

1 **LEWIS BRISBOIS BISGAARD & SMITH LLP**
MALISSA HATHAWAY McKEITH, SB# 112917
2 E-Mail: mckeith@lbbslaw.com
JOSEPH SALAZAR, JR., SB# 169551
3 E-Mail : salazar@lbbslaw.com
JACQUELINE MITTELSTADT, SB#172188
4 E-Mail: mittelstadt@lbbslaw.com
KIMBERLY A. HUANGFU, SB# 252241
5 E-mail: huangfu@lbbslaw.com
221 North Figueroa Street, Suite 1200
6 Los Angeles, California 90012
Telephone: 213.250.1800
7 Facsimile: 213.250.7900

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

9 **COUNTY OF SANTA CLARA**

10 **ANTELOPE VALLEY GROUNDWATER**
11 **CASES:**

12 Included Actions:

13 Los Angeles County Waterworks District No.
40 v. Diamond Farming Co.
Superior Court of California
14 County of Los Angeles, Case No. BC325201

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

18 Wm. Bolthouse Farms, Inc. v. City of
Lancaster
19 Diamond Farming Co. v. City of Lancaster
Diamond Farming Co. v. Palmdale Water Dist.
20 Superior Court of California
County of Riverside, consolidated actions
21 Case Nos. RIC 353840, RIC 344436,
RIC 344668

Judicial Council Coordination
Proceeding No. 4408

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

**ANAVERDE LLC'S WITNESS LIST FOR
PHASE 2 TRIAL**

Trial Date: October 6, 2008

Location: Dept. 1

Time: 9:00 a.m.

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

2 Cross-defendant, Anaverde LLC ("Anaverde") hereby identifies the following individuals
3 as witnesses who may testify in Anaverde's case-in-chief:

4 1. **Brian Veit: Manager of Anaverde Land Management, LLC and the**
5 **Administrative Member of Anaverde LLC.** Mr. Veit has personal knowledge of the history and
6 practices of Anaverde and the overall project. He is expected to testify at trial as to ownership of
7 Anaverde and its future development plans. His direct examination is expected to last
8 approximately three (3) hours.

10 2. **John Lambie: Principal Groundwater Hydrologist, e-pur, LLC.** Mr. Lambie
11 is Anaverde's designated expert witness. Mr. Lambie is an expert witness on groundwater
12 characteristics of the aquifer below and around Anaverde's property. Anaverde intends to call Mr.
13 Lambie to testify to the issue of separate basins that are distinct from the overall Antelope Valley
14 Adjudication Basin. Anaverde estimates approximately eight (8) hours for Mr. Lambie's
15 testimony.

17 3. **Brian Gulbranson: Senior Scientist/Geologist, Summit Environsolutions, Inc.**
18 Mr. Gulbranson is qualified to conduct geophysical investigations and aquifer testing. He has
19 personal knowledge of the aquifer testing conducted on Anaverde's property. Anaverde estimates
20 approximately three (3) hours for Mr. Gulbranson's testimony.

22 4. **Carl Hauge**, or other person whom the Department of Water Resources ("DWR")
23 designates as the person most knowledgeable about Bulletin 118-2003, entitled "California's
24 Groundwater Bulletin 118 Update 2003", October 2003.

25 5. **Person Most Knowledgeable** (as determined through the ongoing meet and confer
26 process between Anaverde and the District) regarding the Los Angeles County Waterworks
27 District No. 40's excel spreadsheet and its creation, maintenance, underlying data, and
28

1 compilation/authentication.

2 Anaverde reserves its right to call other persons to testify (expert and/or percipient) as may
3 be required, and as may be required to impeach and/or rebut any testimony or evidence offered by
4 any party. Further foundation and/or authentication witnesses may be called, if needed.
5

6
7 DATED: September 29, 2008

Respectfully submitted,

8 MALISSA HATHAWAY McKEITH
9 JOSEPH SALAZAR, JR.
JACQUELINE MITTELSTADT
10 KIMBERLY A. HUANGFU
LEWIS BRISBOIS BISGAARD & SMITH LLP

11 By: Kimberly A. Huangfu
12 KIMBERLY A. HUANGFU
13 Attorneys for ANAVERDE, LLC.
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28


PROOF OF SERVICE

I declare that:

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen years and not a party to the within action. My business address is 221 North Figueroa Street, Suite 1200, Los Angeles, California 90012.

On September 29, 2008, I served **ANAVERDE LLC'S WITNESS LIST** by posting the document(s) listed above to the Santa Clara Superior Court website in regard to the Antelope Valley Groundwater matter.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct, executed on September 29, 2008.


Maritza Estrada