

Michael Duane Davis, SBN 093678
Marlene L. Allen-Hammarlund, SBN 126418
Derek R. Hoffman, SBN 285784
GRESHAM SAVAGE NOLAN & TILDEN, PC
3750 University Avenue, Suite 250
Riverside, CA 92501-3335
Telephone: (951) 684-2171
Facsimile: (951) 684-2150

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, SHEEP CREEK WATER
COMPANY, NAMED AS ROE 1121 IN
SUPPORT OF PROVE-UP TRIAL**

1 **Los Angeles County Waterworks District No.**
2 **40 v. Diamond Farming Co.**

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

5 **Wm. Bolthouse Farms, Inc. v. City of**
6 **Lancaster**
7 **Diamond Farming Co. v. City of Lancaster**
8 **Diamond Farming Co. v. Palmdale Water**
9 **Dist.**

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

13 AND RELATED ACTIONS.

PROVE-UP

Trial Date: August 3, 2015

Time: 10:00 A.M.

Dept.: Dept. 1, Los Angeles

Judge: Hon. Jack Komar

14 Cross-Defendant / Cross-Complainant **SHEEP CREEK WATER COMPANY** ("Sheep
15 Creek") by and through its counsel of record, Michael Duane Davis, Marlene L. Allen-
16 Hammarlund, and Derek R. Hoffman, of GRESHAM SAVAGE NOLAN & TILDEN, PC,
17 submits this Witness List should it be required to present testimony and/or evidence, with respect
18 to the Prove-Up Trial.

19 1. Chris Cummings, General Manager

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

25 To the extent that the Court determines that the evidence that was admitted in the Phase
26 IV Trial was admitted only for a limited purpose, Sheep Creek intend to move to re-admit the
27 documents and to call the designated non-expert witness to establish its organizational status,
28 service areas, groundwater wells and infrastructure, groundwater production, imported water
purchases, capture and pumping of return flow rights from the imported water, and intent to
produce groundwater and import water into the Antelope Valley Groundwater Basin in the future

1 for the purposes of the Prove-Up Trial.

2 At this time, Sheep Creek estimates that the testimony will encompass approximately
3 thirty (30) minutes of time.

4 Sheep Creek also reserves the right to call, depending upon their testimony on direct
5 examination, the following expert witnesses at the Prove-Up of the Stipulated Judgment and
6 Physical Solution Trial:

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

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

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

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

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

17
18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

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

3
4 DATED: April 24, 2015

GRESHAM SAVAGE NOLAN & THOMPSON, PC



7
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

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

On April 24, 2015, I served the foregoing document(s) described as **WITNESS LIST OF CROSS-DEFENDANT, SHEEP CREEK WATER COMPANY IN SUPPORT OF PROVE-UP TRIAL** on the interested parties in this action in the following manner:

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

Bernardino, California.

**WITNESS LIST OF SHEEP CREEK WATER COMPANY
IN SUPPORT OF PROVE-UP TRIAL**