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ANTELOPE VALLEY WATER STORAGE, LLC

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES – CENTRAL DISTRICT

Coordination Proceeding
Special Title (Rule 1550(b))

Judicial Council Coordination Proceeding
No. 4408

**ANTELOPE VALLEY GROUNDWATER
CASES**

Santa Clara Case No: 1-05-CV-049053
Assigned to Honorable Jack Komar

Included actions:

Los Angeles County Waterworks District No.
40 v. Diamond Farming Company, a
corporation, Superior Court of California,
County of Los Angeles, Case No. BC325201;

Los Angeles County Waterworks District No.
40 v. Diamond Farming Company, a
corporation, Superior Court of California,
County of Kern, Case No. S-1500-CV-254-
348;

Wm. Bolthouse Farms, Inc. v. City of
Lancaster, Diamond Farming Company, a
corporation, v. City of Lancaster, Diamond
Farming Company, a corporation vs. Palmdale
Water District, Superior Court of California,
County of Riverside, Case Nos. RIC 353840,
RIC 344436, RIC 344668.

**ANTELOPE VALLEY WATER STORAGE,
LLC'S DISCLOSURE OF WITNESSES AND
EXHIBITS FOR THE PROVE-UP OF THE
STIPULATED JUDGMENT AND
PHYSICAL SOLUTION TRIAL**

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

TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that in accordance with Court's Second Case Management
Order dated March 27, 2015, Antelope Valley Water Storage, LLC ("AVWS") hereby discloses
the following witnesses and exhibits regarding the prove-up of the [Proposed] Stipulated

Judgment and Physical Solution Trial as follows:

WITNESSES

1. Mark Beuhler, General Manager, Antelope Valley Water Storage, LLC

Mark Beuhler will testify as a percipient witness, and as a non-retained expert witness, regarding his background and experience, his analysis and opinions regarding water use and amounts on AVWS' property, and the basis for his analysis and opinions.

2. Dave Dorrance, WDS California II, LLC

Dave Dorrance will testify regarding the report he prepared in November 2004 that lists the acreage and crops grown on AVWS' property during 2000-20004. Mr. Dorrance will explain the sources of the information in this report, the purpose of the report, and how the report was prepared.

3. Ari Swiller, WDS California II, LLC

Ari Swiller will testify regarding the leases he signed on behalf of AVWS. Mr. Swiller will explain the leases with Kern Ridge Growers and Maritorenna Farms, and describe the relationship between WDS California II, LLC and AVWS.

4. Carl Voss, Grimmway Enterprises, Inc.

Carl Voss will testify regarding the farming he performed on AVWS' property during 2000-2004. Mr. Voss will explain the crop maps showing the acreage and crops grown, and verify the information in Dave Dorrance's report.

5. Vaughn Easter, Kern Ridge Growers

Vaughn Easter will testify regarding the farming Kern Ridge Growers performed on AVWS' property from 2011-present. Mr. Easter will verify the acreage and crops grown on AVWS' property.

6. Marie Maritorenna, Maritorenna Farms

Marie Maritorenna will testify regarding the farming Maritorenna Farms performed on AVWS' property during 2012. Ms. Maritorenna will verify the acreage and crops grown on AVWS' property.

7. Robert Beeby, Public Water Suppliers' Crop Duty Expert - (Non-Retained Expert)

Robert Beeby will verify the crop duties Mark Beuhler used to calculate water use on AVWS' property, and to the reasonable and beneficial use of water by Stipulating Parties.

8. Custodian of Records for Antelope Valley East-Kern Water Agency

The custodian of records will explain the records showing the State Water Project water delivered to AVWS' property during 2000-2004 and 2011-2012.

9. Dennis Williams - (Non-Retained Expert)

Recommendation of the [Proposed] Judgment & Physical Solution

10. David Peterson, CEG, CHG - (Non-Retained Expert)
Reasonable and beneficial use of water by Stipulating Parties
11. Robert Wagner - (Non-Retained Expert)
Recommendation of the [Proposed] Judgment & Physical Solution
12. Charles W. Binder - (Non-Retained Expert)
Recommendation of the [Proposed] Judgment & Physical Solution
- The above list does not include any witnesses to be called for rebuttal and impeachment, if any. In addition to the witnesses listed above, AVWS reserves the right to supplement or add to this list of witnesses if necessary.

EXHIBITS

EXHIBIT NO.	DESCRIPTION
4-AVWaterStorage-1	Mark Beuhler Resume (Exhibit 2 to Mark Beuhler Deposition Transcript)
4-AVWaterStorage-2	Grant deeds for the seventeen parcels AVWS obtained from the Van Dams in 2007 and 2008 (Exhibit K to Supplemental Declaration of Mark Beuhler dated April 11, 2013).
4-AVWaterStorage-3	Summary of AVWS' parcel numbers, size, and date of acquisition (Exhibit B to Declaration of Mark Beuhler dated January 31, 2013).
4-AVWaterStorage-4	Lease agreements between AVWS and Kern Ridge Growers for 2011 and 2012 (Exhibit C to Declaration of Mark Beuhler dated January 31, 2013).
4-AVWaterStorage-5	Lease agreement between AVWS and Maritorena Farms for 2012 (Exhibit D to Declaration of Mark Beuhler dated January 31, 2013).
4-AVWaterStorage-6	Rural Property Income and Production Questionnaires filed with the Kern County Assessor during 2011 and 2012 (documents Bates labeled AVWS 000205-AVWS 000218 and AVWS 000221-AVWS 000234).
4-AVWaterStorage-7	Water delivery records and invoices for State Water Project Water delivered to AVWS' property for 2000-2004 and 2011-2012 (Exhibit F to Declaration of Mark Beuhler dated January 31, 2013).
4-AVWaterStorage-8	Summary of AVEK water purchases and use of water at AVWS' property during 2000-2004 and 2011-2012 (Exhibit G to Declaration of Mark Beuhler dated January 31, 2013).
4-AVWaterStorage-9	Table of Applied Crop Water Duties identified by Public Water Suppliers' expert Robert Beeby (Exhibit H to Declaration of Mark Beuhler dated January 31, 2013).

- 1 4-AVWaterStorage-10 Summary of Estimated Water Used for Irrigation at AVWS' property
2 during 2011-2012 (Distillation of Information in Exhibit J to
3 Declaration of Mark Beuhler dated January 31, 2013 as amended by
4 Supplemental Declaration dated April 11, 2013).
- 5 4-AVWaterStorage-11 Declaration of Mark Beuhler on Behalf of Antelope Valley Water
6 Storage, LLC in Lieu of Deposition Testimony for Phase 4 Trial
- 7 4-AVWaterStorage-12 Notice of Errata and Supplemental Declaration of Mark Beuhler on
8 Behalf of Antelope Valley Water Storage, LLC in Lieu of Deposition
9 Testimony for Phase 4 Trial
- 10 4-AVWaterStorage-13 Stipulation of Facts Related to Antelope Valley Water Storage, LLC
- 11 4-AVWaterStorage-14 Crop maps showing the location and acreage of the crops grown on
12 AVWS' property during 2000-2004, prepared by Carl Voss of
13 Grimmway Enterprises, Inc. (documents Bates labeled
14 AVWS000001-AVWS000005).
- 15 4-AVWaterStorage-15 Report showing the acreage and crops grown on AVWS' property
16 during 2000-2004, prepared by David Dorrance of WDS California
17 II, LLC (Exhibit I to Declaration of Mark Beuhler dated January 31,
18 2013).

19 In addition to the exhibits listed above, AVWS reserves the right to supplement or add to
20 this list of exhibits if necessary.

21 Dated: April 27, 2015

HERUM \ CRABTREE \ SUNTAG
California Professional Corporation

22 By: \s\Jeanne M. Zolezzi
23 JEANNE M. ZOLEZZI
24 Attorneys for Cross-Defendant
25 ANTELOPE VALLEY WATER STORAGE, LLC
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PROOF OF SERVICE

I, Carol Bracken, certify and declare:

I am over the age of 18 years and not a party to this action. My business address is: HERUM \ CRABTREE \ SUNTAG, 5757 Pacific Avenue, Suite 222, Stockton, California 95207. On the date set forth below, I served the following document(s):

ANTELOPE VALLEY WATER STORAGE, LLC'S DISCLOSURE OF WITNESSES AND EXHIBITS FOR THE PROVE-UP OF THE STIPULATED JUDGMENT AND PHYSICAL SOLUTION TRIAL

[X] BY ELECTRONIC SERVICE AS FOLLOWS I posted the document listed above to the Santa Clara Superior Court website regarding the Antelope Valley Groundwater matter (Judicial Council Coordination Proceeding No. 4408, Santa Clara Case No. 1-05-CV-049053) pursuant to the Court’s Clarification Order.

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

Dated: April 27, 2015

/s/ Carol Bracken
CAROL BRACKEN