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10 Defendant Tejon Ranchcorp

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
12 **COUNTY OF LOS ANGELES - CENTRAL DISTRICT**

13 ANTELOPE VALLEY GROUNDWATER ) Judicial Council Coordination No. 4408  
14 CASES )

15 Included Actions: ) Santa Clara Case No. 1-05-CV-049053  
16 Los Angeles County Waterworks District No. 40 ) Assigned to Hon. Jack Komar

17 v. Diamond Farming Co., Superior Court of )  
18 California, County of Los Angeles, Case No. BC ) **SECOND AMENDED**  
19 325201; ) **NOTICE OF EXPERT DEPOSITION**  
20 ) **AND REQUEST FOR PRODUCTION**  
21 ) **OF DOCUMENTS**

22 Los Angeles County Waterworks District No. 40 )  
23 v. Diamond Farming Co., Superior Court of )  
24 California, County of Kern, Case No. S-1500-CV- )  
25 254-348; ) Date: October 27, 2008

26 Wm. Bolthouse Farms, Inc. v. City of Lancaster, )  
27 Diamond Farming Co. v. Lancaster, Diamond ) Time: 9:00 a.m.  
28 Farming Co. v. Palmdale Water Dist., Superior ) Place: Lagerlof Senecal,  
Court of California, County of Riverside, Case ) et al., LLP  
No. RIC 353 840, RIC 344 436, RIC 344 668 ) 301 North Lake Avenue  
10<sup>th</sup> Floor  
Pasadena, CA 91101

NOTICE IS HEREBY GIVEN as follows:

The defendant TEJON RANCHCORP (the "Noticing Party") will take the deposition of TOM SHEAHAN (the "Deponent") at LAGERLOF SENEAL, ET AL., LLP, 301 North Lake Avenue, 10<sup>th</sup> Floor, Pasadena, California 91101, at the following

1 date and time and will continue from day-to-day thereafter, weekends and holidays  
2 excepted:

<u>Witness</u>	<u>Date</u>	<u>Time</u>
Tom Sheahan	October 27, 2008	9:00 a.m.

5 The deponent is required to produce the documents, records and other  
6 materials described in the attached **Exhibit A**.

8 A list of all parties or attorneys on whom this notice is being served is  
9 shown on the accompanying Proof of Service.

10 Dated: October 24, 2008 KUHS & PARKER

11  
12   
13 By \_\_\_\_\_  
14 Robert G. Kuhs, Attorneys  
15 for the Defendant Tejon Ranchcorp

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**EXHIBIT A**

**I. DEFINITIONS**

The following words and phrases shall govern the construction of this document unless the context otherwise requires:

1. "NOTICING PARTY" or "Tejon" means TEJON RANCHCORP.
2. "DEPONENT" or "YOU" or "YOUR" means the deponent as set forth in the notice.
3. "DOCUMENT" means "writing" as defined by Evidence Code section 250 and includes drafts, originals and duplicates of written, graphic, computer or otherwise recorded matters, whether stored in written, electronic, magnetic or photographic format or by any other means.

**II. DOCUMENTS TO BE PRODUCED**

You are required to produce, at the date, time and location so noticed, all DOCUMENTS described below. This demand relates not only to all DOCUMENTS under your possession, custody or control, but also those DOCUMENTS reasonably available to you.

1. All DOCUMENTS received, reviewed or relied upon by the DEPONENT in preparing to provide expert testimony in this proceeding.
2. All preliminary, draft and final DOCUMENTS prepared by or on behalf of the DEPONENT which in any way pertain to the DEPONENT's review, analysis, opinions, conclusions, or beliefs regarding the subject matter of the litigation.
3. All DOCUMENTS that summarize the DEPONENT's education, training and experience, including all versions of DEPONENT's resume or curriculum vitae.
4. All DOCUMENTS that the DEPONENT intends to use at the time of trial as illustrative or demonstrative evidence.
5. All photographs, video tapes, or other recordings which pertain to the DEPONENT's opinion in the proceeding.
6. All books, articles, treatises, reports, or other DOCUMENTS, which in any way form the basis for any opinion, conclusion, or analysis of the DEPONENT relating to the subject of his opinion.

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7. All DOCUMENTS that set forth the terms and conditions of the DEPONENT's employment in this matter.

8. All of the DEPONENT's time records and billing statements for work performed relating to the subject matter of this litigation.

9. YOUR entire file concerning YOUR opinion in this proceeding.

C:\WPDATA\WCK\Tejon Ranch\Sheahan Depo Notice.wpd


**PROOF OF SERVICE**

I, Lidia E. Luna, declare:

I am employed in the County of Kern, State of California. I am over the age of 18 and am not a party to the within action; my business address is Kuhs & Parker, 1200 Truxtun Avenue, Suite 200, Bakersfield, California 93301.

On October 24, 2008, I caused the foregoing document(s) described as: **SECOND AMENDED NOTICE OF EXPERT DEPOSITION AND REQUEST FOR PRODUCTION OF DOCUMENTS** to be served on the parties in this action, as follows::

- (X) (BY ELECTRONIC SERVICE) by posting the document(s) listed above to the Santa Clara County Superior Court website: [www.scefiling.org](http://www.scefiling.org) regarding the Antelope Valley Groundwater matter.
- ( ) (BY U.S. MAIL) I am readily familiar with the firm's practice of collection and processing of documents for mailing. Under that practice, the above-referenced document(s) were placed in seal envelope(s) addressed to the parties as noted above, with postage thereon fully prepaid and deposited such envelope(s) with the United States Postal Service on the same date at Bakersfield, California, addressed to:
- ( ) (BY FEDERAL EXPRESS) I served a true and correct copy by Federal Express or other overnight delivery service, for delivery on the next business day. Each copy was enclosed in an envelope or package designated by the express service carrier; deposited in a facility regularly maintained by the express service carrier or delivered to a courier or driver authorized to receive documents on its behalf; with delivery fees paid or provided for; addressed as shown on the accompanying service list.
- ( ) (BY FACSIMILE TRANSMISSION) I am "readily familiar" with the firm's practice of facsimile transmission of documents. It is transmitted to the recipient on the same day in the ordinary course of business.
- (X) (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.
- ( ) (FEDERAL) I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

  
\_\_\_\_\_  
Lidia E. Luna