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4 **21 East Carrillo Street**  
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8 **Attorneys for:** Gene T. Bahlman, William and Julie Barnes, William R. Barnes & Eldora M. Barnes  
9 Family Trust of 1989, Thomas M. Bookman, B.J. Calandri, John Calandri, John Calandri as Trustee  
10 of the John and B.J. Calandri 2001 Trust, Son Rise Farms, Calmat Land Company, Sal and Connie  
11 L. Cardile, Efren and Luz Chavez, Consolidated Rock Products, Del Sur Ranch LLC, Steven Godde  
12 as Trustee of the Forrest G. Godde Trust, Lawrence A. Godde, Lawrence A. Godde and Godde  
13 Trust, Robert and Phillip Gorrindo, Gorrindo Family Trust, Laura Griffin, Healy Farms, Healy  
14 Enterprises, Inc., Habod Javadi, Juniper Hills Water Group, Eugene V., Beverly A., & Paul S.  
15 Kindig, Paul S. & Sharon R. Kindig, Kootenai Properties, Inc., Gailen Kyle, Gailen Kyle as Trustee  
16 of the Kyle Trust, James W. Kyle, James W. Kyle as Trustee of the Kyle Family Trust, Julia Kyle,  
17 Wanda E. Kyle, Maritorena Living Trust, Jose and Marie Maritorena, Richard H. Miner, Barry S.  
18 Munz, Terry A. Munz and Kathleen M. Munz, Eugene B. Nebeker, R and M Ranch, Inc., Richard  
19 and Michael Nelson, Robert Jones, John and Adrienne Reca, Edgar C. Ritter, Paula E. Ritter, Paula  
20 E. Ritter as Trustee of the Ritter Family Trust, Sahara Nursery, Mabel Selak, Jeffrey L. & Nancee J.  
21 Siebert, Dr. Samuel Kremen, Tierra Bonita Ranch Company, Beverly Tobias, Triple M Property  
22 FKA and 3M Property Investment Co., Vulcan Materials Co. and Vulcan Lands Inc., Willow  
23 Springs Company, Donna and Nina Wilson, Ramin Zomorodi, Genz Development and Castle Ranch  
24 Estate, **collectively known as the Antelope Valley Groundwater Agreement Association**  
25 **(“AGWA”)**

26 **[See next pages for additional counsel]**  
27 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

28 **FOR THE COUNTY OF LOS ANGELES**

18 **ANTELOPE VALLEY** )  
19 **GROUNDWATER CASES** ) Judicial Council Coordination Proceeding  
20 ) No. 4408

21 Included Actions: )  
22 ) **Santa Clara Case No. 1-05-CV-049053**  
23 ) Assigned to The Honorable Jack Komar

24 Los Angeles County Waterworks District No. )  
25 40 v. Diamond Farming Co. Superior Court of )  
26 California County of Los Angeles, Case No. BC ) **NOTICE OF DEPOSITION AND REQUEST**  
27 325 201 Los Angeles County Waterworks ) **FOR PRODUCTION OF DOCUMENTS OF**  
28 District No. 40 v. Diamond Farming Co. ) **COUNTY SANITATION DISTRICTS OF**  
Superior Court of California, County of Kern, ) **LOS ANGELES COUNTY NOS. 14 AND 20**  
Case No. S-1500-CV-254-348 Wm. Bolthouse ) **WITNESS RAY TREMBLAY, P.E.**  
Farms, Inc. v. City of Lancaster Diamond )  
Farming Co. v. City of Lancaster Diamond )  
Farming Co. v. Palmdale Water Dist. Superior )  
Court of California, County of Riverside, )  
consolidated actions, Case No. RIC 353 840, )  
RIC 344 436, RIC 344 668 )

1 The Antelope Valley Groundwater Agreement Association (“NOTICING PARTY”)  
2 hereby gives notice as follows:

3 **I. NOTICE OF DEPOSITION**

4 The NOTICING PARTY will take the deposition of the following expert witness (the  
5 “DEPONENT”) of the COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY  
6 NOS. 14 AND 20 at VERITEXT, 707 WILSHIRE BOULEVARD, SUITE 3500 LOS  
7 ANGELES, CA 90017, at the following date and time and will continue from day-to-day  
8 thereafter, weekends and holidays excepted:

<u>Deponent</u>	<u>Date</u>	<u>Time</u>
Ray Tremblay, P.E.	April 18, 2013	10:00 a.m.

11 **II. SUBJECT OF DEPOSITION**

12 The topics of the deposition shall include the following paragraphs of the Declaration of  
13 Ray Tremblay in Lieu of Deposition Testimony for Phase IV, filed January 31, 2013 (“Tremblay  
14 Decl.”):

- Paragraphs 2 and 3: Property ownership and parcel size. AGWA seeks to determine the full extent of farming of the parcels listed.
- Exhibits B through J and Attachment 2 to Tremblay Decl: It appears from the Stipulation and its reference to Mr. Tremblay’s Declaration that where there is any farming at all on a LA County Sanitation –owned parcel, LA County Sanitation may claim the full acreage for the parcel and multiplies this full acreage by crop water duties, thus improperly assuming higher water usage on the property than may have actually occurred due to farming. (E.g., Exhibits B through J and Attachment 2 to Tremblay Decl.) Where Attachment 2 to the Tremblay Decl. lists crops farmed, these are not correlated with the assessor’s parcel numbers provided in Exhibits A1 and A2, and the total acreage for each crop is not apportioned by parcel numbers. AGWA cannot confirm whether or not LA County Sanitation claims the entire acreage under production or only a portion of their acreage under

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production.

- Paragraphs 33 and 34: Crop water duties for irrigation referred to in this paragraph, as well as the crop acreage farmed.
- Paragraphs 36 through 41: Method of calculation of water use and crop type on each parcel farmed.
- Paragraphs 41 and 42 of Tremblay Decl.: Claimed “in-lieu” of pumping groundwater rights, and evidence that the surface water taken actually replaces groundwater pumped.
- Return flow accounting and utilization of imported water to the Basin.
- Calculation of applied water use.

### **III. REQUEST FOR PRODUCTION**

#### **A. DEFINITIONS**

The following words and phrases shall govern the construction of this document unless the context otherwise requires:

1. “DEPONENT” or “YOU” or “YOUR” means the deponent as set forth in the notice.
2. “DOCUMENT” means “writing” as defined by Evidence Code section 250 and includes drafts, originals and duplicates of written, graphic, computer or otherwise recorded matters, whether stored in written, electronic, magnetic or photographic format or by any other means.
3. “SANITATION DISTRICTS” means COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY NOS. 14 AND 20.

#### **B. DOCUMENTS AND THINGS TO BE PRODUCED**

The DEPONENT is required to produce, at the date, time and location so noticed, all DOCUMENTS described below. This demand relates not only to all DOCUMENTS under the DEPONENT’s possession, custody or control, but also those DOCUMENTS reasonably available

- 1 to the DEPONENT.
- 2 1. All DOCUMENTS received, reviewed or relied upon by the DEPONENT in  
3 preparing to provide expert testimony in this proceeding.
- 4 2. All DOCUMENTS supporting SANITATION DISTRICTS' claimed beneficial  
5 use of groundwater since year 2000.
- 6 3. All DOCUMENTS evidencing SANITATION DISTRICTS' future demand for  
7 groundwater.
- 8 4. All Notice of Groundwater Extraction reports filed by SANITATION  
9 DISTRICTS with the State Water Resources Control Board since year 2000.
- 10 5. All preliminary, draft and final DOCUMENTS prepared by or on behalf of the  
11 DEPONENT which in any way pertain to the DEPONENT's review, analysis, opinions,  
12 conclusions, or beliefs regarding the subject matter of the Phase 4 trial.
- 13 6. All DOCUMENTS that summarize the DEPONENT's education, training and  
14 experience, including all versions of DEPONENT's resume or curriculum vitae.
- 15 7. All DOCUMENTS that the DEPONENT intends to use at the time of trial as  
16 illustrative or demonstrative evidence.
- 17 8. All photographs, video tapes, or other recordings which pertain to the  
18 DEPONENT's opinion in the Phase 4 trial.
- 19 9. All books, articles, treatises, reports, journals or other DOCUMENTS, which the  
20 DEPONENT reviewed, considered or relied upon as the basis for any opinion, conclusion, or  
21 analysis of the DEPONENT.
- 22 10. All DOCUMENTS that set forth the terms and conditions of the DEPONENT's  
23 employment in this matter.
- 24 11. All of the DEPONENT's time records and billing statements for work performed  
25 relating to the subject matter of this litigation.
- 26 12. The DEPONENT's entire file concerning this proceeding.
- 27 13. All electronic files and software reviewed, considered or relied upon by the  
28 DEPONENT in reaching any opinion.

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14. All DOCUMENTS evidencing any communication with any attorney for the County Sanitation District of Los Angeles County Nos. 14 and 20 regarding the subject matter of this proceeding.

15. All DOCUMENTS evidencing any communication with any evidence for the County Sanitation District of Los Angeles County Nos. 14 and 20 regarding the subject matter of this proceeding.

16. All DOCUMENTS evidencing or relating to the production of water by the County Sanitation District of Los Angeles County Nos. 14 and 20 within the Antelope Valley Area of Adjudication from 2000-2012.

Dated: April 9, 2013

BROWNSTEIN HYATT FARBER SCHRECK, LLP

By:   
MICHAEL T. FIFE  
BRADLEY J. HERREMA  
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 April 9, 2013, I served the foregoing document described as:

**NOTICE OF DEPOSITION AND REQUEST FOR PRODUCTION OF DOCUMENTS OF  
COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY NOS. 14 AND 20  
WITNESS RAY TREMBLAY, P.E.**

on the interested parties in this action.

By posting it on the website by 5:00 p.m. on April 9, 2013.

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 April 9, 2013.

**LINDA MINKY  
TYPE OR PRINT NAME**

  
\_\_\_\_\_  
**SIGNATURE**