

**MICHAEL T. FIFE (State Bar No. 203025)**  
**BRADLEY J. HERREMA (State Bar No. 228976)**  
**BROWNSTEIN HYATT FARBER SCHRECK, LLP**  
**21 East Carrillo Street**  
**Santa Barbara, California 93101**  
**Telephone No: (805) 963-7000**  
**Facsimile No: (805) 965-4333**

**Attorneys for:** B.J. Calandri, John Calandri, John Calandri as Trustee of the John and B.J. Calandri 2001 Trust, Forrest G. Godde, Forrest G. Godde as Trustee of the Forrest G. Godde Trust, Lawrence A. Godde, Lawrence A. Godde and Godde Trust, Kootenai Properties, Inc., Gailen Kyle, Gailen Kyle as Trustee of the Kyle Trust, James W. Kyle, James W. Kyle as Trustee of the Kyle Family Trust, Julia Kyle, Wanda E. Kyle, Eugene B. Nebeker, R and M Ranch, Inc., Edgar C. Ritter Paula E. Ritter, Paula E. Ritter as Trustee of the Ritter Family Trust, Trust, Hines Family Trust, Malloy Family Partners, Consolidated Rock Products, Calmat Land Company, Marygrace H. Santoro as Trustee for the Marygrace H. Santoro Rev Trust, Marygrace H. Santoro, Helen Stathatos, Savas Stathatos, Savas Stathatos as Trustee for the Stathatos Family Trust, Dennis L. & Marjorie E. Groven Trust, Scott S. & Kay B. Harter, Habod Javadi, Juniper Hills Water Group, Eugene V., Beverly A., & Paul S. Kindig, Paul S. & Sharon R. Kindig, Jose Maritorena Living Trust, Richard H. Miner, Jeffrey L. & Nancee J. Siebert, Barry S. Munz, Terry A. Munz and Kathleen M. Munz, Beverly Tobias, Leo L. Simi, White Fence Farms Mutual Water Co. No. 3., William R. Barnes & Eldora M. Barnes Family Trust of 1989, Healy Enterprises, Inc., John and Adrienne Reca, Sahara Nursery, Sal and Connie L. Cardile, Gene T. Bahlman, **collectively known as the Antelope Valley Ground Water Agreement Association ("AGWA")**

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**FOR THE COUNTY OF LOS ANGELES**

**ANTELOPE VALLEY**  
**GROUNDWATER CASES**

Included Actions:

Los Angeles County Waterworks District No. 40 v. Diamond Farming Co. Superior Court of California County of Los Angeles, Case No. BC 325 201 Los Angeles County Waterworks District No. 40 v. Diamond Farming Co. Superior Court of California, County of Kern, Case No. S-1500-CV-254-348Wm. Bolthouse Farms, Inc. v. City of Lancaster Diamond Farming Co. v. City of Lancaster Diamond Farming Co. v. Palmdale Water Dist. Superior Court of California, County of Riverside, consolidated actions, Case No. RIC 353 840, RIC 344 436, RIC 344 668

) Judicial Council Coordination Proceeding  
) No. 4408  
)

) **Santa Clara Case No. 1-05-CV-049053**  
) Assigned to The Honorable Jack Komar  
)

) **ANTELOPE VALLEY GROUNDWATER**  
) **AGREEMENT ASSOCIATION'S NOTICE**  
) **OF DEPOSITIONS OF EXPERTS**

) **Phase 3 Trial Date: September 27, 2010**  
)  
)

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

**PLEASE TAKE NOTICE** that pursuant to Code of Civil Procedure section 2034.410, on the dates, times and locations listed below, the depositions of the individuals listed below will be taken before a Certified Shorthand Reporter and, if for any reason the taking of said depositions are not completed on said days, the taking of the depositions will be continued from day to day, Sundays and holidays excepted, until completed. All depositions will take place at Brownstein Hyatt Farber Schreck, LLP, 2029 Century Park East, Suite 2100, Los Angeles, CA 90067-3007.

The persons whose deposition will be taken and the dates and times are as follows:

Joseph Scalmanini	August 2, 3, and 4, 2010 9:00 a.m.
Mark Wildermuth	August 6, 9, and 10, 2010 9:00 a.m.
Robert Beeby	August 11, 12, and 16, 2010 9:00 a.m.
Peter Leffler	August 17, 18, and 20, 2010 9:00 a.m.
Timothy Durbin	August 23, 24, and 25, 2010 9:00 a.m.
June Oberdorfer	August 26, 27, and 30, 2010 9:00 a.m.
Thomas Harder	August 31, September 1, 2, 2010 9:00 a.m.

**PLEASE TAKE FURTHER NOTICE** that the deponents set forth herein are requested to produce at the time of the deposition the following:

1. Deponent's entire file concerning the above-captioned lawsuit.
2. Any and all writings prepared by or on behalf deponent or anyone working at the direction of said deponent which in any way pertains to the review, analysis, opinions, conclusions, or beliefs of said deponent with regard to the subject matter of this litigation.
3. Any and all writings received and/or reviewed by said deponent pertaining to the subject matter of this litigation.

1           4.       Any and all handwritten notes, field notes, calculations or other writings prepared by  
2 or on behalf of said deponent or by someone at the direction of said deponent pertaining to the  
3 subject matter of this litigation.

4           5.       Any and all photographs, videotapes, micrographs, or other such recording received,  
5 analyzed, prepared by, considered, relied upon by said deponent which pertains to the subject matter  
6 of this litigation.

7           6.       Any and all books, articles, treatises, reports, or other writings which in any way form  
8 the basis for any opinion, conclusion or analysis of said deponent relating to the subject matter of  
9 this litigation.

10          7.       Any and all writings pertaining to the billing and amount of time spent by said  
11 deponent or others under the direction of said deponent in working on any matter pertaining to the  
12 subject of this litigation. This includes but is not limited to any and all timesheets or billing  
13 statements.

14          8.       Any and all reports, conclusions, opinions, and drafts of the same prepared by  
15 deponent in connection with the above-captioned lawsuit.

16          9.       Any “engagement letter” or similar instructions received by deponent in connection  
17 with the above-captioned matter.

18          10.      Your current Curricula Vitae.

19          11.      All documents, depositions, scientific, technical or professional texts, journals, or any  
20 other “writings” (as defined by California Evidence Code, section 250) including any documents  
21 prepared by any present or former party to this action which the deponent read, referred to,  
22 considered or relied upon in preparing to testify in deposition or at trial, of this action.

23          12.      All documents, depositions, scientific, technical or professional texts, journals, or any  
24 other action in which you provided testimony, either by deposition or in trial, as a percipient and/or  
25 expert witness, which you have read, referred to, considered or relied upon in preparing to testify or  
26 in testifying, in deposition or at trial, in this action.



- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

I am employed in the County of Santa Barbara, State of California. I am over the age of 18 and not a party to the within action; my business address is: 21 E. Carrillo Street, Santa Barbara, California 93101.

**ANTELOPE VALLEY GROUNDWATER AGREEMENT ASSOCIATION'S NOTICE OF  
DEPOSITIONS OF EXPERTS**

By posting it on the website at 4:30 p.m. on July 16, 2010. This posting was reported as complete and without error.

Executed in Santa Barbara, California, on July 16, 2010.



## SIGNATURE