

**EXHIBIT A TO
DECLARATION OF
MICHAEL T. FIFE**

1 JEFFREY V. DUNN, Bar No. 131926
jeffrey.dunn@bbklaw.com
2 ERIC L. GARNER, Bar No. 130665
eric.garner@bbklaw.com
3 BEST BEST & KRIEGER LLP
18101 Von Karman Avenue, Suite 1000
4 Irvine, California 92612
Telephone: (949) 263-2600
5 Facsimile: (949) 260-0972
Attorneys for Cross-Complainant
6 Los Angeles County Waterworks District No. 40

**EXEMPT FROM FILING FEES
UNDER GOVERNMENT CODE
SECTION 6103**

7 OFFICE OF COUNTY COUNSEL
COUNTY OF LOS ANGELES
8 John F. Krattli, Bar No. 82149
County Counsel
9 Warren Wellen, Bar No. 139152
Principal Deputy County Counsel
10 500 West Temple Street
Los Angeles, California 90012
11 Telephone: (213) 974-8407
Telecopier: (213) 687-7337
12 Attorneys for Los Angeles County Waterworks
District No. 40

13 SUPERIOR COURT OF THE STATE OF CALIFORNIA

14 COUNTY OF LOS ANGELES – CENTRAL DISTRICT

15 ANTELOPE VALLEY GROUNDWATER
16 CASES

Judicial Council Coordination Proceeding
No. 4408

17 Included Actions:

CLASS ACTION

18 Los Angeles County Waterworks District
No. 40 v. Diamond Farming Co., Superior
Court of California, County of Los
Angeles, Case No. BC 325201;

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

19 Los Angeles County Waterworks District
20 No. 40 v. Diamond Farming Co., Superior
Court of California, County of Kern, Case
21 No. S-1500-CV-254-348;

PUBLIC WATER SUPPLIERS' NOTICE OF
DESIGNATION OF EXPERT WITNESSES;
DECLARATION OF JEFFREY V. DUNN

22 Wm. Bolthouse Farms, Inc. v. City of
Lancaster, Diamond Farming Co. v. City of
23 Lancaster, Diamond Farming Co. v.
Palmdale Water Dist., Superior Court of
24 California, County of Riverside, Case Nos.
RIC 353 840, RIC 344 436, RIC 344 668;

25 RICHARD WOOD, on behalf of himself
26 and all other similarly situated v. A.V.
Materials, Inc., et al., Superior Court of
27 California, County of Los Angeles, Case
No. BC509546.

1 TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

2
3 PLEASE TAKE NOTICE that pursuant to the provisions of California Code of Civil
4 Procedure § 2034.010, et. seq., Los Angeles County Waterworks District No. 40, Littlerock Creek
5 Irrigation District, Palm Ranch Irrigation District, Desert Lake Community Services District,
6 North Edwards Water District, Llano Del Rio Water Company, Llano Mutual Water Company,
7 Big Rock Mutual Water Company, Rosamond Community Services District, the City of
8 Lancaster, Palmdale Water District, Quartz Hill Water District, the City of Palmdale, and
9 California Water Service Company (“Public Water Suppliers”), by and through their attorneys of
10 record, hereby exchange, the following: (1) a list containing the name and address of each person
11 whose expert opinion testimony that the parties expect to offer at trial, whether orally or by
12 deposition testimony; and (2) an expert witness declaration for each such person pursuant to Code
13 of Civil Procedure Sections 2034.210, subdivision (b), and 2034.260, subdivision (c).
14 Additionally, Public Water Suppliers reserve the right to use previously submitted expert
15 testimony from trial phases I, II, III, and IV.

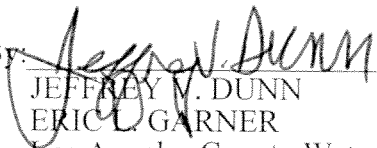
16 Public Water Suppliers designate the following expert witnesses based upon the
17 allegations and contentions known to them at this time. Should new allegations and contentions
18 be made, Public Water Suppliers reserve the right to designate and call at the time of trial such
19 other expert witnesses as may be appropriate. The expert witnesses Public Water Suppliers
20 intend to call are as follows:

- 21 1. Dennis Williams
22 GeoScience Support Services, Inc.
23 620 W. Arrow Highway, Suite 2000
24 La Verne, California 91750
25 Telephone: (909) 451-6650
- 26 2. Robert Beeby
27 Beeby Engineering, Inc.
28 200 Longhorn Lane
Ojai, California 93023-4203
Telephone: (805) 646-8652

1 Public Water Suppliers reserve the right to call rebuttal expert witnesses once the expert
2 witnesses of other parties have been designated, deposed, or have testified at the time of trial.

3
4 Dated: November 18, 2013

BEST BEST & KRIEGER LLP

5
6 By:  _____
7 JEFFREY V. DUNN
8 ERIC L. GARNER
9 Los Angeles County Waterworks District
10 No. 40

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
LAW OFFICES OF
BEST BEST & KRIEGER LLP
18101 VON KARMAN AVENUE, SUITE 1000
IRVINE, CALIFORNIA 92612

DECLARATION OF JEFFREY V. DUNN

I, Jeffrey V. Dunn, declare:

1. I have personal knowledge of the facts below, and if called upon to do so, I could testify competently thereto in a court of law.

2. I am an attorney licensed to practice law in the State of California. I am a partner of Best, Best & Krieger LLP, attorneys of record for the Los Angeles County Waterworks District No. 40 (“District No. 40”).

3. District No. 40, Littlerock Creek Irrigation District, Palm Ranch Irrigation District, Desert Lake Community Services District, North Edwards Water District, Llano Del Rio Water Company, Llano Mutual Water Company, Big Rock Mutual Water Company, Rosamond Community Services District, the City of Lancaster, Palmdale Water District, Quartz Hill Water District, the City of Palmdale, and California Water Service Company (“Public Water Suppliers”) intend to offer at trial, either orally or by deposition testimony the following experts: Dr. Williams and Mr. Beeby.

4. All experts named have agreed to testify as expert witnesses at the Phase 5 trial.

5. Attached to this declaration as Exhibit “1” are the resumes of Dr. Williams and Mr. Beeby.

6. Dr. Williams is the founder and president of GEOSCIENCE Support Services, Inc., and has over 40 years of experience in groundwater hydrology. During that time he has directed geohydrologic investigations domestically and worldwide which includes the design and construction supervision of over 800 deep large-scale municipal and irrigation water supply wells. Dr. Williams has taught graduate level courses in geohydrology and groundwater modeling since 1980 and is currently directing research on groundwater and wells at University of Southern California’s geohydrologic laboratory. Dr. Williams is the author of over thirty publications on groundwater and wells and is the principal author of the Handbook of Ground Water Development (John Wiley & Sons, 1990). Dr. Williams is a California Professional Geologist (No. 461), certified California Hydrogeologist (No. 139) and a certified Ground Water Hydrologist (American Institute of Hydrology, No. 355).

1 7. Dr. Williams may be called to offer testimony concerning return flows, and the
2 characteristics, structure, hydrologic conditions of the groundwater underlying the Basin. Dr.
3 Williams will be available to provide rebuttal testimony.

4 8. Mr. Beeby is currently the principal of Beeby Engineering, Inc., and has
5 approximately 50 years of engineering experience in project planning and management of water
6 resources for a wide range of clients, including agricultural and urban water purveyors, power
7 providers, federal, state and local governmental agencies. He has served as principal-in-charge
8 and directed technical studies related to the adjudication of groundwater pumping rights of
9 several groundwater basins; served on Technical Expert Committees appointed to develop the
10 factual aspects of groundwater basins under court adjudication; directed studies leading to water
11 management programs/exchanges between agricultural and urban interest; developed regional
12 plans for management of surface and groundwater resources; directed studies relating to technical
13 and economic feasibility of agricultural water projects; and has managed the preliminary design
14 and construction phases of major water resource facilities.

15 9. Since 1980, Mr. Beeby has provided expert witness testimony in numerous
16 proceedings relating to land, water use, groundwater adjudications and water rights. He has
17 testified before a Special Master appointed by the Supreme Court, the California State Water
18 Resources Control Board, and court groundwater adjudications, such as the Santa Maria Valley
19 Groundwater Cases. Mr. Beeby is a registered civil engineer in California, Arizona, and
20 Washington. Mr. Beeby is also a State of California registered agricultural engineer.

21 10. Mr. Beeby may be called to offer testimony regarding return flows in the Antelope
22 Valley. Mr. Beeby may be called to offer testimony to rebut testimony of other experts.


23 11. Dr. Williams and Mr. Beeby are sufficiently familiar with the pending action to
24 submit a meaningful oral deposition concerning their respective testimony, including their expert
25 opinions and the basis of their opinions.

26 12. Dr. Williams' hourly fee for depositions and trial testimony is \$500.00 plus travel
27 time. Mr. Beeby's hourly fee for deposition and trial testimony is \$340.00 plus travel time.

28 I declare under penalty of perjury under the laws of the State of California that the

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

foregoing is true and correct. Executed this 18th day of November, 2013 at Irvine, California.



Jeffrey V. Dunn

26345.00000\8405363.1

LAW OFFICES OF
BEST BEST & KRIEGER LLP
18101 VON KARMAN AVENUE, SUITE 1000
IRVINE, CALIFORNIA 92612

PROOF OF SERVICE

I, Kerry V. Keefe, declare:

I am a resident of the State of California and over the age of eighteen years, and not a party to the within action; my business address is Best Best & Krieger LLP, 5 Park Plaza, Suite 1500, Irvine, California, 92614. On November 18, 2013, I served the within document(s):

PUBLIC WATER SUPPLIERS' NOTICE OF DESIGNATION OF EXPERT WITNESSES;
DECLARATION OF JEFFREY V. DUNN

- by posting the document(s) listed above to the Santa Clara County Superior Court website in regard to the Antelope Valley Groundwater matter.
- by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Irvine, California addressed as set forth below.
- by causing personal delivery by ASAP Corporate Services of the document(s) listed above to the person(s) at the address(es) set forth below.
- by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.
- I caused such envelope to be delivered via overnight delivery addressed as indicated on the attached service list. Such envelope was deposited for delivery by Federal Express following the firm's ordinary business practices.

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

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

Executed on November 18, 2013, at Irvine, California.


Kerry V. Keefe