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5 Attorneys for: Gene T. Bahlman, William R. Barnes & Eldora M. Barnes Family Trust of 1989, Thomas M. and Julie Bookman, B.J. Calandri, John Calandri, John Calandri as Trustee of the John 6 and B.J. Calandri 2001 Trust, Calmat Land Company, Sal and Connie L. Cardile, Consolidated Rock Products, Del Sur Ranch LLC, Forrest G. Godde, Forrest G. Godde as Trustee of the Forrest G. 7 Godde Trust, Lawrence A. Godde, Lawrence A. Godde and Godde Trust, Dennis L. & Marjorie E. Groven Trust, Healy Enterprises, Inc., Hines Family Trust, Habod Javadi, Juniper Hills Water 8 Group, Eugene V., Beverly A., & Paul S. Kindig, Paul S. & Sharon R. Kindig, Kootenai Properties, 9 Inc., Gailen Kyle, Gailen Kyle as Trustee of the Kyle Trust, James W. Kyle, James W. Kyle as Trustee of the Kyle Family Trust, Julia Kyle, Wanda E. Kyle, Malloy Family Partners, Maritorena 10 Living Trust, Jose Richard H. Miner, Barry S. Munz, Terry A. Munz and Kathleen M. Munz, Eugene B. Nebeker, R and M Ranch, Inc., John and Adrienne Reca, Edgar C. Ritter, Paula E. Ritter, 11 Paula E. Ritter as Trustee of the Ritter Family Trust, Sahara Nursery, Marygrace H. Santoro as Trustee for the Marygrace H. Santoro Rev Trust, Marygrace H. Santoro, Mabel Selak, Jeffrey L. & 12 Nancee J. Siebert, Leo L. Simi, Helen Stathatos, Savas Stathatos, Savas Stathatos as Trustee for the 13 Stathatos Family Trust, Tierra Bonita Ranch Company, Beverly Tobias, White Fence Farms Mutual Water Co. No. 3, collectively known as the Antelope Valley Ground Water Agreement 14 Association ("AGWA")

#### SUPERIOR COURT OF THE STATE OF CALIFORNIA

### FOR THE COUNTY OF LOS ANGELES

# 17 ANTELOPE VALLEY 18 GROUNDWATER CASES

19 Included Actions:

20	Los Angeles County Waterworks District No. 40 v. Diamond Farming Co. Superior Court of
21	California County of Los Angeles, Case No. BC
22	325 201 Los Angeles County Waterworks
	District No. 40 v. Diamond Farming Co.
23	Superior Court of California, County of Kern,
	Case No. S-1500-CV-254-348Wm. Bolthouse
24	Farms, Inc. v. City of Lancaster Diamond
	Farming Co. v. City of Lancaster Diamond
25	Farming Co. v. Palmdale Water Dist. Superior
26	Court of California, County of Riverside,
	consolidated actions, Case No. RIC 353 840,
27	RIC 344 436, RIC 344 668

Judicial Council Coordination Proceeding No. 4408

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

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

Date:
Time:
Location:

October 25, 2010 10:00 am 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.

9 The deposition will be recorded by stenographic method before a certified reporter. The
10 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:

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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.

AMENDED NOTICE OF TAKING OF DEPOSITION  $\ensuremath{2}$ 

BROWNSTEIN HYATT FARBER SCHRECK, LLP 21 East Carrillo Street Santa Barbara, CA 93101 S. Any and all photographs, videotapes, micrographs, or other such recording received,
 analyzed, prepared by, considered, relied upon by said deponent which pertains to the subject matter
 of this litigation.

6. Any and all books, articles, treatises, reports, or other writings which in any way form
the basis for any opinion, conclusion or analysis of said deponent relating to the subject matter of
this litigation.

7 7. Any and all writings pertaining to the billing and amount of time spent by said
8 deponent or others under the direction of said deponent in working on any matter pertaining to the
9 subject of this litigation. This includes but is not limited to any and all timesheets or billing
10 statements.

8. Any and all reports, conclusions, opinions, and drafts of the same prepared by
deponent in connection with the above-captioned lawsuit.

9. Any "engagement letter" or similar instructions received by deponent in connection
with the above-captioned matter.

10. Your current Curricula Vitae.

16 11. All documents, depositions, scientific, technical or professional texts, journals, or any
17 other "writings" (as defined by California Evidence Code, section 250) including any documents
18 prepared by any present or former party to this action which the deponent read, referred to,
19 considered or relied upon in preparing to testify in deposition or at trial, of this action.

All documents, depositions, scientific, technical or professional texts, journals, or any
 other action in which you provided testimony, either by deposition or in trial, as a percipient and/or
 expert witness, which you have read, referred to, considered or relied upon in preparing to testify or
 in testifying, in deposition or at trial, in this action.

All documents, correspondence, depositions, deposition summaries, memoranda, or
any other "writing" (as defined by California Evidence Code, section 250), prepared by you or sent
and/or received from counsel who retained you concerning the subject matter of the issues in this

AMENDED NOTICE OF TAKING OF DEPOSITION 3

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case, or concerning any of the matters referred to in any of the aforementioned categories of this list 1 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, custody or control, wherein, YOU have previously testified as an expert witness in any legal 6 7 proceeding or deposition.

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

> AMENDED NOTICE OF TAKING OF DEPOSITION 4

Dated: September 29, 2010

BROWNSTEIN HYATT FARBER SCHRECK, LLP

malad in

By:

MICHAEL T. FIFE **BRADLEY J. HERREMA** ATTORNEYS FOR AGWA

**BROWNSTEIN HYATT FARBER SCHRECK, LLP** 21 East Carrillo Street Santa Barbara, CA 93101

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1	PROOF OF SERVICE
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3	STATE OF CALIFORNIA, COUNTY OF SANTA BARBARA
4	I am employed in the County of Santa Barbara, State of California. I am over the age of 18
5	and not a party to the within action; my business address is: 21 E. Carrillo Street, Santa Barbara, California 93101.
6 7	On September 29, 2010, I served the foregoing document described as:
8	AMENDED NOTICE OF DEPOSITION OF EXPERT WITNESS ROBERT BEEBY AND REQUEST FOR PRODUCTION OF DOCUMENTS
9	on the interested parties in this action.
10	By posting it on the website at 4:30 p.m. on September 29, 2010. This posting was reported as complete and without error.
11 12	(STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.
13	Encente d'in Sente Derham, California en Sentember 20, 2010
14	Executed in Santa Barbara, California, on September 29, 2010.
15 16 17	the
18	MARIA KLACHKO-BLAIR SIGNATURE
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28	AMENDED NOTICE OF TAKING OF DEPOSITION
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