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10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
11 **COUNTY OF LOS ANGELES**

12 **ANTELOPE VALLEY**  
13 **GROUNDWATER CASES**

14 Included Actions:

15 Los Angeles County Waterworks District No.  
40 v. Diamond Farming Co., Superior Court of  
California, County of Los Angeles, Case No.  
BC 325201;

16 Los Angeles County Waterworks District No.  
17 40 v. Diamond Farming Co., Superior Court of  
California, County of Kern, Case No. S-1500-  
18 CV-254-348;

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

Judicial Council Coordination No. 4408

13 **CLASS ACTION**

Santa Clara Case No. A-05-CV-049053  
Assigned to The Honorable Jack Komar,  
Department I

16 **H&N DEVELOPMENT CO. WEST,**  
17 **INC.'S WITNESS AND EXHIBIT LIST**  
18 **FOR THE PROVE-UP OF THE**  
**[PROPOSED] STIPULATED JUDGMENT**  
**AND PHYSICAL SOLUTION AT TRIAL**

Date: August 3, 2015  
Time: TBD  
Dept.: TBD

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H&N DEVELOPMENT CO. WEST, INC.'S WITNESS  
AND EXHIBIT LIST FOR THE PROVE-UP OF THE  
[PROPOSED] STIPULATED JUDGMENT AND  
PHYSICAL SOLUTION

1 **TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:**

2 PLEASE TAKE NOTICE that in accordance with the Court's Second Case Management  
3 Order dated March 27, 2015, H&N DEVELOPMENT CO. WEST, INC. ("H&N") hereby  
4 discloses the following witnesses and exhibits regarding the prove-up of the [Proposed]  
5 Stipulated Judgment and Physical Solution at trial as follows:

6 Witnesses:

- 7 1. Rod Stiefvater (lessee of H&N's property located within the adjudication area;  
8 regarding reasonable and beneficial use of groundwater by H&N).
- 9 2. Norik Naraghi (president of H&N; regarding reasonable and beneficial use of  
10 groundwater by H&N).
- 11 3. Dennis Williams (non-retained expert; regarding the adoption of the [Proposed]  
12 Judgment & Physical Solution).
- 13 4. Robert G. Beeby (non-retained expert; regarding the reasonable and beneficial use  
14 of water by H&N and the other Stipulating Parties).
- 15 5. David Peterson (non-retained expert; regarding the reasonable and beneficial use  
16 of water by H&N and the other Stipulating Parties).
- 17 6. Robert Wagner (non-retained expert; regarding the adoption of the [Proposed]  
18 Judgment & Physical Solution).

19 The above list does not include any witnesses to be called for rebuttal and impeachment,  
20 if any. In addition to the witnesses listed above, H&N reserves the right to supplement or add to  
21 this list of witnesses if necessary.

22 Exhibits:

- 23 1. H&N's Responses to December 12, 2012 Discovery Order, including all exhibits  
24 attached thereto.
- 25 2. H&N'S Designation of Expert and Non-Expert Trial Witnesses for Phase 4 Trial.
- 26 3. Declaration of Norik Naraghi in Lieu of Deposition Testimony for Phase 4 Trial,  
27 including all exhibits attached thereto.

4. Declaration of Rod Stiefvater in Lieu of Deposition Testimony for Phase 4 Trial,  
including all exhibits attached thereto.

5. Stipulation Regarding Pumping During Calendar Years 2011 and 2012.

In addition to the exhibits listed above, H&N reserves the right to supplement or add to this list of exhibits if necessary.

Dated: April 27, 2015

KLEIN, DeNATALE, GOLDNER  
COOPER, ROSENLIB & KIMBALL, LLP

By:

JOSEPH D. HUGHES  
Attorneys for H&N DEVELOPMENT CO.  
WEST, INC.

Case No. JCCP4408

**PROOF OF SERVICE**

STATE OF CALIFORNIA, COUNTY OF KERN

I am employed in the County of Kern, State of California. I am over the age of eighteen years and not a party to the within action; my business address is 4550 California Ave., Second Floor, Bakersfield, CA 93309. My email address is tgarcia@kleinlaw.com.

On April 27, 2015, I served the following document described as


**H&N DEVELOPMENT CO. WEST, INC.'S WITNESS AND EXHIBIT LIST FOR THE PROVE-UP OF THE [PROPOSED] STIPULATED JUDGMENT AND PHYSICAL SOLUTION AT TRIAL**

on the interested parties in this action as follows:

**BY ELECTRONIC MAIL** Pursuant to California Rules of Court, rule 2.251, I posted the document listed above to the Santa Clara Court website regarding the Antelope Valley Groundwater matter.

Executed on April 27, 2015, at Bakersfield, California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

  
Tabitha Garcia