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EXEMPT FROM FILING FEES UNDER  
GOVERNMENT CODE SECTION 6103

7 Attorneys for Federal Defendants

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**COUNTY OF LOS ANGELES**

9 Coordination Proceeding )  
10 Special Title (Rule 1550(b)) ) Judicial Council Coordination  
Proceeding No. 4408

11 ANTELOPE VALLEY GROUNDWATER CASES )

12 Included actions: )

**SUPPLEMENTAL EXPERT  
WITNESS DECLARATION**

13 Los Angeles County Waterworks District No. 40 v.  
Diamond Farming Co., et al. )

14 Los Angeles County Superior Court, Case No. BC 325  
201 )

15 Los Angeles County Waterworks District No. 40 v.  
Diamond Farming Co., et al. )

16 Kern County Superior Court, Case No. S-1500-CV-  
17 254-348 )

18 Wm. Bolthouse Farms, Inc. v. City of Lancaster )

Diamond Farming Co. v. City of Lancaster )

19 Diamond Farming Co. v. Palmdale Water District )

Riverside County Superior Court, Consolidated Action,  
20 Case nos. RIC 353 840, RIC 344 436, RIC 344 668 )

21 AND RELATED CROSS ACTIONS )  
22 \_\_\_\_\_ )

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24 Pursuant to California *Code of Civil Procedure* § 2034.280, Cross-Defendant, United  
25 States of America, hereby supplements its list of experts with Dr. Jason Sun who may be called  
26 to testify at the time of the Phase 2 Trial or related hearings. The United States reserves the right  
27 to supplement this witness list and designate additional witnesses including expert witnesses for  
28 use in rebuttal. The United States further reserves the right to call as an witness at trial an expert  
not previously designated for impeachment purposes pursuant to *Code of Civil Procedure* §

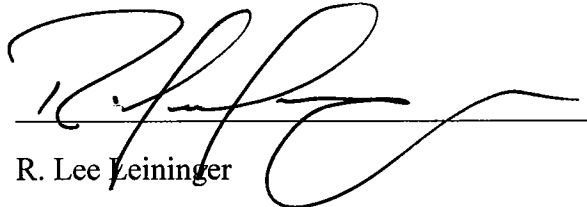
1 2034.310.

2 The United States further declares that:

- 3 1. Dr. Sun has a Doctor of Philosophy degree in Civil and Environmental Engineering, with an  
4 emphasis in ground water hydrology, from the Massachusetts Institute of Technology. Dr. Sun  
5 has conducted ground water model simulations and has reviewed ground water model calibration  
6 for over 10 years. Dr. Sun has reviewed/modified/performed ground water models in southern  
7 California since 2005. Dr. Sun has been performing ground water modeling work for Edwards  
8 AFB in California since 2007. Dr. Sun also participated in ground water modeling projects in  
9 Oregon, Washington, Florida, New York, and Massachusetts. Dr. Sun is experienced in ground  
10 water model review, statistical analysis on field data, data reduction, and groundwater  
11 remediation analysis. A copy of his Curriculum Vitae is attached as Exhibit 1.
- 12 2. Dr. Sun may provide rebuttal testimony to refute opinions of other experts on the use of  
13 hydrogeological modeling to establish the existence of subbasins in the Antelope Valley.
- 14 3. Dr. Sun has agreed to testify at the Phase II trial.
- 15 4. Dr. Sun is sufficiently familiar with this pending action to submit to a meaningful oral  
16 deposition concerning the use of groundwater modeling.
- 17 5. Dr. Sun's rate is \$163.58 per hour for testifying at depositions, mediations, arbitrations, trial,  
18 and for travel time; plus all out-of-pocket expenses, including, but not limited to, hotel, airfare,  
19 car rental, copying, postage, shipping, telephone calls, etc.

20 I declare under the penalty of perjury, the above statements are true and correct.

21 Dated this 4th day of September 2008.

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24 R. Lee Leininger

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