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Attorneys for Cross-Defendant/Cross-Complainant,
A.V. UNITED MUTUAL GROUP; and Cross-
Defendants, ADAMS BENNETT INVESTMENTS,
LLC; MIRACLE IMPROVEMENT CORPORATION
dba GOLDEN SANDS MOBILE HOME PARK, aka
GOLDEN SANDS TRAILER PARK, named as ROE
1121; ST. ANDREW'S ABBEY, INC., named as ROE
623; SERVICE ROCK PRODUCTS, L.P.; and
SHEEP CREEK WATER COMPANY, INC.

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF LOS ANGELES

Coordination Proceeding
Special Title (Rule 1550(b))

) Judicial Council Coordination
) Proceeding No. 4408

**ANTELOPE VALLEY GROUNDWATER
CASES**

) Santa Clara Case No. 1-05-CV-049053
) Assigned to the Honorable Jack Komar
) Department 17C

Including Consolidated Actions:

**Los Angeles County Waterworks District
No. 40 v. Diamond Farming Co.**

Superior Court of California, County of Los
Angeles, Case No. BC 325 201

) **CROSS-DEFENDANT, SERVICE ROCK
PRODUCTS, L.P.'S FIRST
SUPPLEMENTAL DESIGNATION OF
EXPERT WITNESSES PURSUANT TO
JUDGE KOMAR'S DECEMBER 12, 2012
CASE MANAGEMENT ORDER;
DECLARATION OF MICHAEL DUANE
DAVIS, ESQ. IN SUPPORT THEREOF**

**Los Angeles County Waterworks District
No. 40 v. Diamond Farming Co.**

Superior Court of California, County of Kern,
Case No. S-1500-CV-254-348

) [Code of Civil Procedure § 2034.210 et seq.]

**Wm. Bolthouse Farms, Inc. v. City of
Lancaster**

Diamond Farming Co. v. City of Lancaster
**Diamond Farming Co. v. Palmdale Water
Dist.**

Superior Court of California, County of
Riverside, consolidated actions, Case Nos. RIC
353 840, RIC 344 436, RIC 344 668

) Phase 4 Trial Date: February 11, 2013
) Time: 9:00 A.M.
) Dept.: LA County Superior Court., Dept. 1
) Judge: Hon. Jack Komar

AND RELATED ACTIONS.

1 **TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:**

2 Pursuant to Section 2034.210, et seq., of the *Code of Civil Procedure* and the December
3 12, 2012 *Case Management Order For Phase 4 Trial*, issued by the Honorable Jack Komar,
4 Trial Judge, Cross-Defendant, **SERVICE ROCK PRODUCTS, L.P.** ("Service Rock"), by and
5 through its attorneys of record, Michael Duane Davis, Esq., Marlene L. Allen-Hammarlund, Esq.
6 and Derek R. Hoffman, Esq. of Gresham Savage Nolan & Tilden, PC, hereby supplements its
7 designation of witnesses to include the expert witness listed herein. This designation is made
8 according to Section 2034.280 of the *Code of Civil Procedure* in response to expert witness
9 designations made by adverse parties, whose experts may offer opinions on matters for which
10 Service Rock has not previously retained any expert witnesses.

11 A. Service Rock designates the following individual as an expert witness who may
12 be called to testify at the time of trial:

13 1. Charles "Chuck" Roudebush
14 725 Sherwood St.
15 Redlands, CA 92373
16 (909) 472-5206

17 B. Service Rock further reserves the right to call in rebuttal any expert witness on
18 issues which have not yet been disclosed by discovery as well as the right to designate further
19 experts prior to the trial pursuant to 2034.210, et seq. of the *Code of Civil Procedure* and this
20 Court's December 12, 2012 *Case Management Order For Phase 4 Trial*.

21 C. Service Rock further reserves the right to designate expert witnesses in response
22 to any expert witnesses designated by any other party to the above-referenced matter or to
23 impeach the testimony of an expert witness offered by any other party at trial pursuant to *Code of*
24 *Civil Procedure* section 2034.310 et seq. and this Court's December 12, 2012 *Case Management*
25 *Order For Phase 4 Trial*.

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1 D. Service Rock further reserves the right to supplement, augment, modify or change
2 this expert designation as allowed under the *Code of Civil Procedure* and this court's December
3 12, 2012 *Case Management Order For Phase 4 Trial*.

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5 Respectfully submitted,

GRESHAM SAVAGE NOLAN & TILDEN, PC

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7 By: 

MICHAEL DUANE DAVIS, ESQ.

MARLENE L. ALLEN-HAMMARLUND, ESQ.

DEREK R. HOFFMAN, ESQ.

Attorneys for CROSS-DEFENDANT / CROSS-
COMPLAINANT, A. V. UNITED MUTUAL GROUP;
and CROSS-DEFENDANTS, ADAMS BENNETT
INVESTMENTS, LLC, MIRACLE IMPROVEMENT
CORPORATION dba GOLDEN SANDS MOBILE
HOME PARK, aka GOLDEN SANDS TRAILER PARK
[ROE 1121], ST. ANDREW'S ABBEY, INC. [ROE
623], SERVICE ROCK PRODUCTS, L.P., and SHEEP
CREEK WATER COMPANY, INC.

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1 construction industry. He was responsible for overseeing multiple plant-level operations for the
2 production of asphalt and aggregate, maintenance and repair of operational equipment,
3 evaluation and enhancement of operational efficiencies, and the design and construction of any
4 and all improvements deemed necessary to achieve those efficiencies. Additionally, Mr.
5 Roudebush participated in the design and supervision of the construction and operation of a new
6 aggregate processing plant.

7 d. From 1981 to 1986, Mr. Roudebush served as the Operations Manager for
8 South Coast Asphalt. He was responsible for overseeing the operations of asphalt processing,
9 design and construction of improvements to both aggregate and asphalt operations, and the
10 evaluation, testing and design of two new aggregate extraction and processing facilities.

11 e. From 1986 to 2000, Mr. Roudebush served as the Aggregate Operations
12 Manager for C.L. Pharris/Cemex, a Riverside, California company that produces aggregate and
13 concrete for the construction industry. He was responsible for the operations of the aggregate
14 processing facilities, construction and operation of a new aggregate site, and the design,
15 construction and operation of a separate aggregate extraction and processing facilities.

16 f. From 2000 to 2004, Mr. Roudebush served as the Aggregate Operations
17 Manager for Robertson's Ready Mix, a Corona, California company that produces aggregate and
18 ready mix concrete for the construction industry. He was responsible for overseeing regional
19 operations for the aggregate processing plants, complete construction of a new aggregate
20 processing plant and design construct modifications to this plant to improve the efficiencies of
21 process water usage. Mr. Roudebush also participated in the design and supervision of the
22 construction and operations of two new aggregate processing facilities.

23 g. Following his retirement in 2004, Mr. Roudebush has consulted to the
24 aggregates industry, serving industry leaders such as Robertson's Ready Mix and Nevada Ready
25 Mix, advising on design and operational efficiency improvements in all aspects of aggregate
26 operations, design and construction oversight of new aggregates facilities and the design and
27 oversight of construction to improve the efficiency of existing aggregates facilities.

1 h. Mr. Roudebush was elected in 1995 to the Executive Committee of the
2 Board of Directors of the Southern California Rock Products Association ("SCRPA"), during
3 which time he served as an officer for three years. In that capacity he assisted members with
4 legislative and regulatory issues, and the education of members on numerous matters affecting
5 aggregates operations. Following the 2006 merger of SCRPA with the Construction Materials
6 Association of California ("CMAC"), Southern California Ready Mixed Concrete Association
7 ("SCRMCA") and the California Mining Association (CMA") into CALCIMA, Mr. Roudebush
8 was elected to the Executive Committee of the Governing Board of Directors of CalcIMA, a
9 position that he holds to the present. CalcIMA is the statewide trade association for the
10 construction and industrials minerals industries in California, which includes aggregates,
11 industrial minerals and ready mixed concrete producers. As a member of the Executive Board,
12 Mr. Roudebush is actively involved in CalcIMA's programs that offer extensive information on
13 aggregates, industrial minerals and ready mixed concrete to the public, government, education,
14 business, media, its members and other organizations; address legislative and regulatory issues
15 affecting the industry; provide members with safety, technical and compliance training; and
16 provide other trade industry services to the aggregates, industrial minerals and ready mixed
17 cement industries throughout California.

18 4. Mr. Roudebush will testify on issues relative to the aggregates, industrial minerals
19 and ready mixed cement industries in California, with an emphasis on Southern California,
20 including the use of water in aggregates and ready mixed concrete operations. He will also rebut
21 testimony offered by other experts designated in this matter.

22 5. Mr. Roudebush has agreed to testify at trial.

23 6. Mr. Roudebush will be sufficiently familiar with the pending action to submit to a
24 meaningful oral deposition testimony, including any opinions and their basis concerning the
25 testimony that he is expected to give at trial.


26 7. Mr. Roudebush will be available to testify following the testimony of all initially
27 designated experts.

8. At this time, Mr. Roudebush has not prepared any reports to be produced pursuant to Section 2034.270 of the *Code of Civil Procedure*. Any report prepared by Mr. Roudebush subsequent to this designation will be available three days prior to his deposition as provided by this Court's December 12, 2012 *Case Management Order for Phase 4 Trial*.

9. Mr. Roudebush's rate for deposition testimony is \$350.00 per hour, plus travel expenses.

I declare under the penalty of perjury that the foregoing is true and correct under the laws of the State of California, and if called upon, I could and would testify competently thereto.

Executed this 11th day of January, 2013, in Riverside, California.


MICHAEL DUANE DAVIS, ESQ.

MICHAEL DUANE DAVIS, ESQ.

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**PROOF OF SERVICE
STATE OF CALIFORNIA, COUNTY OF RIVERSIDE**

Re: *ANTELOPE VALLEY GROUNDWATER CASES*

Los Angeles County Superior Court Judicial Council Coordinated
Proceedings No. 4408; Santa Clara County Superior Court Case No. 1-05-CV-049053

I am employed in the County of Riverside, State of California. I am over the age of 18 years and not a party to the within action; my business address is: 3750 University Avenue, Suite 250, Riverside, CA 92501-3335.

On January 11, 2013, I served the foregoing document(s) described as **CROSS-DEFENDANT, SERVICE ROCK PRODUCTS, L.P.'S FIRST SUPPLEMENTAL DESIGNATION OF EXPERT WITNESSES PURSUANT TO JUDGE KOMAR'S DECEMBER 12, 2012 CASE MANAGEMENT ORDER; DECLARATION OF MICHAEL DUANE DAVIS, ESQ. IN SUPPORT THEREOF** on the interested parties in this action in the following manner:

(X) **BY ELECTRONIC SERVICE** – I posted the document(s) listed above to the Santa Clara County Superior Court website, <http://www.scefiling.org>, in the action of the Antelope Valley Groundwater Cases,

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

Executed on January 11, 2013, at Riverside, California.


EDWIN CARRANZA