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Attorneys for: Gene T. Bahlman, William Barnes, William R. Barnes & Eldora M. Barnes Family Trust of 1989, Thomas M. Bookman, B.J. Calandri, John Calandri, John Calandri as Trustee of the John and B.J. Calandri 2001 Trust, Son Rise Farms, Calmat Land Company, Sal and Connie L. Cardile, Efren and Luz Chavez, Consolidated Rock Products, Del Sur Ranch LLC, Steven Godde as Trustee of the Forrest G. Godde Trust, Lawrence A. Godde, Lawrence A. Godde and Godde Trust, Robert and Phillip Gorrindo, Gorrindo Family Trust, Laura Griffin, Healy Farms, Healy Enterprises, Inc., John Javadi and Sahara Nursery, Juniper Hills Water Group, 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, Maritorea Living Trust, Jose and Marie Maritorea, Richard H. Miner, Barry S. Munz, Terry A. Munz and Kathleen M. Munz, Eugene B. Nebeker, R and M Ranch, Inc., Richard and Michael Nelson, Robert Jones, John and Adrienne Reca, Mabel Selak, Jeffrey L. & Nancee J. Siebert, Dr. Samuel Kremen and Tierra Bonita Ranch Company, Beverly Tobias, Triple M Property FKA and 3M Property Investment Co., Vulcan Materials Co. and Vulcan Lands Inc., Willow Springs Company, Donna Wilson, **collectively known as the Antelope Valley Groundwater Agreement Association ("AGWA")**

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

ANTELOPE VALLEY GROUNDWATER CASES

Judicial Council Coordination Proceeding
No. 4408

Included Actions:

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

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-254-348 Wm. 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

AMENDED NOTICE OF DEPOSITION OF STEVE C. CORTNER

Date: April 23, 2013
Time: 9:00 a.m.

1 TO ALL INTERESTED PARTIES AND THEIR ATTORNEY OF RECORD:

2 PLEASE TAKE NOTICE THAT THE DEPOSITION OF Steve C. Cortner will be taken
3 on April 23, 2013, commencing at 9:00 AM at the offices of Veritext, 707 Wilshire Boulevard,
4 Suite 3500, Los Angeles, California, 90017, upon oral examination before a Certified Shorthand
5 Reporter. This noticing party also intends to record the testimony by audio technology, video
6 technology, and the testimony by stenographic method through the instant visual display of the
7 testimony.

8 Said deposition will continue from day to day, excluding Sundays and holidays, until
9 complete.

10 Please note: If an interpreter is needed and/or desired by the deponent, it is requested that
11 the undersigned be notified no later than five (5) days before the date of the deposition.

12 YOU ARE FURTHER NOTIFIED THAT:

13 This noticing party intends to reserve the right to use at trial a videotape deposition of this
14 expert. (Code of Civil Procedure § 2025.220(a)(6).)

15 YOU ARE FURTHER NOTIFIED THAT:

16 The deponent is required to produce the following documents, records, or other materials
17 at the deposition:

18 **DEFINITIONS**

19 “BASIN” BASIN shall be defined as on and below the ground surface within the
20 jurisdictional area defined by the court in this matter by order dated March 16, 2007.

21 “DOCUMENT” shall be defined as and have the same broad meaning as it has in
22 California Evidence Code § 250 and Code of Civil Procedure §2031.010 et seq. and includes
23 documents, papers, books, accounts, letters, records, photographs, objects, and all other tangible
24 things. It includes all forms of written communication. It specifically includes all originals,
25 copies, duplicates, drafts, or other recordings of any written, graphic, or otherwise recorded
26 matter, however produced or reproduced, whether inscribed by hand or by mechanical, electronic,
27 microfilm, photographic, phonic, or any other means. It includes abstracts; address books;
28 advertisements; affidavits or statements; agreements; analyses of any kind; appointment books;

1 architectural blueprints or drawings; balance sheets; bids; billings; blueprints; books or records of
2 account; purchase orders; work papers; brochures; bulletins; calendars; charts; checks and
3 canceled checks; circulars; compilations; computer cards, runs, and printouts; computer
4 programs; computer tapes and discs; consultants' reports or studies; contracts; correspondence;
5 data processing input and output; data sheets; desk calendars; diagrams; diaries; directories; discs;
6 drawings; estimates; expense account records; experts' reports or studies; financial statements or
7 calculations; graphs; house publications; income statements; inspection records, sheets, and
8 reports; interoffice and intra-office communications; invoices; job descriptions or assignments;
9 journals; layouts; ledgers; letters; licenses; lists; magnetic tapes; manuals; maps; memorandums
10 of any kind; microfiche; microfilm; minutes or records of any kind; movies; notations; notes;
11 notebooks; opinions; organizational charts; pamphlets; permits; photographs; pictures; plans;
12 projections; promotional materials; press releases or clippings; publications; punch cards;
13 procedures; questionnaires and answers to them; quotations; records and recordings of any kind;
14 renderings; reports of any kind; rework instructions, orders, and procedures; routing slips;
15 schedules; sound recordings; specifications; statistical analyses; stenographers' notebooks; studies
16 of any kind, analyses, forecasts, and evaluations; subcontracts; summaries; surveys; tables,
17 indices, and lists; tabulations; tallies; tapes; telegrams; cables; telephone messages, telephone
18 logs, and telephone billings and statements; teletype and telex messages; trade letters; transcripts,
19 minutes, reports, and recordings of telephone or other conversations, interviews, conferences,
20 committee meetings, or other meetings; undertakings; video tapes; vouchers; and working
21 drawings, papers, and files.

22 “YOU” or “YOUR” shall mean Steve C. Cortner, and shall also include all representatives
23 and agents of Steve C. Cortner, predecessors or successors in interest, and all other PERSONS
24 acting or purporting to act on behalf of respondent to this notice.

25 REQUESTS FOR PRODUCTION

26 Request for Production Number 1.

27 All DOCUMENTS that refer or relate to any opinions YOU intend to offer at the trial of
28 this matter, including but not limited to all DOCUMENTS or WRITINGS YOU reviewed in

1 connection with forming YOUR opinions, or in any way considered or relied upon in forming any
2 opinions YOU intend to offer at trial.

3 **Request for Production Number 2.**

4 All DOCUMENTS that refer or relate to YOUR opinions regarding the groundwater
5 pumping by any party to this case.

6 **Request for Production Number 3.**

7 All DOCUMENTS that refer or relate to YOUR opinions regarding the reasonable and
8 beneficial use of water by any party to this case.

9 **Request for Production Number 4.**

10 All reports and written analyses YOU prepared in connection with YOUR work as an
11 expert in this matter.

12 **Request for Production Number 5.**

13 All DOCUMENTS that evidence the work YOU have performed in forming YOUR
14 opinions in this case, including but not limited to invoices, time records and billing statements.

15 **Request for Production Number 6.**

16 YOUR current curriculum vitae ("C.V."), and all C.V.s YOU have prepared in the last 5
17 years.

18 **Request for Production Number 7.**

19 All DOCUMENTS that refer or relate to any communications YOU have had with the
20 party that designated YOU and/or their current or former attorneys regarding YOUR work as an
21 expert in this case and/or the opinions YOU have formed.

22 **Request for Production Number 8.**

23 All DOCUMENTS or WRITINGS that refer or relate to any communications YOU have
24 had with any person regarding YOUR work as an expert in this case and/or the opinions YOU
25 have formed.

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Request for Production Number 9.

All deposition, trial, arbitration and/or hearing transcripts in YOUR possession, custody or control, wherein, YOU have previously testified as an expert witness in any legal proceeding or deposition.

Request for Production Number 10.

All DOCUMENTS or WRITINGS that refer or relate to YOUR expected testimony at trial, including, but not limited to, land ownership, agricultural practices, distribution of crops and their water use, irrigation methods, and return flows from agricultural practices or imported water.

Request for Production Number 11.

YOUR agreement with the party that designated YOU and/or any other party or their attorney in this case.

Request for Production Number 12.

All drafts YOU prepared or that were prepared at YOUR direction that relate to YOUR opinions in this case.

Request for Production Number 13.

All communications between YOU and any other party or attorney in this case.

Request for Production Number 14.

All communications between another party or attorney in this case.

Request for Production Number 15.

All DOCUMENTS that relate to any other party or attorney in this case.

Request for Production Number 16.

All DOCUMENTS that relate to this case.

Request for Production Number 17.

All reference materials YOU used to formulate YOUR opinions in this case.

Request for Production Number 18.

All opinions that relate the adjudication proceedings.

Request for Production Number 19.

All reports that relate to the adjudication proceedings.

Request for Production Number 20.

All data that is in YOUR possession that relates to the adjudication proceedings in the same electronic format that YOU customarily keep that data.

Dated: March 28, 2013

BROWNSTEIN HYATT FARBER SCHRECK, LLP



By: _____

MICHAEL T. FIFE
BRADLEY J. HERREMA
ATTORNEYS FOR AGWA

PROOF OF SERVICE

**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 March 28, 2013, I served the foregoing document described as:

AGWA's AMENDED NOTICE OF DEPOSITION OF STEVE C. CORTNER

on the interested parties in this action.

By posting it on the website by 5:00 p.m. on March 28, 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 March 28, 2013.

LINDA MINKY
TYPE OR PRINT NAME


SIGNATURE