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Exempt from Filing Fee Pursuant to  
Government Code Section 6103

11 Attorneys for Defendant CITY OF LOS ANGELES

12  
13 SUPERIOR COURT OF THE STATE OF CALIFORNIA

14 COUNTY OF LOS ANGELES

15 Coordination Proceeding

Case No. 105 CV 049053

16 **ANTELOPE VALLEY**  
17 **GROUNDWATER CASES**

Judicial Council Coordination Proceeding  
No. 4408

18 Los Angeles County Waterworks District  
No. 40 v. Diamond Farming Co.

Hon. Jack Komar

**DESIGNATION OF EXPERT WITNESS**

19 Los Angeles County Waterworks District  
20 No. 40 v. Diamond Farming Co.

Riverside County Superior Court  
Lead Case No. RIC 344436  
Case No. RIC 344668  
Case No. RIC 353840

21 Wm. Bolthouse Farms, Inc. v. City of  
Lancaster

Los Angeles Superior Court  
Case No. BC 325201

22 Diamond Farming Co. v. City of  
23 Lancaster

24 Diamond Farming Co. v. Palmdale Water  
25 District

Kern County Superior Court  
Case No. S-1500-CV-254348

26  
27 COMES NOW Defendant CITY OF LOS ANGELES ("Defendant" herein), by and  
28 though its attorney of record, Janet K. Goldsmith, Esq. of Kronick, Moskowitz, Tiedemann &

1 Girard, a Professional Corporation, who declares under penalty of perjury that the following  
2 individual may be called to testify at the time of trial as an expert witness.

3 Timothy J. Durbin, Timothy J. Durbin, Inc, Consulting Hydrologists, 5330 Primrose  
4 Drive, Suite 228, Fair Oaks, California, 95628. Mr. Durbin will testify concerning the boundaries  
5 of the Antelope Valley groundwater basin and its sources of recharge. Mr. Durbin's report  
6 containing his opinion on this subject is filed concurrently herewith, and includes his resume.  
7 Counsel is informed and believes that Mr. Durbin charges \$190 per hour for any deposition or  
8 trial testimony, including travel time and expenses.

9 Defendant hereby designates as its own expert witness to any and all experts designated  
10 by other parties hereto and reserves the right to claim such experts as its own and call them as its  
11 own witnesses at trial if desired.

12 Defendant reserves the rights expressly set forth in California Code of Civil Procedure  
13 section 2034.210, et seq. concerning the retention, designation and use of expert witnesses.


14 Defendant reserves all rights to subsequently name expert witnesses as provided by  
15 California Code of Civil Procedure section 2034, et seq.

16 I declare under the penalty of perjury that the foregoing is true and correct and that this  
17 Declaration was executed on June 29, 2006, at Sacramento, California.

18 Dated: June 29, 2006 \_\_\_\_\_

19 ROCKARD J. DELGADILLO, City Attorney  
20 Richard M. Brown, Senior Assistant City Attorney for  
Water and Power

21 KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD  
22 A Professional Corporation

23 By   
24 Janet K. Goldsmith  
25 Attorneys for Defendant CITY OF LOS ANGELES  
26  
27  
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