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Attorneys for The Frank and Yvonne Lane Family Trust, Dated March 5, 1993 as Restated July

11 20, 2000

Little Rock Sand and Gravel, Inc.

12 Littlerock Aggregate Co., Inc. dba Antelope Valley Aggregate, Inc.

A.C. Warnack, as Trustee of The A.c. Wamack Trust

13 A. V. Materials, Inc.

The George and Charlene Lane Family Trust

14 Holliday Rock Co., Inc.

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1 The parties listed above (the “NOTICING PARTIES”) hereby give notice as follows:

2 **I. NOTICE OF DEPOSITION**

3 The NOTICING PARTIES will take the deposition of the following expert witness (the
4 “DEPONENT”) of the COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY
5 NOS. 14 AND 20 at VERITEXT, 707 WILSHIRE BOULEVARD, SUITE 3500 LOS
6 ANGELES, CA 90017, at the following date and time and will continue from day-to-day
7 thereafter, weekends and holidays excepted:
8

9 <u>Deponent</u>	10 <u>Date</u>	11 <u>Time</u>
12 Ray Tremblay, P.E.	13 March 4, 2013	14 10:00 a.m.

15 **II. REQUEST FOR PRODUCTION**

16 **A. DEFINITIONS**

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

19 1. “DEPONENT” or “YOU” or “YOUR” means the deponent as set forth in the
20 notice.

21 2. “DOCUMENT” means “writing” as defined by Evidence Code section 250 and
22 includes drafts, originals and duplicates of written, graphic, computer or otherwise recorded
23 matters, whether stored in written, electronic, magnetic or photographic format or by any other
24 means.

25 3. “SANITATION DISTRICTS” means COUNTY SANITATION DISTRICTS OF
26 LOS ANGELES COUNTY NOS. 14 AND 20.

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

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

5
6 1. All DOCUMENTS received, reviewed or relied upon by the DEPONENT in
7 preparing to provide expert testimony in this proceeding.

8 2. All DOCUMENTS supporting SANITATION DISTRICTS' claimed beneficial
9 use of groundwater since year 2000.

10 3. All DOCUMENTS evidencing SANITATION DISTRICTS' future demand for
11 groundwater.

12 4. All Notice of Groundwater Extraction reports filed by SANITATION
13 DISTRICTS with the State Water Resources Control Board since year 2000.

14 5. All preliminary, draft and final DOCUMENTS prepared by or on behalf of the
15 DEPONENT which in any way pertain to the DEPONENT's review, analysis, opinions,
16 conclusions, or beliefs regarding the subject matter of the Phase 4 trial.

17 6. All DOCUMENTS that summarize the DEPONENT's education, training and
18 experience, including all versions of DEPONENT's resume or curriculum vitae.

19 7. All DOCUMENTS that the DEPONENT intends to use at the time of trial as
20 illustrative or demonstrative evidence.

21 8. All photographs, video tapes, or other recordings which pertain to the
22 DEPONENT's opinion in the Phase 4 trial.

23 9. All books, articles, treatises, reports, journals or other DOCUMENTS, which the
24 DEPONENT reviewed, considered or relied upon as the basis for any opinion, conclusion, or
25 analysis of the DEPONENT.
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10. All DOCUMENTS that set forth the terms and conditions of the DEPONENT's employment in this matter.

11. All of the DEPONENT's time records and billing statements for work performed relating to the subject matter of this litigation.

12. The DEPONENT's entire file concerning this proceeding.

13. All electronic files and software reviewed, considered or relied upon by the DEPONENT in reaching any opinion.


14. All DOCUMENTS evidencing any communication with any attorney for the County Sanitation District of Los Angeles County Nos. 14 and 20 regarding the subject matter of this proceeding.

15. All DOCUMENTS evidencing any communication with any evidence for the County Sanitation District of Los Angeles County Nos. 14 and 20 regarding the subject matter of this proceeding.

16. All DOCUMENTS evidencing or relating to the production of water by the County Sanitation District of Los Angeles County Nos. 14 and 20 within the Antelope Valley Area of Adjudication from 2000-2012.

Dated: February 26, 2013

BROWNSTEIN HYATT FARBER SCHRECK, LLP

By: 
MICHAEL T. FIFE
BRADLEY J. HERREMA
ATTORNEYS FOR AGWA

PROOF OF SERVICE

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**STATE OF CALIFORNIA,
COUNTY OF SANTA BARBARA**

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.

On February 26, 2013, I served the foregoing document described as:

**NOTICE OF DEPOSITION AND REQUEST FOR PRODUCTION OF DOCUMENTS OF
COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY NOS. 14 AND 20
WITNESS RAY TREMBLAY, P.E.**

on the interested parties in this action.

By posting it on the website by 5:00 p.m. on February 26, 2013.

This posting was reported as complete and without error.

(STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed in Santa Barbara, California, on February 26, 2013.

**LINDA MINKY
TYPE OR PRINT NAME**


SIGNATURE