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Attorneys for Delmar D. Van Dam, Gertrude J. Van Dam, and Gary 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

**DELMAR D. VAN DAM, GERTRUDE J.  
VAN DAM, AND GARY 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 DELMAR D. VAN DAM, GERTRUDE J. VAN  
3 DAM, AND GARY VAN DAM (collectively, "VAN DAMS"), designate the following non-  
4 expert witnesses they may call at trial in the above-entitled action to offer non-expert opinions  
5 based on their personal observations and experience related to their current groundwater  
6 production for the calendar year 2011 and January 1 through November 30, 2012, and proof of  
7 claimed reasonable and beneficial use of water for each parcel to be adjudicated:

8 **NON- EXPERT WITNESS**

- 9  
10 1. Gary Van Dam  
11 High Desert Dairy  
12 7304 East Avenue F  
13 Lancaster, CA 93535

14 Gary Van Dam is available for deposition during January 10-31, 2013, on the following  
15 dates: January 18, 21-25, 28, 2013.

- 16 2. Rick Koch  
17 Southern California Edison  
18 Technical Specialist  
19 10180 Telegraph Rd.  
20 Ventura, CA 93004

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

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


26 VAN DAMS also reserve their rights and all other constitutional, statutory and/or  
27 common law rights they may have, to name other non-experts before trial or to call to testify at  
28 trial non-experts not named, whose testimony is needed to aid in the prosecution of this action

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and/or refute and rebut the contentions and testimony of any other non-expert.

Dated: January 4, 2013

THE LAW OFFICES OF YOUNG WOOLDRIDGE, LLP

By:   
SCOTT K. KUNEY, Esq., Attorneys for  
DELMAR D. VAN DAM, GERTRUDE J. VAN DAM,  
and GARY 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: **DELMAR D. VAN DAM, GERTRUDE J. VAN DAM, AND GARY 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.scefilng.org](http://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