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6 Attorneys for DIAMOND FARMING COMPANY,
7 a California corporation, and CRYSTAL ORGANIC
8 FARMS, a limited liability company

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **IN AND FOR THE COUNTY OF LOS ANGELES**

11
12 Coordination Proceeding Special Title
(Rule 1550 (b))

Judicial Council Coordination No. 4408

13 ANTELOPE VALLEY GROUNDWATER
14 CASES

Case No.: 1-05-CV-049053

15 Included actions:

**DESIGNATION OF EXPERT
WITNESSES BY PLAINTIFF/CROSS-
DEFENDANTS DIAMOND FARMING,
INC. AND CRYSTAL ORGANIC
FARMS, LLC**

16 Los Angeles County Waterworks District No.
17 40 vs. Diamond Farming Company
18 Los Angeles Superior Court
19 Case No. BC 325201

[C.C.P. §2034.210 et seq.]

20 Los Angeles County Waterworks District No.
21 40 vs. Diamond Farming Company
22 Kern County Superior Court
23 Case No. S-1500-CV 254348 NFT

24 Diamond Farming Company vs. City of
25 Lancaster
26 Riverside County Superior Court
27 Lead Case No. RIC 344436 [Consolidated
28 w/Case Nos. 344668 & 353840]

DATE: October 6, 2008
TIME: 9:00 a.m
DEPT: 1

AND RELATED CROSS-ACTIONS.

COME NOW the above-named plaintiffs/Cross-defendants, DIAMOND FARMING, INC. and
CRYSTAL ORGANIC FARMS, LLC by and through their attorneys of record, Bob H. Joyce, who

1 designates the foregoing individuals who may be called to testify as to the phase two issue at time of the
2 phase two trial as expert witnesses:

3 **NON-RETAINED EXPERTS**

4 1. Joseph C. Scalmanini, P.E.
5 Luhdorff and Scalmanini, Consulting Engineers
6 500 First Street
7 Woodland, California 95695-4026
8 Telephone Number (530) 661-0109

9 2. It is anticipated that Mr. Scalmanini will testify in accordance with the findings and
10 conclusions set forth in his technical memorandum dated January 2002 and identified as "Ground Water
11 Basin and Subbasin Boundaries Antelope Valley Groundwater Basin." Attached hereto as Exhibit A
12 is a copy of the technical memorandum.

13 3. Plaintiff and Cross-Defendants hereby designate each expert of each party participating
14 in this expert designation. Further, plaintiff and cross-defendants reserve their right to supplement this
15 designation pursuant to Code of Civil Procedure section 2034.280 as well as the presentation of
16 additional witnesses as may be required at the time of trial pursuant to Code of Civil Procedure section
17 2034.310.

18 **RETAINED EXPERTS**

19 4. Plaintiff/Cross-Complainants do not presently designate a retained expert but reserve their
20 right to supplement this designation pursuant to Code of Civil Procedure section 2034.280.

21 Dated: August 15, 2008

LeBEAU • THELEN, LLP

22 By: 

23 BOB H. JOYCE
24 Attorneys for DIAMOND FARMING COMPANY,
25 a California corporation, and CRYSTAL ORGANIC
26 FARMS, a limited liability company

PROOF OF SERVICE

1 ANTELOPE VALLEY GROUNDWATER CASES
2 JUDICIAL COUNCIL PROCEEDING NO. 4408
3 CASE NO.: 1-05-CV-049053

4 I am a citizen of the United States and a resident of the county aforesaid; I am over the age
5 of eighteen years and not a party to the within action; my business address is: 5001 E. Commercenter
6 Drive, Suite 300, Bakersfield, California 93309. On August 15, 2008, I served the within

7 **DESIGNATION OF EXPERT WITNESSES BY PLAINTIFF/CROSS-DEFENDANTS**

8 **DIAMOND FARMING, INC. AND CRYSTAL ORGANIC FARMS, LLC**

9 [C.C.P. §2034.210 et seq.]

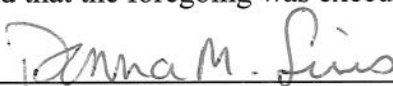
10 (BY POSTING) I am "readily familiar" with the Court's Clarification Order.
11 Electronic service and electronic posting completed through www.scefilings.org ; All papers filed
12 in Los Angeles County Superior Court and copy sent to trial judge and Chair of Judicial Council.

13 Los Angeles County Superior Court
14 111 North Hill Street
15 Los Angeles, CA 90012
16 Attn: **Department 1**
17 (213) 893-1014

Chair, Judicial Council of California
Administrative Office of the Courts
Attn: Appellate & Trial Court Judicial Services
(Civil Case Coordinator)
Carlotta Tillman
455 Golden Gate Avenue
San Francisco, CA 94102-3688
Fax (415) 865-4315

18 (BY MAIL) I am "readily familiar" with the firm's practice of collection and
19 processing correspondence for mailing. Under that practice it would be deposited with the U.S.
20 Postal Service on that same day with postage thereon fully prepaid at Bakersfield, California, in
21 the ordinary course of business.

22 (STATE) I declare under penalty of perjury under the laws of the State of
23 California that the above is true and correct, and that the foregoing was executed on August 15,
24 2008, in Bakersfield, California.

25 
26 _____
27 **DONNA M. LUIS**
28