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Attorneys for Cross-Defendant, ADAMS  
BENNETT INVESTMENTS, LLC; Cross-  
Defendants and Cross-Complainants, ANTELOPE  
VALLEY UNITED MUTUALS GROUP  
[comprised of Antelope Park Mutual Water Co.,  
Aqua-J Mutual Water Co., Averydale Mutual Water  
Co., Baxter Mutual Water Co., Bleich Flat Mutual  
Water Co., Colorado Mutual Water Co., Eldorado  
Mutual Water Co., Evergreen Mutual Water Co.,  
Land Projects Mutual Water Co., Landale Mutual  
Water Co., Shadow Acres Mutual Water Co.,  
Sundale Mutual Water Co., Sunnyside Farms  
Mutual Water Co., Tierra Bonita Mutual Water Co.,  
Westside Park Mutual Water Co. and White Fence  
Farms Mutual Water Co.]; and Cross-Defendants,  
MIRACLE IMPROVEMENT CORPORATION  
DBA GOLDEN SANDS MOBILE HOME PARK,  
AKA GOLDEN SANDS TRAILER PARK,  
NAMED AS ROE 1121; SAINT ANDREW'S  
ABBAY, INC., NAMED AS ROE 623; SERVICE  
ROCK PRODUCTS, L.P.; and SHEEP CREEK  
WATER COMPANY

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**IN AND FOR THE COUNTY OF LOS ANGELES**

Coordination Proceeding  
Special Title (Rule 1550(b))

**ANTELOPE VALLEY GROUNDWATER  
CASES**

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

**CAPTION CONTINUED ON NEXT PAGE**

Judicial Council Coordination  
Proceeding No. 4408

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

**WITNESS LIST OF CROSS-  
DEFENDANT, SAINT ANDREW'S  
ABBAY, INC., NAMED AS ROE 623 IN  
SUPPORT OF PROVE-UP TRIAL**

**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

**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

AND RELATED ACTIONS.

**PROVE-UP**

Trial Date: August 3, 2015  
Time: 10:00 A.M.  
Dept.: Dept. 1, Los Angeles  
Judge: Hon. Jack Komar

Cross-Defendant / Cross-Complainant **SAINT ANDREW'S ABBEY, INC., NAMED AS ROE 623** ("St. Andrews") by and through its counsel of record, Michael Duane Davis, Marlene L. Allen-Hammarlund, and Derek R. Hoffman, of GRESHAM SAVAGE NOLAN & TILDEN, PC, submits this Witness List should it be required to present testimony and/or evidence, with respect to the Prove-Up Trial.

1. Father Francis Benedict, Abbot Emeritus and Properties Manager, Non-Expert
2. Robert A. Krieger, California Licensed Professional Engineer (RCE 15255), Expert

At the Phase IV Trial, St. Andrews marked and secured the admission of evidence (documents and information) to establish their organizational status, service areas, groundwater wells and infrastructure, groundwater production, imported water purchases, capture and pumping of return flow rights from the imported water, and their intent to produce groundwater and import water into the Antelope Valley Groundwater Basin in the future.

To the extent that the Court determines that the evidence that was admitted in the Phase IV Trial was admitted only for a limited purpose, St. Andrews intend to move to re-admit the documents and to call the designated non-expert witness to establish its organizational status, service areas, groundwater wells and infrastructure, groundwater production, imported water

1 purchases, capture and pumping of return flow rights from the imported water, and intent to  
2 produce groundwater and import water into the Antelope Valley Groundwater Basin in the future  
3 for the purposes of the Prove-Up Trial.

4 At this time, St. Andrews estimates that the testimony will encompass approximately one  
5 (1) hour of time.

6 St. Andrews also reserves the right to call, depending upon their testimony on direct  
7 examination, the following expert witnesses at the Prove-Up of the Stipulated Judgment and  
8 Physical Solution Trial:

9 1. Dennis Williams (non-retained shared expert witness with Public Water Suppliers – as  
10 regards the Physical Solution).

11 2. Robert Beeby (non-retained shared expert witness with Public Water Suppliers – as  
12 regards reasonable and beneficial use of water).

13 3. Robert Wagner (non-retained shared expert witness with AVEK and Overlying  
14 Landowners – as regards the physical solution).

15 4. Charles Binder (non-retained shared expert witness with AVEK and Overlying  
16 Landowners – as regards the physical solution).

17 5. David Peterson (non-retained shared expert witness with AVEK and Overlying  
18 Landowners – as to the issues of reasonable and beneficial use of water).

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1 At this time, St. Andrews cannot provide an estimate of time for the above non-retained  
2 shared expert witnesses.

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4 DATED: April 24, 2015

GRESHAM SAVAGE NOILAN & TILDEN PC

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8 By: \_\_\_\_\_

9 MICHAEL DUANE DAVIS, ESQ.  
10 MARLENE L. ALLEN-HAMMARLUND, ESQ.  
11 DEREK R. HOFFMAN, ESQ.  
12 Attorneys for Cross-Defendant, ADAMS BENNETT  
13 INVESTMENTS, LLC; Cross-Defendants and Cross-  
14 Complainants, ANTELOPE VALLEY UNITED  
15 MUTUALS GROUP [comprised of Antelope Park  
16 Mutual Water Co., Aqua-J Mutual Water Co., Averydale  
17 Mutual Water Co., Baxter Mutual Water Co., Bleich Flat  
18 Mutual Water Co., Colorado Mutual Water Co., Eldorado  
19 Mutual Water Co., Evergreen Mutual Water Co., Land  
20 Projects Mutual Water Co., Landale Mutual Water Co.,  
21 Shadow Acres Mutual Water Co., Sundale Mutual Water  
22 Co., Sunnyside Farms Mutual Water Co., Tierra Bonita  
23 Mutual Water Co., Westside Park Mutual Water Co. and  
24 White Fence Farms Mutual Water Co.]; and Cross-  
25 Defendants, MIRACLE IMPROVEMENT  
26 CORPORATION DBA GOLDEN SANDS MOBILE  
27 HOME PARK, AKA GOLDEN SANDS TRAILER  
28 PARK, NAMED AS ROE 1121; SAINT ANDREW'S  
ABBEY, INC., NAMED AS ROE 623; SERVICE  
ROCK PRODUCTS, L.P.; and SHEEP CREEK WATER  
COMPANY

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**PROOF OF SERVICE**  
**STATE OF CALIFORNIA, COUNTY OF SAN BERNARDINO**

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

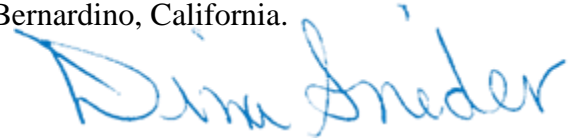
I am employed in the County of San Bernardino, State of California. I am over the age of 18 years and not a party to the within action; my business address is: 550 East Hospitality Lane, Suite 300, San Bernardino, CA 92408-4205.

On April 24, 2015, I served the foregoing document(s) described as **WITNESS LIST OF CROSS-DEFENDANT, SAINT ANDREW'S ABBEY, INC., NAMED AS ROE 623 IN SUPPORT OF PROVE-UP TRIAL** 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 April 24, 2015, at San Bernardino, California.



DINA M. SNIDER