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7 Mountains Conservancy, and State of California
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EXEMPT FROM FILING FEES
[Gov. Code, § 6103]

8
9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 CLERK OF THE COURT

11 **Coordination Proceeding**
12 **Special Title (Rule 3.550(c))**

13 **ANTELOPE VALLEY GROUNDWATER**
14 **CASES**
15 **Included Actions:**

16 **Los Angeles County Waterworks District**
17 **No. 40 v. Diamond Farming Co.**
18 **Superior Court of California County of Los**
19 **Angeles, Case No. BC 325 201**

20 **Los Angeles County Waterworks District**
21 **No. 40 v. Diamond Farming Co.**
22 **Superior Court of California County of**
23 **Kern, Case No. S-1500-CV-254-348**

24 **Wm. Bolthouse Farms, Inc. v. City of**
25 **Lancaster, Diamond Farming Co. v. City of**
26 **Lancaster, Diamond Farming Co. v.**
27 **Palmdale Water Dist. Superior Court of**
28 **California, County of Riverside,**
consolidated Actions, Case Nos. RIC 353
840, RIC 344 436, RIC 344 668

AND RELATED ACTIONS.

Judicial Council Coordination
Proceeding No. 4408

Santa Clara Case No. 1-05-CV-049053

STATE OF CALIFORNIA, SANTA
MONICA MOUNTAINS
CONSERVANCY, AND STATE OF
CALIFORNIA 50TH DISTRICT
AGRICULTURAL ASSOCIATION'S
DESIGNATION OF NON-EXPERT
WITNESSES

[Assigned for All Purposes to the Honorable
Jack Komar]

Date: February 11, 2013
Time: 9:00 a.m.
Dept: 1

Action Filed: October 26, 2005

1 PLEASE TAKE NOTICE that the STATE OF CALIFORNIA, ON BEHALF OF SANTA
2 MONICA MOUNTAINS CONSERVANCY, STATE OF CALIFORNIA 50TH DISTRICT
3 AGRICULTURAL ASSOCIATION, AND ALL OTHER STATE AGENCIES OWNING LAND
4 WITHIN THE ANTELOPE VALLEY ADJUDICATION AREA (hereafter referred to as “State
5 of California”) makes the following designation of non-expert witnesses as required by
6 Paragraphs 2 and 3 of the Case Management Order for Phase 4 Trial and the Discovery Order for
7 Phase 4 Trial.

8 To the extent these designated witnesses for the following state agencies are deemed to be
9 non- retained experts required to render an expert opinion, the designations herein are deemed to
10 constitute compliance with the Case Management Order and the Code of Civil Procedure for a
11 written exchange of expert witnesses. This list does not include any rebuttal witnesses the State
12 of California may need, and the State of California reserves its right to later name experts before
13 trial, to call experts designated by other parties, to call supplemental experts, and to supplement
14 this designation. The State of California, through the Attorney General’s Office, will work with
15 all parties to make its witnesses available for deposition at the best possible date and time for all
16 involved if necessary.

17 The State of California reserves the right to call the witnesses listed below regarding the
18 following issues: Ownership or control of the properties in the adjudication area, the uses,
19 including the reasonable and beneficial use of the water, the amount of water pumped, the amount
20 of water purchased in lieu of pumping, if necessary, and the importance of the aqueduct liner
21 protection pumping and its designation as non-consumptive use, including the consequences of
22 not pumping that water, if necessary.

23
24 1. California State Lands Commission: Brian Bugsch, Chief of the Lands Management
25 Division. Not available January 14 and January 21, 2013.

26 2. California Santa Monica Mountains Conservancy: Rorie Skei, Chief Deputy Director
27 for the Santa Monica Mountains Conservancy. Availability-TBD.
28

1 3. California Department of the Military: Lorren T. Deakin, Maj, En. Construction and
2 Facilities Management Officer. Availability-TBD

3 4. California Department of Corrections and Rehabilitation: Daniel Robbins, Water and
4 Sewer Plant Supervisory, California Department of Corrections and Rehabilitation. Availability-
5 TBD

6 5. California Department of Veterans Affairs: David R. Gerard, Assistant Deputy
7 Secretary, Capital Assets, California Department of Veterans Affairs. Availability-TBD

8 6. California 50th District Agricultural Association: Daniel P. Jacobs, Chief Executive
9 Officer, Fiftieth (50th) District Agricultural Association. Available on January 14, 15, 24-31.

10 7. California Department of Parks and Recreation: Russell Dingman, Staff
11 Environmental Planner, CA State Parks-Tehachapi District, Lancaster, CA 93536. Availability-
12 TBD

13 8. California Department of Water Resources: Francisco Llamas, Associate
14 HydroElectric Power Utility Engineer, Southern Field Division-availability TBD; Raymond
15 Ramirez, Hydroelectric Power Electrician II, Division of Operation and Maintenance, Southern
16 Field Division, availability TBD; John Bunce, Acting Field Division Chief, Southern Field
17 Division, available January 14, 15, 17, 18, 22, 24-31; Bonnie Duecker, Southern Field Division,
18 Operations Branch, Water Operations Section- available January 14-31, except January 21, 2013.

19 9. California Department of Transportation: R. Steve Miller, District 9, Landscape
20 Architect, District Safety Roadside Rest Area Coordinator, availability January 14-31, except
21 January 10 and January 21, 2013; Dana Hendrix, Lancaster Maintenance Station, District 7-
22 availability TBD; Paul Caron, District 7 Environmental-availability-TBD; Nancy Escallier,
23 District 9 Right of Way Office Chief-availability-TBD. Possibility of additional witnesses.

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1 10. California Highway Patrol: Andria Witmer, Captain, California Highway Patrol,
2 Bishop; Available January 10-18, January 22-24, January 28 and January 31.

3
4 Dated: January 4, 2013

Respectfully Submitted,

5 KAMALA D. HARRIS
6 Attorney General of California
7 RICHARD M. MAGASIN
8 Supervising Deputy Attorney General
9 MARILYN H. LEVIN
10 NOAH GOLDEN-KRASNER
11 Deputy Attorneys General



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13 *Attorneys for State of California, Santa*
14 *Monica Mountains Conservancy, and State*
15 *of California 50th District Agricultural*
16 *Association*

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CERTIFICATE OF SERVICE

Case Name: **Antelope Valley Groundwater
Cases**

No. **JCCP 4408**

I hereby certify that on January 4, 2013, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

**STATE OF CALIFORNIA, SANTA MONICA MOUNTAINS CONSERVANCY, AND
STATE OF CALIFORNIA 50TH DISTRICT AGRICULTURAL ASSOCIATION'S
DESIGNATION OF NON-EXPERT WITNESSES**

I certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on January 4, 2013, at Los Angeles, California.

TINA M. HOUSTON
Declarant


Signature