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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
10 **COUNTY OF SANTA CLARA**

11 **ANTELOPE VALLEY GROUNDWATER**  
12 **CASES:**

13 Included Actions:

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

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

19 Wm. Bolthouse Farms, Inc. v. City of  
Lancaster  
20 Diamond Farming Co. v. City of Lancaster  
Diamond Farming Co. v. Palmdale Water Dist.  
21 Superior Court of California  
County of Riverside, consolidated actions  
22 Case Nos. RIC 353840, RIC 344436,  
RIC 344668  
23

Judicial Council Coordination  
Proceeding No. 4408

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

**ANAVERDE LLC'S NOTICE OF  
EXPERT WITNESS DEPOSITION OF  
DR. JUNE OBERDORFER AND  
REQUEST FOR PRODUCTION OF  
DOCUMENTS**

**Date:** October 31, 2008

**Time:** 9:30 a.m.

**Location:** United States Attorney General's  
Office  
150 Almaden Blvd., Suite 900  
San Jose, California 95113

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28 NOTICE IS HEREBY GIVEN as follows:

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**I. NOTICE OF DEPOSITION**

Anaverde LLC ("Anaverde") (the "NOTICING PARTY") will take the deposition of the following expert witness (the "DEPONENT"), Dr. June Oberdofer, expert witness for the United States, at the United States Attorney General's office, 150 Almaden Boulevard, Suite 900, San Jose, California 95113, on October 31, 2008 at 9:30 a.m. A conference-call in number and passcode will be provided as soon as it becomes available. Said deposition will continue from day-to-day thereafter, weekends and holidays.

**II. REQUEST FOR PRODUCTION**

**A. DEFINITIONS**

The following words and phrases shall govern the construction of this document unless the context otherwise requires:

- 1. "NOTICING PARTY" or "Anaverde" means Anaverde LLC.
- 2. "DEPONENT" or "YOU" or "YOUR" means the deponent as set forth in the notice.
- 3. "DOCUMENT" means "writing" as defined by Evidence Code section 250 and includes drafts, originals and duplicates of written, graphic, computer or otherwise recorded matters, whether stored in written, electronic, magnetic or photographic format or by any other means.

**B. DOCUMENTS AND THINGS TO BE PRODUCED**

The DEPONENT is required to produce, at the date, time and location so noticed, all DOCUMENTS described below. This demand relates not only to all DOCUMENTS under the DEPONENT's possession, custody or control, but also those DOCUMENTS reasonably available to the DEPONENT.

- 1. All DOCUMENTS received, reviewed or relied upon by the DEPONENT in preparing to provide rebuttal expert testimony in this Phase 2 proceeding.
- 2. All preliminary, draft and final DOCUMENTS prepared by or on behalf of the DEPONENT which in any way pertain to the DEPONENT's review, analysis, opinions, conclusions, or beliefs regarding the subject matter of the Phase 2 trial.



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**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 October 24, 2008, 2008, I served **ANAVERDE LLC'S NOTICE OF EXPERT WITNESS DEPOSITION OF DR. JUNE OBERDORFER AND REQUEST FOR PRODUCTION OF DOCUMENTS** by posting the document(s) 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 October 24, 2008, 2008.

/s/ \_\_\_\_\_  
Maritza Estrada