

1 James W. Lewis (SBN 207599)
TAYLOR & RING
2 10900 Wilshire Boulevard, Suite 920
Los Angeles, California 90024
3 Telephone: (310) 209-4100
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4

Attorneys for Cross-defendants,
5 LITTLE ROCK SAND AND GRAVEL, INC.,
a California Corporation;
6 THE GEORGE AND CHARLENE LANE FAMILY TRUST;
THE FRANK AND YVONNE LANE 1993 FAMILY
7 TRUST, DATED MARCH 5, 1993, AS RESTATED
JULY 20, 2000; MONTE VISTA BUILDING SITES, INC.,
8 a California Corporation; A.V. MATERIALS, INC.,
a California Corporation;
9 HOLLIDAY ROCK CO., INC.,
successor in interest to
10 LITTLE ROCK AGGREGATE CO., INC. dba
ANTELOPE VALLEY AGGREGATE, INC.;
11 LITTLE ROCK AGGREGATE CO., INC. dba
ANTELOPE VALLEY AGGREGATE, INC.
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13
14 SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES
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| 16 ANTELOPE VALLEY GROUNDWATER CASES) | Judicial Council Coordination No. |
|) | 4408 |
| 17 Included Actions:) | For filing purposes only: |
|) | Santa Clara County Case No. |
| 18 Los Angeles County Waterworks) | 1-05-CV-049053 |
| District No. 40 v. Diamond) | |
| 19 Farming Co. Superior Court of) | [Assigned to the Honorable Jack |
| California County of Los Angeles,) | Komar] |
| 20 Case No. BC 325 201) | NOTICE OF INTENTION TO OFFER |
|) | VIDEO RECORDING OF DEPOSITION |
| 21 Los Angeles County Waterworks 2) | AND DEPOSITION OF EXPERT WITNESS |
| District No. 40 v. Diamong) | BLAKE MCCULLOUGH-SANDEN IN |
| 22 Farming Co. Superior court of) | EVIDENCE DURING THE PHASE IV |
| California, County of Kern, Case) | TRIAL OF THIS MATTER |
| 23 No. S-1500-CV-254-348) | |
|) | |
| 24 Wm. Bolthouse Farms, Inc. V. City) | |

1 of Lancaster Diamong Farming Co.)
V. City of Lancaster Diamond) Date: April 12, 2013
2 Farming Co. V. Palmdale Water) Time: 9:00 a.m.
Dist. Superior Court of)
3 California, County of Riverside,)
consolidated actions, Case No.)
4 RIC 353 840, RIC 344 436, RIC 344)
668)

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6 TO THE COURT AND TO ALL PARTIES AND THEIR ATTORNEYS OF
7 RECORD IN THIS MATTER:

8 PLEASE TAKE NOTICE that pursuant to Code of Civil Procedure
9 section 2025.340(m) and 2025.620 these cross-defendants intend
10 to offer into evidence during the Phase IV Trial of this matter
11 the entire video recording of the deposition of expert witness
12 Blake McCullough-Sanden and the entire stenographic transcript
13 of the deposition of Blake McCullough-Sanden that was taken in
14 this matter on April 12, 2013 at 9:00 a.m.

15 A Notice of Taking Videotaped Trial Preservation Deposition
16 of Expert Witness Blake McCullough-Sanden was served on all
17 parties by posting it on the court's website on April 4, 2013.
18 A copy of said notice is attached hereto as Exhibit 1.

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1 There were no objections to the deposition notice attached
2 as Exhibit 1 by any party to this action.

3 Dated: May 8, 2013

TAYLOR & RING

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5 By: 

6 James W. Lewis
7 Attorneys for Cross-
8 Defendants HOLLIDAY ROCK
9 CO., INC., successor in
10 interest to LITTLE ROCK
11 AGGREGATE CO., INC. dba
12 ANTELOPE VALLEY
13 AGGREGATE, INC.; THE
14 FRANK AND YVONNE LANE
15 1993 FAMILY TRUST, DATED
16 MARCH 5, 1993, AS
17 RESTATED JULY 20, 2000,
18 successor in interest to
19 FRANK A. LANE, ROE 612;
20 THE GEORGE AND CHARLENE
21 LANE FAMILY TRUST,
22 Successor in interest to
23 George M. Lane, Roe 316;
24 MONTE VISTA BUILDING
SITES, INC., a
California Corporation;
A.V. MATERIALS, INC., a
California Corporation,
ROE 9; A.C. WARNACK,
as Trustee of the A.C.
WARNACK TRUST; LITTLE
ROCK SAND AND GRAVEL,
INC.

EXHIBIT 1

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7 TRUST, DATED MARCH 5, 1993, AS RESTATED
JULY 20, 2000; MONTE VISTA BUILDING SITES, INC.,
8 a California Corporation; A.V. MATERIALS, INC.,
a California Corporation;
9 HOLLIDAY ROCK CO., INC.,
successor in interest to
10 LITTLEROCK AGGREGATE CO., INC. dba
ANTELOPE VALLEY AGGREGATE, INC.;
11 LITTLEROCK AGGREGATE CO., INC. dba
ANTELOPE VALLEY AGGREGATE, INC.
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14 FOR THE COUNTY OF LOS ANGELES
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California, County of Kern, Case)
23 No. S-1500-CV-254-348)
24 Wm. Bolthouse Farms, Inc. V. City)

NOTICE OF TAKING VIDEOTAPED
TRIAL PRESERVATION DEPOSITION OF
EXPERT WITNESS BLAKE McCULLOUGH-
SANDEN

Date: April 12, 2013
Time: 9:00 a.m.

1 of Lancaster Diamong Farming Co.)
V. City of Lancaster Diamond)
2 Farming Co. V. Palmdale Water)
Dist. Superior Court of)
3 California, County of Riverside,)
consolidated actions, Case No.)
4 RIC 353 840, RIC 344 436, RIC 344)
668)

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6 PLEASE TAKE NOTICE that on April 12, 2013 at 9:00 a.m.
7 these cross-defendants will take the deposition of their own
8 expert witness, Blake McCullough-Sanden. The deposition will
9 take place at Veritext, 707 Wilshire Boulevard, Suite 3500, Los
10 Angeles, CA 90017.

11 The deposition will be taken before a deposition officer
12 authorized to administer oaths under the laws of the State of
13 California. If said deposition is not completed, the taking
14 thereof is to continue from day to day, excluding weekends and
15 holidays, until completed.

16 Please also take notice that, pursuant to California Code
17 of Civil Procedure sections 2025.220(a)(5) and (6) and 2025.340,
18 the deposition shall be recorded by videotape, and that pursuant
19 to Section 2025.620, the videotape record of the deposition
20 shall be used at trial in lieu of live testimony.

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