

1 IGNACIA S. MORENO
Assistant Attorney General
2 Environment and Natural Resources Division
3 R. LEE LEININGER
United States Department of Justice
4 Environment and Natural Resources Division
1961 Stout St., Suite 800
5 Denver, Colorado 80294
lee.leininger@usdoj.gov
6 Phone: 303/844-1364 Fax: 303/844-1350
7 Attorneys for Federal Defendants

EXEMPT FROM FILING FEES UNDER
GOVERNMENT CODE SECTION 6103

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

10 Coordination Proceeding)
Special Title (Rule 1550(b))) Judicial Council Coordination
11 ANTELOPE VALLEY GROUNDWATER CASES) Proceeding No. 4408
12 Included actions:)
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.)
16 Diamond Farming Co., et al.)
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 _____)

**E X P E R T W I T N E S S
D E C L A R A T I O N**

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24
25 Pursuant to California *Code of Civil Procedure* § 2034.260, Cross-Defendant, United
26 States of America, hereby designates Dr. June Oberdorfer as an expert witness who may be
27 called to testify at the time of the Phase III Trial or related hearings. The United States reserves
28 the right to supplement this witness list and designate additional witnesses including expert
witnesses for use in rebuttal. The United States further reserves the right to call as a witness at

1 trial an expert not previously designated for impeachment purposes pursuant to *Code of Civil*
2 *Procedure* § 2034.310.

3 The United States further declares that:

4 1. Dr. Oberdorfer is a Professional Geologist and Certified Hydrogeologist in the State of
5 California. She has a Doctor of Philosophy degree in Geology and Geophysics, with an emphasis
6 in hydrogeology, from the University of Hawaii. She has conducted groundwater investigations
7 for over 29 years. Dr. Oberdorfer is a Professor in the Department of Geology at San Jose State
8 University and acts as a consultant on groundwater related issues. In the present case, her role is
9 a consultant to AECOM, Inc. She was designated as an expert witness in the Phase I and Phase
10 II trials in this case. She has conducted groundwater investigations in California since 1984,
11 including investigations in groundwater basin characterization, water supply, and groundwater
12 contamination. This work has included several investigations in the North Muroc area of the
13 Antelope Valley groundwater basin. A copy of her resume is attached to this declaration as
14 Exhibit A.

15 2. Dr. Oberdorfer has been asked to provide testimony for the upcoming Phase III trial on
16 addressing the status of the aquifer and the issue of overdraft. In general, the substance of her
17 expert opinion testimony and the bases therefore are set forth in Dr. Oberdorfer's July 2010
18 expert disclosure report, *Antelope Valley Groundwater Cases, Phase 3: Status of Aquifer and*
19 *Issue of Overdraft*, is attached to this declaration as Exhibit B.

20 3. Dr. Oberdorfer has agreed to testify at the Phase III trial.

21 4. Dr. Oberdorfer is sufficiently familiar with this pending action to submit to a meaningful
22 oral deposition concerning the specific testimony, including her opinion and its basis.

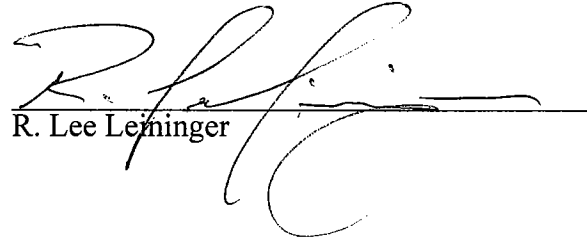
23 5. Dr. Oberdorfer's rate is \$ 214.50 per hour for testifying at depositions, mediations,
24 arbitrations, trial, and for travel time; plus all out-of-pocket expenses, including, but not limited
25 to, hotel, airfare, car rental, copying, postage, shipping, telephone calls, etc.

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

Dated this 15th day of July, 2010.


R. Lee Leminger

PROOF OF SERVICE

I, Karmen Robinson, declare:

I am a resident of the State of Colorado and over the age of 18 years, and not a party to the within action. My business address is U.S. Department of Justice, Environmental and Natural Resources Section, 1961 Stout Street, 8th Floor, Denver, Colorado 80294.

On July 15, 2010, I caused the foregoing documents described as; **EXPERT WITNESS DECLARATION**, to be served on the parties via the following service:

BY ELECTRONIC SERVICE AS FOLLOWS by posting the document(s) listed above to the Santa Clara website in regard to the Antelope Valley Groundwater matter.

BY MAIL AS FOLLOWS (to parties so indicated on attached service list): By placing true copies thereof enclosed in sealed envelopes addressed as indicated on the attached service list.

BY OVERNIGHT COURIER: I caused the above-referenced document(s) be delivered to FEDERAL EXPRESS for delivery to the above address(es).

Executed on July 15, 2010, at Denver, Colorado.

/s/ Karmen Robinson
Karmen Robinson
Paralegal Specialist