James W. Lewis (SBN 207599)	
Los Angeles, California 90024	
Telephone: (310) 209-4100	
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Attorneys for Cross-defendants,	
LITTLE ROCK SAND AND GRAVEL, INC.,	
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THE GEORGE AND CHARLENE LANE FAMILY	TRUST;
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	ERIALS, INC.,
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SUPERIOR COURT OF THE S	STATE OF CALIFORNIA
FOR THE COUNTY OF	F LOS ANGELES
ANTELOPE VALLEY GROUNDWATER CASES	Judicial Council Coordination No
	4408
Included Actions:	For filing purposes only:
	Santa Clara County Case No.
Los Angeles County Waterworks	1-05-CV-049053
District No. 40 v. Diamond	
Farming Co. Superior Court of	[Assigned to the Honorable Jack Komar]
California County of Los Angeles,	Komar j
Case No. BC 325 201	NOTICE OF INTENTION TO OFFER
	VIDEO RECORDING OF DEPOSITION
	AND DEPOSITION OF EXPERT WITNESS
 	BLAKE MCCULLOUGH-SANDEN IN
II −	EVIDENCE DURING THE PHASE IV
	TRIAL OF THIS MATTER
NO. S-1500-CV-254-348	
 Wm. Bolthouse Farms Inc V City	
	TAYLOR & RING 10900 Wilshire Boulevard, Suite 920 Los Angeles, California 90024 Telephone: (310) 209-4100 Facsimile: (310) 208-5052 Attorneys for Cross-defendants, LITTLE ROCK SAND AND GRAVEL, INC., a California Corporation; THE GEORGE AND CHARLENE LANE FAMILY THE FRANK AND YVONNE LANE 1993 FAMI TRUST, DATED MARCH 5, 1993, AS REST JULY 20, 2000; MONTE VISTA BUILDING a California Corporation; A.V. MATE a California Corporation; HOLLIDAY ROCK CO., INC., successor in interest to LITTLEROCK AGGREGATE CO., INC. dba ANTELOPE VALLEY AGGREGATE, INC.; LITTLEROCK AGGREGATE CO., INC. dba ANTELOPE VALLEY AGGREGATE, INC. SUPERIOR COURT OF THE S FOR THE COUNTY OF ANTELOPE VALLEY GROUNDWATER CASES Included Actions: Los Angeles County Waterworks District No. 40 v. Diamond Farming Co. Superior Court of California County of Los Angeles,

1 of Lancaster Diamong Farming Co. Date: April 12, 2013 V. City of Lancaster Diamond Time: 9:00 a.m. Farming Co. V. Palmdale Water Dist. Superior Court of 3 California, County of Riverside, consolidated actions, Case No. RIC 353 840, RIC 344 436, RIC 344 4 668 5 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 of the deposition of Blake McCullough-Sanden that was taken in 13 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. 19 /// 20 /// /// 21 22 ///

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

Dated: May 8, 2013

TAYLOR & RING

INC.

By:

James W. Lewis

Attorneys for Cross-Defendants HOLLIDAY ROCK CO., INC., successor in interest to LITTLEROCK AGGREGATE CO., INC. dba ANTELOPE VALLEY AGGREGATE, INC.; THE FRANK AND YVONNE LANE 1993 FAMILY TRUST, DATED MARCH 5, 1993, AS RESTATED JULY 20, 2000, successor in interest to FRANK A. LANE, ROE 612; THE GEORGE AND CHARLENE LANE FAMILY TRUST, Successor in interest to George M. Lane, Roe 316; 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,

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1	James W. Lewis (SBN 207599)	James W. Lewis (SBN 207599)	
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2	10900 Wilshire Boulevard, Suite 920		
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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	י ייטוומיי.	
١	THE FRANK AND YVONNE LANE 1993 FAMI	•	
7	TRUST, DATED MARCH 5, 1993, AS REST		
	JULY 20, 2000; MONTE VISTA BUILDING		
8	a California Corporation; A.V. MATE		
	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.		
12	ANTELOPE VALLET AGGREGATE, INC.		
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	SUPERIOR COURT OF THE S	STATE OF CALIFORNIA	
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	FOR THE COUNTY OF	F LOS ANGELES	
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16	ANTELOPE VALLEY GROUNDWATER CASES	Judicial Council Coordination No.	
T Q		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)) [Assigned to the Honorable Jack	
19	Farming Co. Superior Court of) Komar]	
	California County of Los Angeles,)	
20	Case No. BC 325 201) NOTICE OF TAKING VIDEOTAPED	
0.4	Tog Angolog County Waterwarks 2	TRIAL PRESERVATION DEPOSITION OF	
21	Los Angeles County Waterworks 2 District No. 40 v. Diamong	/ EXPERT WITNESS BLAKE McCULLOUGH-	
2.2	Farming Co. Superior court of	SANDEN	
22	Califronia, County of Kern, Case	<i>)</i> }	
23	No. S-1500-CV-254-348) Date: April 12, 2013	
<u>ی</u> ں) Time: 9:00 a.m.	
24	Wm. Bolthouse Farms, Inc. V. City	<i>)</i>	

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

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

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

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

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Should any party object to the date and time of this deposition, the noticing parties will coordinate a mutually convenient date and time for this deposition.

Dated: April 4, 2013

TAYLOR & RING

By:

James W Lewis Attorneys for Cross-Defendants HOLLIDAY ROCK CO., INC., successor in interest to LITTLEROCK AGGREGATE CO., INC. dba ANTELOPE VALLEY AGGREGATE, INC.; THE FRANK AND YVONNE LANE 1993 FAMILY TRUST, DATED MARCH 5, 1993, AS RESTATED JULY 20, 2000, successor in interest to FRANK A. LANE, ROE 612; THE GEORGE AND CHARLENE LANE FAMILY TRUST, Successor in interest to George M. Lane, Roe 316; 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.

PROOF OF SERVICE (C.C.P. 1013A, 2015.5)

STATE OF CALIFORNIA

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen years and not a party to the within action; my business address is 10900 Wilshire Boulevard, Suite 920, Los Angeles, California 90024.

On April 4, 2013, I served the foregoing document, described as:

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

on the interested parties in this action in the following manner:

X BY ELECTRONIC SERVICE AS FOLLOWS by posting the document(s) listed above to the Santa Clara website in the action of the Antelope Valley Groundwater Litigation, Judicial Council Coordination Proceeding No. 4408, Santa Clara Case No. 1-05-CV-049053.

Executed on April 4, 2013 at Los Angeles, California.

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

James W. Lewis

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PROOF OF SERVICE (C.C.P. 1013A, 2015.5)

STATE OF CALIFORNIA

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen years and not a party to the within action; my business address is 10900 Wilshire Boulevard, Suite 920, Los Angeles, California 90024.

On May 8, 2013, I served the foregoing document, described as:

NOTICE OF INTENTION TO OFFER VIDEO RECORDING OF DEPOSITION AND DEPOSITION OF EXPERT WITNESS BLAKE MCCULLOUGH-SANDEN IN EVIDENCE DURING THE PHASE IV TRIAL OF THIS MATTER

on the interested parties in this action in the following manner:

X BY ELECTRONIC SERVICE AS FOLLOWS by posting the document(s) listed above to the Santa Clara website in the action of the Antelope Valley Groundwater Litigation, Judicial Council Coordination Proceeding No. 4408, Santa Clara Case No. 1-05-CV-049053.

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James W. Lewis