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Attorneys for Craig Van Dam

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
 COUNTY OF LOS ANGELES**

Coordination Proceeding  
 Special Title (Rule 1550(b))

**ANTELOPE VALLEY  
 GROUNDWATER CASES**

**Included Actions:**

Los Angeles County Waterworks District  
 No. 40 v. Diamond  
 FARMING/IRRIGATION Co.  
 Superior Court of California  
 County of Los Angeles, Case No. BC  
 325201

Los Angeles County Waterworks District  
 No. 40 v. Diamond  
 FARMING/IRRIGATION Co.  
 Superior Court of California, County of  
 Kern, Case No. S-1500-CV 254348

Wm. Bolthouse Farms, Inc. v. City of  
 Lancaster Diamond  
 FARMING/IRRIGATION Co. v. City of  
 Lancaster Diamond  
 FARMING/IRRIGATION Co. v. Palmdale  
 Water Dist. Superior Court of California,  
 County of Riverside, consolidated actions,  
 Case Nos. RIC 353840, RIC 344436, RIC  
 344668

Judicial Council Coordination Proceeding  
 No. 4408

SC Case No. 105CV 049053  
 Assigned to Hon. Jack Komar

**CRAIG VAN DAM'S IDENTIFICATION  
 OF NON-EXPERT WITNESSES  
 PURSUANT TO CASE MANAGEMENT  
 ORDER**

**Date of Exchange: January 4, 2013  
 Trial Date: February 11, 2013**

1 TO ALL PARTIES IN INTEREST:

2 NOTICE IS HEREBY GIVEN that CRAIG VAN DAM designates the following non-  
3 expert witnesses he may call at trial in the above-entitled action to offer non-expert opinions  
4 based on his personal observations and experience related to his current groundwater production  
5 for the calendar year 2011 and January 1 through November 30, 2012, and proof of claimed  
6 reasonable and beneficial use of water for each parcel to be adjudicated:

7 **NON- EXPERT WITNESS**

- 8  
9 1. Craig Van Dam  
10 7316 West D-8  
11 Lancaster, CA 93536

12 CRAIG VAN DAM is available for deposition during January 10-31, 2013, on the  
13 following dates: January 18, 28, 22, 23, 2013.

- 14 2. Rick Koch  
15 Southern California Edison  
16 Technical Specialist  
17 10180 Telegraph Rd.  
18 Ventura, CA 93004

19 Mr. Koch is available for deposition during January 10-31, 2013, on the following  
20 dates: January 21-25, 2013.

21 CRAIG VAN DAM also designates any witness whose testimony may be regarded as non-  
22 expert whose name has been revealed by discovery or further discovery in this action, and those  
23 non-experts who may be designated by other parties to this action.

24 CRAIG VAN DAM also reserves his rights and all other constitutional, statutory and/or  
25 common law rights he may have, to name other non-experts before trial or to call to testify at trial  
26 non-experts not named, whose testimony is needed to aid in the prosecution of this action and/or  
27 refute and rebut the contentions and testimony of any other non-expert.

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Dated: January 4, 2013

THE LAW OFFICES OF YOUNG WOOLDRIDGE, LLP

By:



SCOTT K. KUNEY, Esq., Attorneys for  
CRAIG VAN DAM

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## PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF KERN

I, ERIN L. LINDSEY, declare: I am and was at the times of the service hereunder mentioned, over the age of eighteen (18) years, and not a party to the within cause. My business address is 1800 30th Street, Fourth Floor, Bakersfield, CA 93301.

On January 4, 2013, I caused the below listed document(s) entitled as: **CRAIG VAN DAM'S IDENTIFICATION OF NON-EXPERT WITNESSES PURSUANT TO CASE MANAGEMENT ORDER** to be served on the parties via the following service:

X (BY POSTING) I posted the document listed above to the Santa Clara Superior Court website regarding the Antelope Valley Groundwater matter pursuant to the Court's Clarification Order. Electronic service posting completed through [www.scefilings.org](http://www.scefilings.org).

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

Executed on January 4, 2013, at Bakersfield, California.

  
ERIN L. LINDSEY