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Attorneys for WDS California II, LLC

**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

**WDS CALIFORNIA II, LLC'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 WDS CALIFORNIA II, LLC (hereinafter "WDS")
3 designates the following non-expert witnesses it may call at trial in the above-entitled action to
4 offer non-expert opinions based on their personal observations and experience related to WDS's
5 current groundwater production for the calendar year 2011 and January 1 through November 30,
6 2012, and proof of claimed reasonable and beneficial use of water for each parcel to be
7 adjudicated:

8 **NON- EXPERT WITNESSES**

- 9
- 10 1. David Dorrance
11 Western Development & Storage
12 5700 Wilshire Blvd., Ste. 330
13 Los Angeles, CA 90036
- 14 2. Andrew Werner
15 Western Development & Storage
16 5700 Wilshire Blvd., Ste. 330
17 Los Angeles, CA 90036

18 David Dorrance is available for deposition during January 10-31, 2013, except for the
19 following dates: January 15, 17, 29, 31, 2013.

20 Andrew Werner is available for deposition during January 10-31, 2013, except for the
21 following dates: January 10, 11, 15, 17, 29, 31, 2013.

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

25 WDS also reserves its rights and all other constitutional, statutory and/or common law
26 rights it may have, to name other non-experts before trial or to call to testify at trial non-experts
27 not named, whose testimony is needed to aid in the prosecution of this action and/or refute and
28 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 Cross-
Defendant WDS CALIFORNIA II, LLC

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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: **WDS CALIFORNIA LLC'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.scefilng.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