

WAYNE K. LEMIEUX (SBN 43501)
W. KEITH LEMIEUX (SBN 161850)
CHRISTINE CARSON (SBN 188603)
LEMIEUX & O'NEILL
4165 E. Thousand Oaks Blvd., Suite 350
Westlake Village, CA 91362
Telephone: (805) 495-4770
Facsimile: (805) 495-2787

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

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT

Coordinated Proceeding
Special Title (Rule 1550(b))

Judicial Council Coordination No. 4408

ANTELOPE VALLEY GROUNDWATER
CASES

Santa Clara Case No. 1-05-CV-049053
Assigned to the Honorable Jack Komar – Dept. 12

Included Actions:

**NON-EXPERT WITNESS DISCLOSURE FOR
PHASE FOUR TRIAL**

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

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

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

AND RELATED CROSS-ACTIONS

LITTLEROCK CREEK IRRIGATION DISTRICT, PALM RANCH IRRIGATION DISTRICT, NORTH EDWARDS WATER DISTRICT, DESERT LAKE COMMUNITY SERVICES DISTRICT, LLANO DEL RIO WATER CO., LLANO MUTUAL WATER COMPANY, BIG ROCK MUTUAL WATER COMPANY hereby disclose non-expert witnesses they intend to call during the Phase 4 Trial, set for February 11, 2013, as follows:

Name of Witness and Party Designating	Subject and Brief Description of Testimony
Dollie Kostopoulos, General Manager of North Edwards Water District. Depo. Avail. TBD. Not available January 31, 2013.	Person Most Knowledgeable ("PMK") and same subjects as discovery disclosures. Rebuttal witness if needed also.
Dollie Kostopoulos, General Manager of Desert Lake Community Services District. Depo. avail. TBD. Not available January 31, 2013.	PMK and same subjects as discovery disclosures. Rebuttal witness if needed also.
Water operator for North Edwards Water District and Desert Lake Community Services District, James Allen, may be called. Not available January 31, 2013.	Certain subjects in discovery disclosures or as rebuttal witness.
DeAnna Love, Secretary/Treasurer of Desert Lake Community Services District. TBD.	For authentication of certain records or for certain subjects in discovery. Rebuttal witness if needed also.
Peter Tuculet, General Manager of Palm Ranch Irrigation District. Depo avail. TBD.	PMK and same subjects as discovery disclosures. Rebuttal witness if needed also.
Brad Bones, General Manager of Littlerock Creek Irrigation District. Depo. avail. TBD	PMK and same subjects as discovery disclosures. Rebuttal witness if needed also.
John Blalock, President of Llano del Rio Water Company, Secretary of Llano Mutual Water Company and President of Big Rock Mutual Water Company. Depo. Avail. TBD.	PMK and same subjects as discovery disclosures. Rebuttal witness if needed also.
James Lombardi, President of Llano Mutual Water Company, Board Member of Big Rock Mutual Water Company. Depo. Avail. TBD.	Same subjects as discovery disclosures. Rebuttal witness if needed also.

//

//

//

//

Designating parties reserve the right to call additional witnesses including but not limited to rebuttal witnesses.

DATED: January 4, 2013

LEMIEUX & O'NEILL

By: /s/ W. Keith Lemieux

W. KEITH LEMIEUX

Attorneys for LITTLE ROCK CREEK IRR. DIST., PALM RANCH IRR. DIST., NORTH EDWARDS WATER DIST., DESERT LAKE COMMUNITY SERVICES DIST., LLANO DEL RIO WATER CO., LLANO MUTUAL WATER CO., BIG ROCK MUTUAL WATER COMPANY

STATE OF CALIFORNIA,)
) ss.
COUNTY OF VENTURA)

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

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

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

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

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

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

/s/

Kathi Miers