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Attorneys for Defendant  
GARY VAN DAM

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES, CENTRAL DISTRICT

Coordination Proceeding  
Special Title (Rule 1550(b))

ANTELOPE VALLEY GROUNDWATER  
CASES

Including Consolidated Actions:

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

Los Angeles County Waterworks District No. 40  
v. Diamond Farming Co.; Superior Court of  
California, County of Kern, Case No. S-1500-  
CV-254348

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 nos. RIC  
353840, RIC 344436, RIC 34468;

AND RELATED ACTIONS.

Judicial Council Coordination Proceeding  
No. 44008

Santa Clara Case No. 1-05-CV-049053

Assigned to the Honorable Jack Komar,  
Judge to the Santa Clara Superior Court  
Department 17C

**DEFENDANT GARY VAN DAM'S  
DEMAND FOR EXCHANGE OF  
EXPERT WITNESS INFORMATION  
(CCP §§ 2034.210-2034.310)**

Evidentiary Hearing: December 4, 2023

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

PARTY MAKING THIS DEMAND: Defendant Gary Van Dam

DATE AND TIME OF EXCHANGE: October 16, 2023 at 10:00 a.m.

PLACE OF EXCHANGE: Electronic service upon all counsel of record

Defendant Gary Van Dam, by and through its undersigned counsel, hereby demands under Part 4, Title 4, Chapter 18 of the Code of Civil Procedure (sections 2034.210-2034.310) that, on or before the above date of exchange and at the above place of exchange, all parties to this action participate in a mutual and simultaneous exchange of information concerning each party's expert trial witness(es), in writing as required by Code of Civil Procedure sections 2034.210-2034.310, to the following extent:

1. A list containing the name and address of each natural person, including any party, whose oral or deposition testimony in the form of an expert opinion the party providing the list expects to offer in evidence at the trial or, in the alternative, a statement that the party does not presently intend to offer the testimony of any expert witness.

2. If any witness on the list to be exchanged is a party, an employee of a party, or has been retained by a party for the purpose of forming and expressing an opinion in anticipation of the litigation or in preparation for trial, an expert witness declaration signed by the party, containing for each such witness:

(a) A brief narrative statement of the qualifications of the expert;

(b) A brief narrative statement of the general substance of the testimony that the expert is expected to give;

(c) A representation that the expert has agreed to testify at the trial;

(d) A representation that the expert will be sufficiently familiar with the pending action to submit to a meaningful oral deposition concerning the specific testimony, including any opinion and its basis, that the expert is expected to give at trial; and

(e) A statement of the expert's hourly and daily fee for providing deposition testimony.

26084076.1

Pursuant to Code of Civil Procedure section 2034.300, failure to comply with the above will constitute a waiver of your right to call unlisted expert witnesses at trial.

Dated: September 25, 2023

BROWNSTEIN HYATT FARBER  
SCHRECK, LLP



ROBERT J. SAPERSTEIN

**PROOF OF SERVICE**  
**[Code Civ. Proc. §§ 1011, 1013, 1013(a)(3) & 2015.5]**

**ANTELOPE VALLEY GROUNDWATER CASES**  
**Case No. 1-05-CV-049053 (For filing purposes only)**  
**JCCP 4408**

(STATE OF CALIFORNIA, COUNTY OF SACRAMENTO)

I am a resident of the United States and employed in Santa Barbara County. I am over the age of eighteen years and not a party to the within entitled action. My business address is 1021 Anacapa Street, Second Floor, Santa Barbara, CA 93101. My electronic service address is [cmalone@bhfs.com](mailto:cmalone@bhfs.com).

On September 25, 2023, I served the following documents on the parties in this action described as follows:

**DEFENDANT GARY VAN DAM'S DEMAND FOR EXCHANGE OF EXPERT WITNESS INFORMATION (CCP §§ 2034.210-2034.310)**

**[X] BY ELECTRONIC SERVICE:** by posting the document(s) listed above to the Antelope Valley Groundwater Cases to all parties listed on the Santa Clara Superior Court Service List as maintained via Glotrans. Electronic service completed through <http://www.avwatermaster.org>.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

Executed on this 25<sup>th</sup> day of September, at Santa Barbara, California.

  
Caitlin K. Malone