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2 W. KEITH LEMIEUX (SBN 161850)
3 LEMIEUX & O'NEILL
4 4165 E. Thousand Oaks Blvd., Suite 350
5 Westlake Village, California 91362
6 Telephone: (805) 495-4770
7 Facsimile: (805) 495-2787

8 Attorneys for Defendants/Cross-Complainants/Cross-defendants
9 LITTLEROCK CREEK IRRIGATION DISTRICT, PALM RANCH IRRIGATION DISTRICT
10 NORTH EDWARDS WATER DISTRICT and DESERT LAKE COMMUNITY SERVICES DISTRICT,
11 LLANO DEL RIO WATER CO., LLANO MUTUAL WATER CO., BIG ROCK MUTUAL WATER
12 CO.

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

14 **IN AND FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

15 Coordinated Proceeding
16 Special Title (Rule 1550(b))

) **Judicial Council Coordination No. 4408**

17 ANTELOPE VALLEY GROUNDWATER
18 CASES

) Santa Clara Case No. 1-05-CV-049053
) Assigned to the Honorable Jack Komar – Dept. 17

19 Included Actions:

) **LITTLEROCK CREEK IRRIGATION**
) **DISTRICT, ET AL'S DESIGNATION OF**
) **EXPERT WITNESSES; DECLARATION OF**
) **W. KEITH LEMIEUX**

20 Los Angeles County Waterworks District No. 40
21 v. Diamond Farming Co. Los Angeles County
22 Superior Court Case No. BC 325201;

23 Los Angeles County Waterworks District No. 40
24 v. Diamond Farming Co., Kern County Superior
25 Court, Case No. S-1500-CV-234348;

) **TRIAL DATE: February 11, 2013**

26 Wm. Bolthouse Farms, Inc. v. City of Lancaster
27 Diamond Farming Co. v. City of Lancaster v.
28 Palmdale Water District, Riverside County
Superior Court, Consolidated Actions, Case Nos.
RIC 353840, RIC 344436, RIC 344668

AND RELATED CROSS-ACTIONS

1 Pursuant to Code of Civil Procedure section 2034.260, Littlerock Creek Irrigation District, Palm
2 Ranch Irrigation District, North Edwards Water District, Desert Lake Community Services District, Llano
3 del Rio Water Co., Llano Mutual Water Co., and Big Rock Mutual Water Co. ("Littlerock Creek
4 Irrigation District, et al."), disclose, as a retained expert witness in regard to the Phase 4 Trial in this
5 matter, the following witnesses:

6 Jeff Helsley and Steve Johnson of Stetson Engineers Inc., 861 Village Oaks Drive, Suite 100,
7 Covina, CA 91724. Phone: 626.967.6202, Fax: 626.331.7065.

8 Designating parties reserve the right to amend or supplement this designation if needed as
9 provided in the Code of Civil Procedure. They reserve the right to use previously submitted expert
10 testimony from trial phases I, II, and III.

11
12 DATED: Jan. 4, 2013

LEMIEUX & ONEILL

13
14 By: 

W. KEITH. LEMIEUX

15 Attorneys for LITTLEROCK CREEK IRR. DIST., PALM
16 RANCH IRR. DIST., NORTH EDWARDS WATER DIST.,
17 DESERT LAKE COMMUNITY SERVICES DIST.,
18 LLANO DEL RIO WATER CO., LLANO MUTUAL
19 WATER CO., BIG ROCK MUTUAL WATER CO.

1 **DECLARATION OF W. KEITH LEMIEUX**

2 **IN SUPPORT OF DESIGNATION OF EXPERT WITNESS**

3 I, W. Keith Lemieux, hereby declare:

4 1. I am an attorney licensed to practice before all of the courts in the State of California. I am
5 a partner in the firm of Lemieux & O'Neill, attorneys of record for LITTLE ROCK CREEK IRRIGATION
6 DISTRICT, PALM RANCH IRRIGATION DISTRICT, Cross-Defendants NORTH EDWARDS
7 WATER DISTRICT, DESERT LAKE COMMUNITY SERVICES DISTRICT, LLANO DEL RIO
8 WATER CO., LLANO MUTUAL WATER CO., BIG ROCK MUTUAL WATER CO. ("Littlerock
9 Creek Irrigation District, et al.") in the above-entitled action. I have personal knowledge of the following
10 facts, and if called as witness, I could and would competently testify to the following.

11 2. Littlerock Creek, et al. designate the following expert witnesses to testify concerning
12 pumping from sources other than groundwater, including but not limited to surface water and salvaged
13 water. Littlerock Creek Irrigation District and certain "Llano/Big Rock" parties are pumping from a
14 known and definite channel. The experts designated herein would also testify concerning return flow off
15 of salvaged water:

16 a. Jeff Helsley and Steve Johnson from Stetson Engineers, Inc. 861 Village Oaks
17 Drive, Suite 100, Covina, CA 91724. 626-967-6202. Attached hereto as Exhibits
18 "1" and "2" respectively is a true and correct copy of the c.v. and rate sheet for
19 each expert listed herein; these are incorporated herein by reference as if set forth in
20 full.

21 3. Jeff Helsley and Steve Johnson have been retained and may be called as an expert witness
22 at the trial of this matter. They are licensed civil engineers. They will also render opinions concerning
23 the work of other experts. They have agreed to testify and will be sufficiently familiar with the pending
24 action to submit to meaningful oral depositions concerning their specific testimony, after the work of
25 other experts engaged by the public purveyors is completed.

26 4. It is estimated their direct examination is expected to last approximately one day.

27 5. They may also be called to offer testimony to rebut the testimony of other experts.

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

3 Executed this 4 day of January, 2013, in Westlake Village, California.

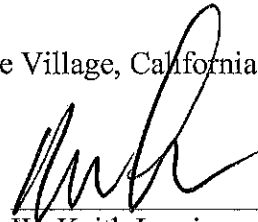
4
5 
6 W. Keith Lemieux

EXHIBIT 1

Name & Title: Jeff Helsley, P.E., Supervising Engineer	Project Assignment: Project Manager
Years of Experience with Firm 16	Years of Experience With Other Firms 12
Education: Degree(s) / Year / Specialization: M.S. Environmental Engineering / 1982 / University of Southern California, Los Angeles (USC) B.S. Civil Engineering / 1981 / California State University, Los Angeles (CSULA)	Registrations / Certifications: Civil Engineer No. 039599, California, 1985

Experience Record

Mr. Helsley joined Stetson Engineers, Inc. in 1999 as project manager for water rights quantification and valuation studies, alternative water supply studies, water resource management studies, water facilities design including site improvements for drainage and access, and groundwater recharge feasibility studies including sand and gravel pits in the San Gabriel Valley.

His experience includes employment with the Los Angeles County Department of Public Works in the Hydraulic/Water Conservation Division. As a Supervising Civil Engineer I in the Planning Unit, he was responsible for studies to develop improvements to the County's injection barriers to prevent seawater intrusion, and studies of groundwater recharge optimization.

Mr. Helsley was also formerly the District Engineer and Assistant General Manager of the Water Replenishment District of Southern California, where he was responsible for the development and implementation of programs to enhance groundwater recharge, improve groundwater basin management, and protect groundwater quality.

He is engineer for the San Luis Rey Indian Water Authority in northern San Diego County and continues to provide the SLRIWA technical support for water rights litigation. Mr. Helsley has conducted groundwater studies, reviewed the design of the large proposed imported water transmission pipeline, and prepared applications for grant funding for water resource studies for the SLRIWA.

Chino Pipeline and Facilities Improvements Project

- Well-site review, permitting and design including a drainage study and retention basin design
- Well construction oversight
- Pump testing and station design
- Nitrate Removal Treatment Plant Design
- Design for three separate pipelines
- Assistance in pipeline permitting
- Preparation of specifications and bid documents

San Luis Rey Indian Water Rights Dispute, San Diego County

Antelope Valley Groundwater Recharge and Recovery Study

San Gabriel Valley Municipal Water District 30" Pipeline Realignment

City of Pomona Water Pipeline Replacement Design

Water Supply Assessments

- The Shops at Santa Anita, Arcadia, California
- Copa de Oro Development, Rosemond, California
- Newhall County Water District, Santa Clarita Valley, California
- Uptown Specific Plan, Whittier, California
- Monrovia Nursery, Azusa/Glendora, California
- West Main Street Master Plan, Alhambra, California

Jeff Helsley, Project Engineer
(Continued)

- Valley Vision Specific Plan, San Gabriel, California

City of Monterey Park Perchlorate Treatment System Procurement

City of Glendale Wellhead Treatment Feasibility Study and Design

Wellhead Treatment Systems – San Marino Service Area, Feasibility and Options Analysis Report

Water System Master Plans

- City of Covina
- Pahrump, Nevada, included the Water System, the Sewage Collection System and Lift Stations
- Fontana Water Company
- San Gabriel Valley Water Company, Los Angeles County Division

City of San Luis Obispo Groundwater Development Project

Review of Recycled Water Use, Forest Hills Memorial Park, Covina Hills

Water Supply Feasibility Studies

- Sierra Bella Development, Lucerne Valley, California
- Sierra Lakes Development, Santa Clarita Valley, California
- Rolling Meadows Development, Tejon Ranch, California
- East Highlands Ranch, Upland, California
- Larsen Ranch, Antelope Valley, California

East Raymond Basin Water Resources Plan

Rancho Cordova Perchlorate Contamination Litigation Support

Groundwater Supply Development Cost Study, Laredo, Texas

Groundwater Yield Review, Burleson County, Texas

Wrightwood Groundwater Study

Rincon Groundwater Study

Torrez Martinez Water Feasibility Study

Spring Creek Booster Station Design

Water Rights Appraisal – Hearst Ranch

Antelope Valley Water Rights Adjudication

LAFCO Municipal Water Service Review, Santa Clarita Valley

Review of Proposal Antelope Valley Water Bank

Arrow Well Wellhead Treatment Design

Jeff Helsley, Project Engineer

(Continued)

Los Angeles County Department of Public Works (LACDPW) Alamitos Barrier Project - Seawater Barrier

- Deficiency/Feasibility Study
- Injection Well Design
- Injection Well Construction

LACDPW Dominguez Gap Barrier - Seawater Barrier, Deficiency/Feasibility Study

LACDPW West Coast Barrier Project - Seawater Barrier

- Geophysical Exploration



RESUMES

- Deficiency/Feasibility Study

Landfill Gas Mitigation Measures

County Solid Waste Management Plan

Montebello Forebay Groundwater Recharge Study

National Pollution Discharge Elimination System (NPDES) Permit Modifications

Injection Well Maintenance Study



861 Village Oaks Drive, Suite 100 • Covina, California 91724
Phone: (626) 967-6202 • FAX: (626) 331-7065 • Web site: www.stetsonengineers.com

Northern California • Southern California • New Mexico • Arizona • Nevada • Colorado

Standard Fee Schedule

	<u>\$\$ Per Hour</u>
Special Project Director	200
Principal	185
Project Manager, Senior	173
Supervisor I	173
Supervisor II	163
Supervisor III	155
Senior I	147
Senior II	131
Senior III	121
Construction Manager	120
Construction Manager/Oversight	105
Senior Construction Inspector	105
Senior Field Geologist	120
Senior Associate	110
Associate I	105
Associate II	100
Associate III	95
Senior Assistant	92
Assistant I	89
Assistant II	84
Assistant III	79
GIS Manager	105
GIS Specialist I	89
GIS Specialist II	79
Technical Illustrator	79
AutoCAD Technician	79
Aide I	68
Aide II	58
Aide III	53
Project Coordinator I	121
Project Coordinator II	89
Project Coordinator III	79
Contract Management	95
Administrative I	68
Administrative II	58
Administrative III	53

Note: Testimony fees are 150% of standard rates and apply to depositions, court time and time spent on standby at attorneys' request. Travel time and preparation time is charged at standard rates. Stetson Engineers Inc. authorizes only staff at associate classification of higher to testify as expert witnesses.

Note: Add 5% to above billing rates for contracts requiring a "Waiver of Subrogation"

Direct Expense Rates

Expense Description	Billing Rate
Fax (In-House)	\$.30/sheet
CAD (In-House)	\$15.00/hour
GIS Expense (In-House)	\$15.00/hour
Specialty Computer Expense (In-House)	\$5.00/hour
Mileage	\$.*/mile
Reproduction B & W (In-House)	\$.15/sheet
Reproduction Color 8.5 x 11 (In-House)	\$.89/sheet
Reproduction Color 11 x 17 (In-House)	\$1.89/sheet
Plotter Reproduction (In-House)	\$1.50/sq. ft.
4 x 4 Truck w/Drill Rig	\$150.00/day
Survey Equipment	\$120.00/day

*Mileage is billed at the current IRS approved mileage rate and may be subject to change.

All other project reimbursable expenses (i.e., telephone, commercial transportation, meals, lodging, postage, outside reproduction, etc.) and Subcontractor Fess are subject to a 5% administration fee.

Note: Testimony fees are 150% of standard rates and apply to depositions, court time and time spent on standby at attorneys' request. Travel time and preparation time is charged at standard rates. Stetson Engineers Inc. authorizes only staff at associate classification of higher to testify as expert witnesses.

EXHIBIT 2



Name & Title: Steve Johnson, P.E., Vice President and Managing Principal	Project Assignment: Principal Engineer
Years of Experience with Firm 34	Years of Experience With Other Firms 0
Education: Degree(s) / Year / Specialization: B.S. Civil Engineering / 1977 / California Polytechnic University, Pomona	Registrations / Certifications: Civil Engineer No. 32396, California 1981
Experience Record <p>Mr. Johnson is Vice President and Managing Principal of the Covina office of Stetson Engineers. Mr. Johnson is responsible for all engineering operations performed by the firm's southern California office, in Covina, California. Mr. Johnson's extremely broad experience covers the southern California work for well over a quarter century. As a Managing Principal, Mr. Johnson is responsible for all corporate management functions and professional engineering support services. Mr. Johnson has represented Stetson for over 30 years, continuous.</p> <p>Mr. Johnson is a designated expert for purposes of water system and water rights evaluation and appraisal. This includes qualification in U.S. Federal Court as an expert under the Daubert rules of qualification. He has provided expert witness testimony on water system/water rights condemnation actions, groundwater contamination cases, and flood damage evaluations and assessments. Mr. Johnson's expertise has supported numerous water systems and water rights transactions and settlements. He has also provided expert witness testimony of the impacts and decision-making associated with water supply contamination, before the California Public Utilities Commission, Administration Law Judge.</p> <p>Mr. Johnson is the designated "Project Engineer" for implementing cleanup of the largest groundwater contamination site in the nation, under the U.S. Environmental Protection Agency's Superfund Program. Under this assignment, Mr. Johnson coordinates with the U.S. EPA, six different water purveyors, the Main San Gabriel Basin Watermaster, the San Gabriel Basin Water Quality Authority, and numerous Responsible Parties and their engineering/legal representatives. This assignment has a current value of \$250 to \$300 million and will produce over 35,000 acre-feet of treated, potable groundwater annually. Mr. Johnson's responsibilities include all phases of project planning, financing, coordination, regulatory compliance, design, contract solicitation, construction management, operations, and performance monitoring for contamination plume control and cleanup.</p> <p>As a predecessor to this assignment, Mr. Johnson supervised the planning, design, construction, operations, and regulatory approval of the first groundwater treatment facility in the United States to successfully treat for Perchlorate and NDMA for potable consumption. This facility was also the first groundwater treatment facility to be permitted for drinking water supply under the California Department of Health Services Policy 97-005 for impaired water supplies.</p> <p>Mr. Johnson represents several prominent water agencies as "Engineer". These agencies include the Main San Gabriel Basin Watermaster, the Upper San Gabriel Valley Municipal Water District, the San Gabriel Valley Municipal Water District, and the San Gabriel Basin Water Quality Authority. Typical assignments include safe yield studies, groundwater contamination characterization and remediation, design, construction management, rate assessment, water supply studies, and reports to the board.</p> <p>Since the early 1980s, Mr. Johnson has been heavily involved with engineering solutions to contamination of drinking water supplies. This work involves a wide range of experience and expertise, including site and regional characterization of soil and groundwater contamination, hydrogeologic studies, groundwater basin modeling, development of cleanup and water supply plans, remediation studies, development and full implementation of treatment projects, and coordination with all regulatory agencies. The contaminants of concern include volatile organic compounds (VOCs), Perchlorate, NDMA, 1-4-dioxane, Chromium and others. This work has been performed in full cooperation with the U.S. Environmental Protection Agency, the State Department of Toxic Substance Control, the Department of Health Services, the State Water Resources Control Board, and the Regional Water Quality Control Board.</p>	

Steve Johnson, Principal Engineer

(Continued)

The following projects are representative of Mr. Johnson's experience:

City of Los Angeles, Department of Water and Power. Supplemental Water Study.

City of Los Angeles, Department of Water and Power. Hoover Dam Power Contracts.

Upper San Gabriel Valley Municipal Water District

- Supervision of District Engineering Duties
- Area Wide Water Quality Monitoring Plan
- AB 1803 Water Quality Monitoring Plan
- AB 797 Water Conservation Plan
- Feasibility Studies - Use of Reclaimed Water
- Supervision of EPA Superfund Sub-Contract
- Drought Studies
- Puente Hills Landfill Investigation
- District Mapping
- Reclaimed Water Study
- Direct Use Project

San Gabriel River Watermaster. Named one of the three Watermasters in 2011

City of Bakersfield

- Design of Turnout Structure - Kern River
- Design of Turnout Structure - Canal
- Water System Master Plan
- Review of New Development Plans
- Design of Box Culvert
- Acquisition of New Facilities
- Water System Operations Study

Santa Ynez River Water Conservation District

- Design of Reservoir Renovation
- Design of Lake Cachuma Intake Facility
- Design of Well Fields (6.0 cfs, 4.0 cfs and 1.73 cfs)
- Design of Booster Station
- Administration of State Loan and Grant
- Supervision of Cathodic Protection
- Design of Well No. 15 Pumping Equipment
- Lake Cachuma Intake Maintenance
- Zone III Reservoir Design
- Cachuma Pipeline Rehabilitation

Steve Johnson, Principal Engineer
(Continued)

- SWP Facilities Design

East Pasadena Water Company. Design of Water Main Extensions for Fire Service.

Kaiser Steel. Valuation of Water Related Holdings at Fontana Plant.

City of Solvang

- Design of Wells No. 7 and 8 Water Supply

San Gabriel Valley Municipal Water District

- Feasibility Study Hydroelectric Generation Stations
- Continuing Developer Interaction Responsibilities
- Supervision of Periodic Pipeline As-Built Updates
- Feasibility Study and Acquisition for Turnout Structure
- Transmission Pipeline Rehabilitation Project
- State Water Project Entitlement Report
- Urban Water Management Plans
- Pipeline Extension Project

City of Industry. Master Plan of Development

Main San Gabriel Basin Watermaster

- Supervision of Engineering Duties
- Basin Water Quality Studies
- Basin Modeling
- Enforcement of Pumping Control
- Operable Unit Cleanup Plans
- BPOU Cleanup Project
- Full Compliance Permitting

Puente Basin Watermaster. Supervision of Engineering Duties

Buellton Community Services District

- Water System Design
- Sewer System Design

City of Torrance. Feasibility Study on Hydroelectric Generation

Mr. Riley Metz. Site Drainage Study and Improvement

Mr. Redmond. Flood Damage Study

Boy Scouts of America. Flood Damage Study

Rapid Transit District. Waste Discharge Study

Mr. Lapin. Flood Damage Study

Steve Johnson, Principal Engineer
(Continued)

U.S. Department of Navy, Camp Pendleton

- Water System Study
- Water System Design

City of Claremont. Representative on Proposed Quarry Development

Cabazon Water Company. Valuation Study

HLM Water System. Valuation Study

Citizens Utilities Company. Valuation of Jackson Water Works

County of San Bernardino. Safe Yield Study

Walsh v. State of California. Flood Damage Study

Three Valleys Municipal Water District. Subagency Report

Morongo Water System. Valuation Study

La Quinta Water System. Valuation Study

City of Ontario. Flood Damage Study

Serrano Park Homeowners Association. Flood Plain Improvements

California Department of Fish and Game. Valuation of Water Rights at Indian Joe Spring

Sunnymead Ranch Lake Reconstruction

City of Livermore and California Water Service. Trade of Service Areas – Arbitration

Sparkletts Water. Water Supply Study

Cancun Racquet Club. Subsidence Evaluation

East Highlands Ranch. Water Rights and Consultation Work

Covina Irrigating Company Valuation

Hartman Farms (Ohio). Coordination of basin recharge with rock and sand operations

Turner Ranches Valuation of Sanitary System

City of Barstow

- Water Rights
- Mohave River Water Quality Evaluations
- Contaminant Investigations

City of Glendora. Conjunctive Use Study

Lewis Homes Management Corp. Water Resources and Supply Studies

City of Oceanside Water Resources Study

City of Upland. Water Rights Evaluation

Steve Johnson, Principal Engineer
(Continued)

San Gabriel Basin Water Quality Authority

- Consulting Services
- Arrow Well Project
- Big Dalton Project
- Monrovia Project

City of Bullhead City, Wastewater Treatment Plant Evaluation

Azusa Valley Water Company Valuation

American Water Works. Well Design

City of Covina. Valuation of Covina Irrigating Company

Suburban Water Systems. Valuation of Facilities

City of Whittier Urban Water Plans

Lewis Homes, Monrovia Nursery Water Resources

Beverly Acres Mutual Water User's Association Valuation

Southern California Water Company, Staff Projects

City of Oceanside - Water Resources Study

Prado Dam Flood Damage - Perrizo

Chino Basin Watermaster - Engineering

Santa Margarita Water District - Appraisal

San Gabriel Valley Water Co. v. Sanitation Districts

Tri-Cities/Camp Pendleton - Economic Evaluation of Conjunctive Use Water Supply Project

Three Valleys Water District - General Engineering

San Gabriel River Water Committee - General Engineering

City of Beverly Hills - Water Distribution System Analysis

Valley County Water District - Urban Water Management Plan

Valley County Water District - General Engineering

Montebello Land and Water Company

City of Oceanside - Water Rights and System Modeling

City of Oxnard - Water Quality

Raymond Basin - Perchlorate Study

Star Kist Foods - Water Rights Evaluation

Orange County Water District - Prado Basin Constructed Wetlands

East Highlands Ranch - Water Supply

Elsinore Water District Well Interference

RESUMES



Steve Johnson, Principal Engineer
(Continued)

LPVCWD Perchlorate/NDMA Facility

Tejon Ranch Water/Sanitation

City of San Diego Studies

DHS Permitting - Policy 97-005

SEMOU Cleanup Plans

SCWC SEMOU Water

San Jacinto-Hemet Groundwater Management Plan

Baldwin Park Operable Unit – Groundwater Cleanup Project

San Gabriel Valley Water Company (SGVWC) – General Rate Case Filing Before the Public Utilities Commission for SGVWC's Fontana Water Company Division

People v. Rosemead

CalTrans v. San Antonio Lakes Partners, et al.

State of New Mexico, et al. v General Electric company

American States Water Company et al. v State of California et al., & Aerojet-General Corporation, et al.

Suburban Water Systems Rate Case before the Public Utilities Commission



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Construction Manager/Oversight	105
Senior Construction Inspector	105
Senior Field Geologist	120
Senior Associate	110
Associate I	105
Associate II	100
Associate III	95
Senior Assistant	92
Assistant I	89
Assistant II	84
Assistant III	79
GIS Manager	105
GIS Specialist I	89
GIS Specialist II	79
Technical Illustrator	79
AutoCAD Technician	79
Aide I	68
Aide II	58
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Project Coordinator I	121
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1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA,)
3) ss.
4 COUNTY OF VENTURA)

5 I am employed in the County of Ventura, State of California. I am over the age of 18 and not a
6 party to the within action. My business address is 4165 E. Thousand Oaks Blvd., Suite 350, Westlake
Village, California 91362.

7 On **January 4, 2013**, I posted the following document(s) to the website <http://www.scefilling.org>,
8 a dedicated link to the Antelope Valley Groundwater Cases, and upon which the parties have agreed this
posting constitutes service.

9 **LITTLEROCK CREEK IRRIGATION DISTRICT'S, WITNESS DISCLOSURE FOR PHASE**
10 **FOUR TRIAL; DECLARATION OF W. KEITH LEMIEUX**

11 By electronically serving through <http://www.scefilling.org>, and addressed to all parties appearing
12 on the <http://www.scefilling.org> electronic service list, the file transmission was reported as complete and
a copy of the <http://www.scefilling.org> Filing/Service Receipt will be maintained with a copy of the
document in our office.

13 I am readily familiar with the business practice for collection and processing of pleadings and
14 discovery for electronic service with <http://www.scefilling.org>, and that the pleadings and discovery shall
15 be electronically served this same day in the ordinary course of business.

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

17 Executed on January 4, 2013, in Westlake Village, California.

18
19 /s/

20 _____
21 Kathi Miers
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