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Copa De Oro Land Company

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES**

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

**ANTELOPE VALLEY GROUNDWATER  
CASES**

**Included Actions:**

**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.  
Lancaster, Diamond Farming Co. v.  
Palmdale Water Dist., Superior Court of  
California, County of Riverside, Case No.  
RIC 353 840, RIC 344 436, RIC 344 668**

**JUDICIAL COUNCIL COORDINATION  
PROCEEDING NO. 4408**

**Case No. BC 391869  
Assigned to Hon. Jack Komar**

**(Santa Clara Case No. 01-05-CV-049053)**

**CROSS-DEFENDANT COPA DE ORO  
LAND COMPANY'S DISCLOSURE OF  
WITNESSES AND EXHIBITS  
REGARDING PROVE-UP OF THE  
PROPOSED STIPULATED JUDGMENT  
AND PHYSICAL SOLUTION**

**Date: August 3, 2015  
Time: TBD  
Dept.: TBD**

8792VP042715

**COPA DE ORO LAND COMPANY'S DISCLOSURE OF WITNESSES AND EXHIBITS**

1 TO ALL PARTIES AND TO ALL PARTIES' ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that, in accordance with the Court's Second Case  
3 Management Order dated March 27, 2015, cross-defendant Copa de Oro Land Company  
4 ("Copa de Oro") discloses the following witnesses and exhibits regarding the prove-up of the  
5 [Proposed] Stipulated Judgment and Physical Solution trial as follows:

6  
7 Expert Witnesses:

8 1. Vera H. Nelson, P.E. (past water use on Copa de Oro's Antelope Valley  
9 property) (estimated time for testimony: 1 hour).

10 2. Dennis Williams (non-retained shared expert witness with Public Water  
11 Suppliers – regarding the Proposed Physical Solution).

12 3. Robert Beeby (non-retained shared expert witness with Public Water Suppliers –  
13 regarding reasonable and beneficial use of water by the settling parties).

14 4. Robert Wagner (non-retained shared expert witness with AVEK and overlying  
15 landowners – regarding the Proposed Physical Solution).

16 5. Charles Binder (non-retained shared expert witness with AVEK and overlying  
17 landowners – regarding the Proposed Physical Solution).

18 6. David Peterson (non-retained shared expert witness with AVEK and overlying  
19 landowners – regarding reasonable and beneficial use of water by the settling parties).

20  
21 At this time, Copa de Oro cannot provide an estimated time for testimony by the non-  
22 retained shared expert witnesses.

23 This list of witnesses does not include any witnesses to be called for rebuttal or  
24 impeachment, if any. In addition to the witnesses listed above, Copa de Oro reserves the right  
25 to supplement or add to this list of witnesses if necessary.

1           Exhibits:<sup>1</sup>

- 2           1.     Erler & Kalinowski, Inc., Expert Report on Water Use at the Copa de Oro  
3 Property, Kern County, California;
- 4           2.     Erler & Kalinowski, Inc., Supplement to Expert Report on Water Use at the  
5 Copa de Oro Property, Kern County, California: Monthly AVEK Deliveries Data;
- 6           3.     Erler & Kalinowski, Inc., LANDSATLook satellite images of the Property from  
7 August 11, 2002, August 27, 2002, September 12, 2002 and September 28, 2002, and related  
8 analysis (analysis of acres irrigated in 2002);
- 9           4.     Resume for Ms. Vera H. Nelson, P.E.;
- 10          5.     Stipulation Regarding Facts Pertaining to Copa de Oro Land Company;
- 11          6.     Stipulation for Phase IV Trial Regarding Water Use on Copa de Oro Land  
12 Company's Property;
- 13          7.     Order Approving Stipulations Concerning Copa de Oro Land Company and  
14 Granting Leave to Serve Written Discovery; and
- 15          8.     Copa de Oro Land Company's First Set of Requests for Admissions Propounded  
16 on Parties that are Not Signatories to the Stipulations Concerning Copa de Oro Land Company;
- 17          9.     A certified copy of the Grant Deed to the northern half of the Property (recorded  
18 in Kern County Official Records as Document #0196037023);
- 19          10.    A certified copy of the Grant Deed to the southern half of the Property (recorded  
20 in Kern County Official Records as Document #0206184323);
- 21          11.    A copy of a Turnout Easement (recorded at Book 5013, Page 2049, in Kern  
22 County Official Records);
- 23          12.    A copy of a Grant Deed concerning a water line easement (recorded at Book  
24 5511, Page 1008, in Kern County Official Records);
- 25          13.    Photographs of turnout 11.6 structure;
- 26

27                   <sup>1</sup> All proposed exhibits, except exhibits numbers three and sixteen, are available on  
28 [www.scefiling.org](http://www.scefiling.org) in previous filings in this litigation.

- 1           14.     Photographs of structures at the center of the Property; and  
2           15.     Photographs of concrete structures on the Property.  
3           16.     Property survey by Land Design Consultants, Inc. for Palmer Investments, Inc.,  
4     dated March 29, 2006.

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6           Copa de Oro reserves the right to supplement or add to this list of exhibits if necessary.

7  
8     Dated: April 27, 2015

Respectfully submitted,

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10           BARTKIEWICZ, KRONICK & SHANAHAN  
A Professional Corporation

11  
12     By: 

13           Andrew J. Ramos

14           Attorneys for Cross-Defendant  
15           Copa de Oro Land Company

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I am a citizen of the United States and a resident of Sacramento County. I am over the age of 18, not a party to this action and am employed at Bartkiewicz, Kronick & Shanahan, 1011 Twenty-Second Street, Sacramento, California 95816. On April 27, 2015, I served, in the manner described below, the following document:

I posted this document to the Court's World Wide Website at [www.scefilings.org](http://www.scefilings.org).

Executed at Sacramento, California on April 27, 2015.

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