

1 Law Offices of
2 **MATHENY SEARS LINKERT & JAIME, LLP**
3 NICHOLAS R. SHEPARD, ESQ. (SBN 300629)
4 3638 American River Drive
5 Sacramento, California 95864
6 Telephone: (916) 978-3434
7 Facsimile: (916) 978-3430
8 nshepard@mathenysears.com

9 Attorneys for Defendants, JOHNNY ZAMRZLA,
10 PAMELLA ZAMRZLA, JOHNNY LEE
11 ZAMRZLA and JEANETTE ZAMRZLA
12 (collectively "ZAMRZLA'S")

13 SUPERIOR COURT OF THE STATE OF CALIFORNIA
14 COUNTY OF LOS ANGELES – CENTRAL DISTRICT

15 Coordinated Proceeding,
16 Special Title (Rule 1550(b))

17 ANTELOPE VALLEY
18 GROUNDWATER CASES.

Judicial Council Coordination
Proceeding No.: 4408

LASC Case No. BC325201

Santa Clara Sup. Court Case No.: 1-05-CV-049053
Assigned to Hon. Jack Komar, Judge of the Santa
Clara County Superior Court

**ZAMRZLA'S DISCLOSURE OF EXPERT
WITNESSES**

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21 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

22 COMES NOW defendants, JOHNNY ZAMRZLA, PAMELLA ZAMRZLA, JOHNNY
23 LEE ZAMRZLA and JEANETTE ZAMRZLA, in accordance with the requirements of Code of
24 Civil Procedure section 2034.010, et seq., and discloses the following expert witnesses as described
25 in Code of Civil Procedure section 2034.260 who may be called at the time of trial:

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NON-RETAINED EXPERTS

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2 1. Rick Koch, Southern California Edison, 10180 Telegraph Road, Ventura, CA, 93004, (805)
3 654-7312;

4 Defendant reserves the right to call any expert witness to provide rebuttal testimony to any
5 expert testimony presented at trial. Said reservation preserves defendant’s right to call any expert
6 witness to provide rebuttal testimony to any retained or non-retained expert called by the other
7 parties or any expert retained, or otherwise called or utilized at trial by any party to this lawsuit.

8 Defendant reserves the right to call any expert witness necessary to testify on issues and/or
9 opinions not as yet raised by discovery to date, continuing investigation, or any other party’s
10 experts.

11 Defendant also reserve the right to call at the time of trial each and every expert witness
12 disclosed by every party to this litigation.


13 Defendant further reserve the right to call the as non-retained expert witnesses at the time
14 of trial any medical practitioner who has consulted or conferred with any party at any time.

15 Defendant also reserves the right to call as an expert any person that has been deposed to
16 date or whose deposition is taken prior to trial.

17 Defendant further reserves their right, pursuant to the Code of Civil Procedure, to
18 supplement, augment, and/or modify their expert witness list at any time prior to trial.

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20 Dated: August 19, 2022

MATHENY SEARS LINKERT & JAIME, LLP

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22 By: 
23 _____
24 NICHOLAS R. SHEPARD, ESQ.,
25 Attorney for Defendants, JOHNNY
26 ZAMRZLA, PAMELLA ZAMRZLA,
27 JOHNNY LEE ZAMRZLA AND
28 JEANETTE ZAMRZLA (collectively
“ZAMRZLA’S”)

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PROOF OF SERVICE
[Code Civ. Proc. §§ 1011, 1013, 1013(a)(3) & 2015.5]

ANTELOPE VALLEY GROUNDWATER CASES
Case No. 1-05-CV-049053 (For filing purposes only)
JCCP 4408

(STATE OF CALIFORNIA, COUNTY OF SACRAMENTO)

I am a resident of the United States and employed in Sacramento County. I am over the age of eighteen years and not a party to the within entitled action. My business address is 3638 American River Drive, Sacramento, California.

On August 19, 2022, I served the following documents on the parties in this action described as follows:

ZAMRZLA'S DISCLOSURE OF EXPERT WITNESSES

- BY ELECTRONIC SERVICE:** by posting the document(s) listed above to the Antelope Valley Groundwater Cases to all parties listed on the Santa Clara Superior Court Service List as maintained via Glotrans. Electronic service completed through <http://www.avwatermaster.org>.
- BY OVERNIGHT MAIL:** by causing document(s) to be picked up by an overnight delivery service company for delivery to the address(es) on the next business day.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

Executed on this 19th day of August 2022, at Sacramento, California.


Kym Green