant	Photograph of Well 3.			
II-3032	Co-Defendant	Photograph of Well 4 Surroundings.			
II-3033	Co-Defendant	Photograph of Well 4.			
II-3034	Co-Defendant	Photograph of Well 8.			
II-3035	Co-Defendant	1965-66, Groundwater Elevation Contour Map from Site to NE of Palmdale.			
II-3036	Co-Defendant	Anaverde LLC, Form Interrogatories – General, Set No. Two.			

- 4842-0284-5955.11. No Objection; Admissibility Stipulated  
 (Relevancy, Personal Knowledge, Authenticity) (§ 1400, Identity)
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| 2. Irrelevant (§ 210)              | 7. Unduly Time Consuming, Prejudicial, Confusing, |
| 3. Hearsay (§ 1200)                | or Misleading (§ 352)                             |
| 4. Best Evidence (§ 1500)          | 8. Subsequent Repair (§ 1151)                     |
| 5. Inadmissible Opinion (§ 800)    | 9. Other (Specify)                                |
| 6. Insufficient Foundation (§ 403) |   |

Exhibit #	Offered By	Description	Legal Grounds for Objections	Date Offer'd	Date Admit
II-3037	Co-Defendant	Anaverde LLC, Second Set of Special Interrogatories Propounded on Each Public Water Supplier Listed on Exhibit 1.			
II-3038	Co-Defendant	Anaverde LLC, Second Set of Request For Admissions Propounded on Each Public Water Supplier Listed on Exhibit 1.			
II-3039	Co-Defendant	Anaverde LLC Second Set of Requests for Production of Documents Propounded on Each Public Water Supplier Listed on Exhibit 1.			
II-3040	Co-Defendant	Photo of Anaverde West View from Aqueduct.			
II-3041	Co-Defendant	Aerial Photo.			
II-3042	Co-Defendant	Anaverde Proposed New Development Plan, "Exhibit A"			
II-3043	Co-Defendant	Anaverde New Phasing Plan, "Exhibit B"			
II-3044	Co-Defendant	Anaverde - Phase 1 City of Palmdale, CA By Sikand.			
II-3045	Co-Defendant	Reserved.			
II-3046	Co-Defendant	Map of Catanion Anion, Ca/Na.			
II-3047	Co-Defendant	Map of Catanion Anion SO4.			
II-3048	Co-Defendant	Reserved.			

- 4842-0284-5955.11. No Objection; Admissibility Stipulated  
 (Relevancy, Personal Knowledge, Authenticity) (§ 1400, Identity)
- |                                    |   |
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| 3. Hearsay (§ 1200)                | or Misleading (§ 352)                             |
| 4. Best Evidence (§ 1500)          | 8. Subsequent Repair (§ 1151)                     |
| 5. Inadmissible Opinion (§ 800)    | 9. Other (Specify)                                |
| 6. Insufficient Foundation (§ 403) |   |

Exhibit #	Offered By	Description	Legal Grounds for Objections	Date Offer'd	Date Admit
II-3049	Co-Defendant	4/2/2003 First American Title Company Report.			
II-3050	Co-Defendant	Problem Statement Report, Antelope Valley Area of Adjudication, prepared by Antelope Valley Technical Committee, June 26, 2008, Figure 3.2.			
II-3051	Co-Defendant	Problem Statement Report, Antelope Valley Area of Adjudication, prepared by Antelope Valley Technical Committee, June 26, 2008, Figure 3.6.			
II-3052	Co-Defendant	Anaverde Creek Groundwater Basin Hydrologic Review, Dr. John Lambie, Sept. 2008.			
II-3053	Co-Defendant	ALTA/ACSM Land Title Survey for Anaverde Ranch and Chandar Project Palmdale, California.			
II-3054	Co-Defendant	03/00/1956 Palmdale Water District Ground Water Elevation, Ground Water Contours, March 1956.			
II-3055	Co-Defendant	03/00/1988 Ground Water Contours.			
II-3056	Co-Defendant	1956-1988 Change in Ground Water Levels.			
II-3057	Co-Defendant	Well Location Map.			
II-3058	Co-Defendant	Demonstrative.			
II-3059	Co-Defendant	Demonstrative.			
II-3060	Co-Defendant	Demonstrative.			

- 4842-0284-5955.11. No Objection; Admissibility Stipulated
- (Relevancy, Personal Knowledge, Authenticity) (§ 1400, Identity)
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|------------------------------------|---|
| 2. Irrelevant (§ 210)              | 7. Unduly Time Consuming, Prejudicial, Confusing, |
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Exhibit #	Offered By	Description	Legal Grounds for Objections	Date Offer'd	Date Admit
II-3061	Co-Defendant	Demonstrative.			
II-3062	Co-Defendant	Demonstrative.			
II-3063	Co-Defendant	Reserved.			
II-3064	Co-Defendant	Reserved.			
II-3065	Co-Defendant	Reserved.			
II-3066	Co-Defendant	Photograph: 1949 C - 13438, 1-126.			
II-3067	Co-Defendant	Photograph: 1949 C - 13438, 1-127			
II-3068	Co-Defendant	Photograph: 1957 C - 22867, 264			
II-3069	Co-Defendant	Photograph: 1940 C - 6500, 321-29			
II-3070	Co-Defendant	Photograph: 1940 C - 6500, 321-30			

- 4842-0284-5955.11. No Objection; Admissibility Stipulated  
 (Relevancy, Personal Knowledge,  
 2. Irrelevant (§ 210) Authenticity) (§ 1400, Identity)  
 3. Hearsay (§ 1200) 7. Unduly Time Consuming, Prejudicial,  
 Confusing,  
 4. Best Evidence (§ 1500) or Misleading (§ 352)  
 5. Inadmissible Opinion (§ 800) 8. Subsequent Repair (§ 1151)  
 6. Insufficient Foundation (§ 403) 9. Other (Specify)



1 ANAVERDE LLC reserves the right to supplement this Second Amended Exhibit List

2 with documents as necessary.

3  
4 DATED: October 6, 2008

Respectfully submitted,

5 MALISSA HATHAWAY McKEITH  
6 JOSEPH SALAZAR, JR.  
7 JACQUELINE MITTELSTADT  
8 KIMBERLY A. HUANGFU  
9 LEWIS BRISBOIS BISGAARD & SMITH LLP

10 By: /s/ Kimberly Huangfu  
11 KIMBERLY A. HUANGFU  
12 Attorneys for ANAVERDE, LLC.

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**PROOF OF SERVICE**

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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 October 6, 2008, 2008, I served **ANAVERDE LLC'S PHASE 2 SECOND AMENDED EXHIBIT LIST** posting the document(s) 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 October 6, 2008, 2008.

MS  
Maritza Estrada

**LEWIS BRISBOIS BISGAARD & SMITH LLP**  
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TELEPHONE 213.250.1800