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GOVERNMENT CODE § 6103

4 Attorneys for Cross-Defendants,
5 County Sanitation Districts of Los Angeles
County Nos. 14 and 20
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7
8 SUPERIOR COURT OF CALIFORNIA
9 COUNTY OF LOS ANGELES
10

11 Coordination Proceeding
Special Title (Rule 1550(b))

Judicial Council Coordination
Proceeding No. 4408

12 **ANTELOPE VALLEY GROUNDWATER**
13 **CASES**

ASSIGNED FOR ALL PURPOSES TO:
Judge: Honorable Jack Komar

14 Included Actions:

15 Los Angeles County Waterworks District No. 40 v.
Diamond Farming Co.
16 Superior Court of California, County of Los Angeles,
Case No. BC 325 201

EXPERT WITNESS
DESIGNATION FOR PHASE 4
TRIAL

17 Los Angeles County Waterworks District No. 40 v.
18 Diamond Farming Co.
Superior Court of California, County of Kern,
19 Case No. S-1500-CV-254-348

Trial Date: February 11, 2013
Time: 9:00 a.m.
Location: Department 1
Los Angeles County
Superior Court

20 Wm. Bolthouse Farms, Inc. v. City of Lancaster
Diamond Farming Co. v. City of Lancaster
21 Diamond Farming Co. v. Palmdale Water Dist.
Superior Court of California, County of Riverside,
22 consolidated actions, Case Nos. RIC 353 840, RIC
344 436,
23 RIC 344 668.

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

2 Please take notice that cross-defendants County Sanitation Districts of Los Angeles
3 County Nos. 14 and 20 (“Districts”) hereby designate Ray Tremblay, P.E. as their expert witness
4 in the Phase 4 Trial pursuant to Code of Civil Procedure §2034.210 and the Court’s Case
5 Management Order for Phase 4 trial. Mr. Tremblay is an employee of the Districts located at
6 1955 Workman Mill Rd., Whittier, CA 90601-1400. Mr. Tremblay is available for deposition at
7 a reasonable time, on normal non-holiday workdays Monday through Friday during the month of
8 January.

9 The Districts also designate any witness whose testimony may be regarded as expert
10 whose name has been , or will be, revealed by discovery or further discovery in this action and
11 those experts who may be designated by other parties to this action.

12 The Districts reserve their rights pursuant to Code of Civil Procedure section 2034.280
13 and 2034.310, as well as any other constitutional, statutory or common law rights they may have,
14 to name other experts before trial or to call to testify at trial experts not named, whose testimony
15 is needed to aid in the prosecution of this action or refute or rebut the contentions and testimony
16 of any other expert.

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18 Respectfully submitted,

19 ELLISON, SCHNEIDER & HARRIS, LLP

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21 By: 

22 Christopher M. Sanders
23 Attorneys for Cross-Defendants,
24 County Sanitation Districts of Los
25 Angeles County Nos. 14 and 20
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1 I, Christopher M. Sanders, declare:

2 1. I am a state of California licensed attorney and a partner with the law firm of
3 Ellison, Schneider & Harris, LLP, attorneys of record for County Sanitation Districts of Los
4 Angeles County Nos. 14 and 20. I have personal knowledge of each fact herein.

5 2. Cross-defendants, County Sanitation Districts of Los Angeles County Nos. 14 &
6 20 intend to offer at trial, either orally or by deposition testimony, the expert testimony of
7 Raymond Tremblay.

8 3. Mr. Tremblay has agreed to testify as an expert witness at the Phase 4 trial.


9 4. Mr. Tremblay is a California licensed civil engineer, employed by the Districts as
10 Assistant Department Head, Facilities Planning. Mr. Tremblay has both a Bachelor's and
11 Master's degree in civil engineering.

12 5. Mr. Tremblay will testify to the operations of the Districts' treatment facilities,
13 agricultural water use, reasonable and beneficial use of water, and the fate and transport of
14 recycled water return flows. At this time, Mr. Tremblay has not prepared any written,
15 discoverable reports or writings covered by C.C.P. §2034.270, except for certain exhibits
16 attached to the Districts' discovery responses. Should this witness prepare any written report
17 relating to the opinions to be given, the Districts will file a supplement to this designation.

18 6. Mr. Tremblay will be sufficiently familiar with the pending court adjudication to
19 submit a meaningful oral deposition concerning his respective testimony.

20 7. Mr. Tremblay, as an employee of the Districts, is available for deposition during
21 regularly scheduled workdays during the month of January. Mr. Tremblay's hourly fee is \$125
22 plus travel time and expenses.

23 8. I declare under penalty of perjury under the laws of the State of California that the
24 foregoing is true and correct, and that this declaration was executed in Sacramento, California on
25 January 4, 2013.

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27 
28 Christopher M. Sanders

1 **PROOF OF SERVICE**

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3 I declare that:

4 I am employed in the County of Sacramento, State of California. I am over the age of
5 eighteen years and am not a party to the within action. My business address is ELLISON,
6 SCHNEIDER & HARRIS; 2600 Capitol Avenue, Suite 400; Sacramento, California 95816;
7 telephone (916) 447-2166.

8 On January 4, 2013, I served the County Sanitation Districts' *EXPERT WITNESS*
9 *DESIGNATION FOR PHASE 4 TRIAL* by electronic posting to the Santa Clara Superior Court
10 E-Filing website, <http://www.scefiling.org/cases/casehome.jsp?caseId=19>.

11 I declare under penalty of perjury that the foregoing is true and correct and that this
12 declaration was executed on January 4, 2013, at Sacramento, California.

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15 _____
16 Patty Slomski
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