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 Facsimile 661-327-0720
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SCOTT K. KUNEY, Esq., SBN 111115 ERNEST A. CONANT, Esq., SBN 089111 THE LAW OFFICES OF YOUNG WOOLDRIDGE, LLP 1800 30th Street, Fourth Floor Bakersfield, CA 93301 Telephone: (661) 327-9661 Facsimile: (661) 327-0720

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 <u>FIRST</u>
<u>SUPPLEMENTAL</u> IDENTIFICATION OF
NON-EXPERT WITNESSES PURSUANT
TO CASE MANAGEMENT ORDER

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

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TO ALL PARTIES IN INTEREST:

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

NON- EXPERT WITNESS

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

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

2. Rick Koch Southern California Edison **Technical Specialist** 10180 Telegraph Rd. Ventura, CA 93004

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

3. Carl F. Voss, Jr. c/o LeBeau Thelen, LLP 5001 East Commerce Center Drive Bakersfield, CA 93309

Our understanding is Mr. Voss is available for deposition on January 10, 2013.

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

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

Dated: January <u>1</u>, 2013

THE LAW OFFICES OF YOUNG WOOLDRIDGE, LLP

By:

SCOTT K. KUNEY, Esq., Attorneys

CRAIG VAN DAM

Young Wooldridge, LLP

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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 3, 2013, I caused the below listed document(s) entitled as: CRAIG VAN DAM'S FIRST SUPPLEMENTAL IDENTIFICATION OF NON-EXPERT WITNESSES PURSUANT TO CASE MANAGEMENT ORDER to be served on the parties via the following service:

<u>X</u> (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.scefiling.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 3, 2013, at Bakersfield, California.

ERIN L. LINDSEN