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8 Attorneys for Cross-Defendant
9 WAGAS LAND COMPANY LLC

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

11 **ANTELOPE VALLEY**
12 **GROUNDWATER CASES**

13 **Included Actions:**

14 Los Angeles County Waterworks District
15 No. 40 v. Diamond Farming Co., Superior
16 Court of California, County of Los Angeles
17 Case No. BC325201; Los Angeles County
18 Waterworks District No. 40 v. Diamond
19 Farming Co., Superior Court of California,
20 County of Kern Case No. S-1500-
21 CV254348; Wm. Bolthouse Farms, Inc. v.
22 City of Lancaster; Diamond Farming Co. v.
23 City of Lancaster; Diamond Farming Co. v.
24 Palmdale Water Dist., Superior Court of
25 California, County of Riverside,
26 Consolidated Actions, Case Nos.
27 RIC353840, RIC344436, RIC344668.

Judicial Council Coordination Proceeding
No. 4408

For filing purposes only:
Santa Clara Case No. 1-05-CV-049053

Assigned to the Hon. Jack Komar

DECLARATION OF EDWARD S.
RENWICK IN SUPPORT OF EX PARTE
APPLICATION FOR RELIEF FROM
EXPERT DISCLOSURE DEADLINE

Date: June 25, 2008
Time: 8:15 a.m.
Dept: 17

1 **DECLARATION OF EDWARD S. RENWICK**

2
3 I Edward S. Renwick, declare as follows:

4 1. I am an attorney licensed to practice law before the courts of the State of
5 California. I am a partner of the law firm of Hanna and Morton LLP, counsel of record for the
6 WAGAS Land Company LLC ("WAGAS") in the above-entitled matter. I have personal
7 knowledge of the following, and, if called as a witness, I would and could testify competently to
8 the following:

9 2. To date, WAGAS has not propounded any discovery, because of the Court's stay
10 on discovery.

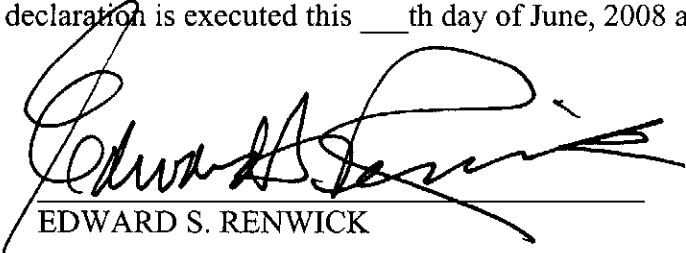
11 3. WAGAS has not retained an expert consultant for analysis of the matters at issue
12 in the Phase 2 trial, because it does not know what claims will be made by the purveyors, because
13 it does not have the resources to hire multiple consultants and because it does not want to risk
14 expending its resources until it knows exactly what areas of expertise will be required. I believe
15 WAGAS will know this on June 27, 2008.

16 4. WAGAS is now approaching other similarly situated landowners with the hope of
17 sharing costs of necessary consultants.

18 5. If WAGAS is given a 60-day extension to the court's June 27 expert witness
19 disclosure deadline, it believes it will be able to make arrangements to obtain the services of
20 appropriate consultants and be in a position to post its expert disclosure(s).

21 I declare under penalty of perjury under the laws of the State of California that the
22 foregoing is true and correct, and that this declaration is executed this ___th day of June, 2008 at
23 Los Angeles, California.

24 DATED: June 20, 2008

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26 EDWARD S. RENWICK
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PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California, I am over the age of 18 and not a party to the within action; my business address is: 444 South Flower Street, Suite 1500, Los Angeles, California 90071.

On June 24, 2008, I served the foregoing document described as:

DECLARATION OF EDWARD S. RENWICK IN SUPPORT OF EX PARTE APPLICATION FOR RELIEF FROM EXPERT DISCLOSURE DEADLINE

On the interested parties in this action.

By posting it on the website at 11 a.m. on June 24, 2008. This posting was reported as complete and without error.

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

Executed in Los Angeles, California, on June 24, 2008.



Sylvia Cantos