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4 **21 East Carrillo Street**
5 **Santa Barbara, California 93101**
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8 **Attorneys for:** Gene T. Bahlman, William R. Barnes & Eldora M. Barnes Family Trust of 1989,
9 Thomas M. and Julie Bookman, B.J. Calandri, John Calandri, John Calandri as Trustee of the John
10 and B.J. Calandri 2001 Trust, Calmat Land Company, Sal and Connie L. Cardile, Consolidated Rock
11 Products, Del Sur Ranch LLC, Forrest G. Godde, Forrest G. Godde as Trustee of the Forrest G.
12 Godde Trust, Lawrence A. Godde, Lawrence A. Godde and Godde Trust, Dennis L. & Marjorie E.
13 Groven Trust, Healy Enterprises, Inc., Hines Family Trust, Habod Javadi, Juniper Hills Water
14 Group, Eugene V., Beverly A., & Paul S. Kindig, Paul S. & Sharon R. Kindig, Kootenai Properties,
15 Inc., Gailen Kyle, Gailen Kyle as Trustee of the Kyle Trust, James W. Kyle, James W. Kyle as
16 Trustee of the Kyle Family Trust, Julia Kyle, Wanda E. Kyle, Malloy Family Partners, Maritorea
17 Living Trust, Jose Richard H. Miner, Barry S. Munz, Terry A. Munz and Kathleen M. Munz,
18 Eugene B. Nebeker, R and M Ranch, Inc., John and Adrienne Reca, Edgar C. Ritter, Paula E. Ritter,
19 Paula E. Ritter as Trustee of the Ritter Family Trust, Sahara Nursery, Marygrace H. Santoro as
20 Trustee for the Marygrace H. Santoro Rev Trust, Marygrace H. Santoro, Mabel Selak, Jeffrey L. &
21 Nancee J. Siebert, Leo L. Simi, Helen Stathatos, Savas Stathatos, Savas Stathatos as Trustee for the
22 Stathatos Family Trust, Tierra Bonita Ranch Company, Beverly Tobias, White Fence Farms Mutual
23 Water Co. No. 3, **collectively known as the Antelope Valley Ground Water Agreement**
24 **Association (“AGWA”)**

25 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
26 **FOR THE COUNTY OF LOS ANGELES**

27 **ANTELOPE VALLEY**
28 **GROUNDWATER CASES**

) Judicial Council Coordination Proceeding
) No. 4408
)

29 Included Actions:

) **Santa Clara Case No. 1-05-CV-049053**
) Assigned to The Honorable Jack Komar
)

30 Los Angeles County Waterworks District No.)
31 40 v. Diamond Farming Co. Superior Court of)
32 California County of Los Angeles, Case No. BC)
33 325 201 Los Angeles County Waterworks)
34 District No. 40 v. Diamond Farming Co.)
35 Superior Court of California, County of Kern,)
36 Case No. S-1500-CV-254-348Wm. Bolthouse)
37 Farms, Inc. v. City of Lancaster Diamond)
38 Farming Co. v. City of Lancaster Diamond)
39 Farming Co. v. Palmdale Water Dist. Superior)
40 Court of California, County of Riverside,)
41 consolidated actions, Case No. RIC 353 840,)
42 RIC 344 436, RIC 344 668)

) **AMENDED NOTICE OF DEPOSITION OF**
) **EXPERT WITNESS ROBERT BEEBY AND**
) **REQUEST FOR PRODUCTION OF**
) **DOCUMENTS**

) **Date: October 25, 2010**
) **Time: 10:00 am**
) **Location: 301 North Lake Avenue,**
) **10th Floor Pasadena,**
) **California 91101-4108**

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TO ALL PARTIES AND ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on October 25, beginning at 10:00 am, at the offices of Lagerlof, Senecal, Gosney & Kruse, LLP, 301 North Lake Avenue, 10th Floor, Pasadena, California 91101-4108, the Antelope Valley Groundwater Agreement Association (“AGWA”) will take the deposition of Robert Beeby.

The deponent must bring to the deposition the expert’s entire file, including time and billing records, and the documents described in the attached Request for Production, which is incorporated herein by reference.

The deposition will be recorded by stenographic method before a certified reporter. The deposition will continue day to day until completed, excluding weekends and holidays.

PLEASE TAKE FURTHER NOTICE that the deponent is required to produce at the deposition the documents described in the attached Request.

REQUEST FOR PRODUCTION OF DOCUMENTS

PLEASE TAKE FURTHER NOTICE that the deponents set forth herein are requested to produce at the time of the deposition the following:

1. Deponent’s entire file concerning the above-captioned lawsuit.
2. Any and all writings prepared by or on behalf of deponent or anyone working at the direction of said deponent which in any way pertains to the review, analysis, opinions, conclusions, or beliefs of said deponent with regard to the subject matter of this litigation.
3. Any and all writings received and/or reviewed by said deponent pertaining to the subject matter of this litigation.
4. Any and all handwritten notes, field notes, calculations or other writings prepared by or on behalf of said deponent or by someone at the direction of said deponent pertaining to the subject matter of this litigation.

1 case, or concerning any of the matters referred to in any of the aforementioned categories of this list
2 of documents to be produced at deposition.

3 14. A list of all cases by name, venue, and date in which you have testified at deposition
4 and at trial.

5 15. All deposition, trial, arbitration and/or hearing transcripts in YOUR possession,
6 custody or control, wherein, YOU have previously testified as an expert witness in any legal
7 proceeding or deposition.

8 16. All expert witness reports generated by the deponents pursuant to Federal Rule of
9 Civil Procedure 26(2)(2)(B) over the last 10 years.

10 Dated: September 29, 2010

BROWNSTEIN HYATT FARBER SCHRECK, LLP



11
12 By: _____

13 MICHAEL T. FIFE
14 BRADLEY J. HERREMA
15 ATTORNEYS FOR AGWA

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PROOF OF SERVICE

**STATE OF CALIFORNIA,
COUNTY OF SANTA BARBARA**

I am employed in the County of Santa Barbara, State of California. I am over the age of 18 and not a party to the within action; my business address is: 21 E. Carrillo Street, Santa Barbara, California 93101.

On September 29, 2010, I served the foregoing document described as:

**AMENDED NOTICE OF DEPOSITION OF EXPERT WITNESS ROBERT BEEBY AND
REQUEST FOR PRODUCTION OF DOCUMENTS**

on the interested parties in this action.

By posting it on the website at 4:30 p.m. on September 29, 2010.
This posting was reported as complete and without error.

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

Executed in Santa Barbara, California, on September 29, 2010.



MARIA KLACHKO-BLAIR
TYPE OR PRINT NAME

SIGNATURE