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EXEMPT FROM FILING FEES  
[Gov. Code, § 6103]

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 CLERK OF THE COURT  
10  
11

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

14 **ANTELOPE VALLEY GROUNDWATER**  
15 **CASES**

16 **Included Actions:**

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

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

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

25 -----  
26 **AND RELATED ACTIONS.**  
27  
28

Judicial Council Coordination  
Proceeding No. 4408

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

STATE OF CALIFORNIA AND 50<sup>TH</sup>  
DISTRICT AGRICULTURAL  
ASSOCIATION'S DESIGNATION OF  
NON-EXPERT AND EXPERT WITNESSES

[Assigned for All Purposes to the Honorable  
Jack Komar]

Date: August 3, 2015  
Time: 10:00 a.m.  
Dept: 1

Action Filed: October 26, 2005

1 PLEASE TAKE NOTICE that the STATE OF CALIFORNIA, ON BEHALF OF THE  
2 STATE OF CALIFORNIA AND THE 50TH DISTRICT AGRICULTURAL ASSOCIATION,  
3 AND ALL OTHER STATE AGENCIES OWNING LAND WITHIN THE ANTELOPE  
4 VALLEY ADJUDICATION AREA (hereafter referred to as "State of California") submits the  
5 following designation of witnesses pursuant to this Court's Second Amended Case Management  
6 Order dated March 27, 2015.

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

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

22 **Retained Experts:**

23 1. W. Greg Hamer, Senior Associate Hydrogeologist, AMEC Environment & Infrastructure,  
24 Inc.

25 a. Qualifications: Mr. Hamer is a Certified Hydrogeologist, Engineering Geologist and  
26 Professional Geologist in the State of California. He has performed and managed water-resources  
27 investigations and environmental studies for more than 30 years.

1           b.     Substance of Testimony: Depending upon further clarification of the scope of the  
2 August 3, 2015 Trial and if required for this Phase of Trial, Mr. Hamer has been asked to testify  
3 concerning the amount of groundwater production and use for state owned, operated and/or  
4 controlled property overlying the Antelope Valley Groundwater Basin, including the reasonable  
5 and beneficial use of the water and the amount of water purchased in lieu of pumping. Mr.  
6 Hamer will be testifying concerning these issues as related to numerous state agencies, including  
7 the California Department of Water Resources, the California Department of Transportation, and  
8 the California Department of Parks and Recreation, the 50<sup>th</sup> District Agricultural Association, the  
9 California Highway Patrol, the California Department of Veterans Affairs, the California  
10 Department of Corrections and Rehabilitation, the California State Lands Commission and the  
11 California Department of the Military.

12           c.     Agreement to Testify: Mr. Hamer has agreed to testify at the August 3, 2015 trial.

13           d.     Familiarity with action: Mr. Hamer is sufficiently familiar with this pending action to  
14 provide the Court with relevant testimony, including any opinion and its basis.

15       2.     Harold Leverenz, P.E., PhD. UC, Davis

16           a.     Qualifications: Mr. Leverenz is a Registered Civil Engineer in California, License  
17 No. C 71328. Between 2006-2008, he worked with California Department of Transportation  
18 Water and Wastewater staff to develop onsite wastewater treatment systems for safety roadside  
19 rest areas including collection and analysis of data, development of design criteria, models,  
20 process design and selection reports.

21           b.     Substance of Testimony: Mr. Leverenz has been asked to testify concerning the  
22 amount of groundwater production and use for state owned, operated and/or controlled property  
23 of the California Department of Transportation overlying the Antelope Valley Groundwater  
24 Basin, including the reasonable and beneficial use of the water.

25           c.     Agreement to Testify: Mr. Leverenz has agreed to testify at the August 3, 2015 trial.

26           d.     Familiarity with action: Mr. Leverenz is sufficiently familiar with this pending action  
27 to provide the Court with relevant testimony, including any opinion and its basis.  
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1 **Non-retained Experts:**

2 1. Mr. Robert Pierotti, Supervising Engineering Geologist with the California  
3 Department of Water Resources (DWR), Southern Region Office.

4 a. Qualifications: Mr. Pierotti is a California Professional Geologist, a California  
5 Certified Engineering Geologist and a California Certified Hydrogeologist. Mr. Pierotti testified  
6 previously regarding the State of California's position on Antelope Valley Groundwater Basin  
7 Boundaries.

8 b. Substance of Testimony: Mr. Pierotti has been asked to testify regarding location of  
9 state owned, operated and/or controlled property overlying the Antelope Valley Groundwater  
10 Basin.

11 c. Agreement to testify: Mr. Pierotti has agreed to testify at the August 3, 2015 trial.

12 d. Familiarity with action: Mr. Pierotti is sufficiently familiar with this pending action  
13 to provide the Court with relevant testimony, including any opinion and its basis.

14 2. Mr. Blaine Laumbach, Hydroelectric Plant Operations Superintendent, Southern Field  
15 Division, California Department of Water Resources.

16 a. Qualifications: Mr. Laumbach is the Lead Planner/Scheduler for the Southern Field  
17 Division and the Hydroelectric Plant Operations Superintendent. He has 33 years of experience  
18 with the Department of Water Resources and is responsible for leading a team of operations,  
19 maintenance and support employees. He is familiar with the Oso Pumping Plant and the Alamo  
20 Powerplant and is responsible for the operational activities of facilities supplying water and/or  
21 power to various contractors in and out of the Southern Field Division.

22 b. Substance of Testimony: Mr. Laumbach has been asked to testify regarding the  
23 amount of groundwater production and use on state owned, operated or controlled property of the  
24 California Department of Water Resources overlying the Antelope Valley Groundwater Basin,  
25 including the reasonable and beneficial use of the water, and the importance of aqueduct liner  
26 protection pumping and the consequences of not pumping that water.

27 c. Agreement to testify: Mr. Laumbach has agreed to testify at the August 3, 2015 trial.  
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1 d. Familiarity with action: Mr. Laumbach is sufficiently familiar with this pending  
2 action to provide the Court with relevant testimony, including any opinion and its basis.

3 3. Ms. Nancy Escallier: Senior Right of Way Agent, District 9 Office Chief, California  
4 Department of Transportation.

5 a. Qualifications: Ms. Escallier has a BS Degree in Managerial Economics from UC  
6 Davis and has 23 years of experience as a Right of Way Agent for the California Department of  
7 Transportation, including 13 years as the District 9 Office Chief of Right of Way.

8 b. Substance of Testimony: Ms. Escallier has been asked to testify regarding ownership  
9 and location of state owned, operated and/or controlled property of the California Department of  
10 Transportation overlying the Antelope Valley Groundwater Basin.

11 c. Agreement to testify: Ms. Escallier has agreed to testify at the August 3, 2015 trial.

12 d. Familiarity with action: Ms. Escallier is sufficiently familiar with this pending action  
13 to provide the Court with relevant testimony.

14 4. Mr. Jerome Marcotte: Senior Sanitary Engineer, California Department of Transportation.

15 a. Qualifications: Mr. Marcotte is a Senior Sanitary Engineer, Division of Engineering  
16 Services, Water and Wastewater Branch. He is a Professional Engineer in Civil Engineering, CA  
17 36844, July 22, 1983. He has been engaged in the planning and design of water and wastewater  
18 facilities for the last 34 years.

19 b. Substance of Testimony: Mr. Marcotte has been asked to testify regarding the  
20 amount of groundwater production and use on state owned, operated or controlled property of the  
21 California Department of Transportation overlying the Antelope Valley Groundwater Basin,  
22 including the reasonable and beneficial use of the water.

23 c. Agreement to testify: Mr. Marcotte has agreed to testify at the August 3, 2015 trial.

24 d. Familiarity with action: Mr. Marcotte is sufficiently familiar with this pending action  
25 to submit to a meaningful oral deposition concerning the specific testimony.

26 **Non-expert witnesses**

27 The State also designates the following additional persons as non-expert witnesses:  
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1           1.     California Department of Water Resources: Francisco Llamas, Associate  
2     HydroElectric Power Utility Engineer, Southern Field Division; Raymond Ramirez,  
3     Hydroelectric Power Electrician II, Division of Operation and Maintenance, Southern Field  
4     Division; John Bunce, Field Division Chief, Southern Field Division; Bonnie Duecker, Southern  
5     Field Division, Operations Branch, Water Operations Section; Reed Barnes, Utility Craftsworker  
6     Supervisor, Water Resources, Southern Field Division, Department of Water Resources.

7           2.     California Highway Patrol: Captain Gretchen Jacobs, Commander, Antelope Valley  
8     California Highway Patrol, Bishop.

9           3.     California State Lands Commission: Brian Bugsch, Chief, Land Management  
10    Division.

11          4.     California Department of the Military: Lorren T. Deakin, MAJ, En. Construction and  
12    Facilities Management Officer.

13          5.     California Department of Corrections and Rehabilitation: Mack Mimaki, Chief  
14    Engineer, California Department of Corrections and Rehabilitation.

15          6.     California Department of Veterans Affairs: David R. Gerard, Assistant Deputy  
16    Secretary, Capital Assets, California Department of Veterans Affairs.

17          7.     California 50th District Agricultural Association: Daniel P. Jacobs, Chief Executive  
18    Officer, Fiftieth (50th) District Agricultural Association.

19          8.     California Department of Parks and Recreation: Warren Arthur Dingman, Park and  
20    Recreation Specialist, CA State Parks-Tehachapi District, Lancaster, CA.

21          9.     California Department of Transportation: Brent Green, Director, District 9; Craig A.  
22    Holste, Deputy District Director, Maintenance and Traffic Operations, District 9; Dana Hendrix,  
23    Lancaster Maintenance Station, District 7; Paul Caron, District 7 Environmental; Nancy Escallier,  
24    District 9 Right of Way Office Chief; John Fox, District Maintenance Engineer District 9.

1 Dated: April 27, 2015

Respectfully Submitted,

2 KAMALA D. HARRIS  
3 Attorney General of California  
4 ERIC M. KATZ  
5 Supervising Deputy Attorney General  
6 MARILYN H. LEVIN  
7 NOAH GOLDEN-KRASNER  
8 Deputy Attorneys General



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9 Deputy Attorney General  
10 *Attorneys for State of California and State  
11 of California 50th District Agricultural  
12 Association*

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## CERTIFICATE OF SERVICE

Case Name: **Antelope Valley Groundwater** No. **JCCP 4408**  
**Cases**

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I hereby certify that on April 27, 2015, I electronically filed the following document(s) with the Clerk of the Court by using the CM/ECF system:

### **STATE OF CALIFORNIA AND 50<sup>TH</sup> DISTRICT AGRICULTURAL ASSOCIATION'S DESIGNATION OF NON-EXPERT AND EXPERT WITNESSES**

on the interested parties in this action, by posting the document(s) listed above to the Santa Clara County Superior Court e-filing website (<http://www.scefiling.org>) under the Antelope Valley Groundwater matter pursuant to the Court's Order dated October 27, 2005.

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 April 27, 2015, at Los Angeles, California.

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*Gwen Blanchard*  
Declarant

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Signature