

1
2
3
4 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
5 **COUNTY OF LOS ANGELES**
6

7 Coordination Proceeding
8 Special Title (Rule 1550(b))

9 **ANTELOPE VALLEY**
10 **GROUNDWATER CASES**

11 Included Actions:

12 Los Angeles County Waterworks District
13 No. 40 v. Diamond Farming Co.
14 Superior Court of California
15 County of Los Angeles, Case No. BC
16 325201

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

21 Wm. Bolthouse Farms, Inc. v. City of
22 Lancaster Diamond Farming Co. v. City of
23 Lancaster Diamond Farming Co. v. Palmdale
24 Water Dist. Superior Court of California,
25 County of Riverside, consolidated actions,
26 Case Nos. RIC 353840, RIC 344436, RIC
27 344668
28

Judicial Council Coordination Proceeding
No. 4408

SC Case No. 105CV 049053
Assigned to Hon. Jack Komar

Craig Van Dam, Marta Van Dam, Nick Van
Dam, Janet Van Dam, Gertrude J. Van Dam,
Delmar D. Van Dam and Gertrude J. Van
Dam as Trustees of the Delmar D. and
Gertrude J. Van Dam Family Trust – 1996,
Gary Van Dam, High Desert Dairy
Partnership, High Desert Dairy, et. al., (Each
And All Van Dam Parties) and WDS
California II, LLC's Disclosure of Witnesses
and Exhibits Regarding Prove-Up of the
[Proposed] Stipulated Judgment And
Physical Solution Trial

DATE: August 3, 2015
TIME: TBD
DEPT: TBA

1 TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that in accordance with Court's Second Case Management
3 Order dated March 27, 2015, Craig Van Dam, Marta Van Dam, Nick Van Dam, Janet Van
4 Dam, Gertrude J. Van Dam, Delmar D. Van Dam and Gertrude J. Van Dam as Trustees of the
5 Delmar D. and Gertrude J. Van Dam Family Trust – 1996, Gary Van Dam, High Desert Dairy
6 Partnership, High Desert Dairy, et. al. (Each And All Van Dam Parties) and WDS California II,
7 LLC's ("Parties") hereby disclose the following witnesses and exhibits regarding the prove-up
8 of the [Proposed] Stipulated Judgment and Physical Solution trial as follows:

9 Witnesses:

- 10 1. Craig Van Dam – Claim of reasonable and beneficial use by Craig Van Dam, et. al.
- 11 2. Gary Van Dam – Claim of reasonable and beneficial use by Gary Van Dam, et. al.
- 12 3. David Dorrance -- Claim of reasonable and beneficial use by WSD California II,
13 LLC
- 14 4. Carl F. Voss, Jr., -- Business Records of Grimmway Enterprises, Inc.
- 15 5. Fredrick J. Koch III – Business Records of Southern California Edison
- 16 6. Dr. Dennis Williams – (Non-Retained Shared Expert) Recommendation of the
17 [Proposed] Judgment & Physical Solution
- 18 7. Robert G. Beeby – (Non-Retained Shared Expert) Reasonable and beneficial use of
19 water by Stipulating Parties
- 20 8. David H. Peterson, CEG, CHG -- (Non-Retained Shared Expert) Reasonable and
21 beneficial use of water by Stipulating Parties
- 22 9. Robert Wagner -- (Non-Retained Shared Expert) Recommendation of the [Proposed]
23 Judgment & Physical Solution
- 24 10. Charles W. Binder -- (Non-Retained Shared Expert) Recommendation of the
25 [Proposed] Judgment & Physical Solution

26 The above list does not include any witnesses to be called for rebuttal and impeachment,
27 if any. In addition to the witnesses listed above, the Parties reserve the right to supplement or
28 add to this list of witnesses if necessary.

Exhibits:

1. 4-VANDAMCRAIG-1 Stipulation With Craig Van Dam For Phase 4 Trial;
2. 4-VANDAMCRAIG-2 Business Records Affidavit of Carl F. Voss, Jr. Grimmway Enterprises, Inc., On Behalf of Craig Van Dam Pursuant to Evidence Code Sections 1560-1562;
3. 4-VANDAMCRAIG-3 Business Records Affidavit of Frederick J. Koch III, Southern California Edison, On Behalf of Craig Van Dam Pursuant to Evidence Code Sections 1560-1562;
4. 4-VANDAMCRAIG-4 Response of Craig Van Dam to Court Ordered Discovery For Phase 4 Trial;
5. 4-VANDAMCRAIG-5 Declaration of Craig Van Dam in Lieu of Deposition Testimony For Phase 4 Trial;
6. 4-VANDAMCRAIG-6 First Supplemental Declaration of Craig Van Dam in Lieu of Deposition Testimony For Phase 4 Trial.
7. 4-VANDAMFARMS-1 Stipulation with Delmar D. Van Dam, Gertrude J. Van Dam, and Gary Van Dam For Phase 4 Trial;
8. 4-VANDAMFARMS-2 Business Records Affidavit of Frederick J. Koch III, Southern California Edison, On Behalf of Gary Van Dam Pursuant to Evidence Code Sections 1560-1562;
9. 4-VANDAMFARMS-3 Response of Delmar D. Van Dam, Gertrude J. Van Dam, and Gary Van Dam to Court Ordered Discovery For Phase 4 Trial;
10. 4-VANDAMFARMS-4 First Supplemental Declaration of Delmar D. Van Dam, Gertrude J. Van Dam, and Gary Van Dam to Court Ordered Discovery For Phase 4 Trial;
11. 4-VANDAMFARMS-5 Declaration of Gary Van Dam in Lieu of Deposition Testimony For Phase 4 Trial
12. 4-VANDAMFARMS-6 First Supplemental Declaration of Gary Van Dam in Lieu of Deposition Testimony For Phase 4 Trial.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

13. 4-WDS-1

Stipulation With WDS California II, LLC For Phase 4 Trial;

14. 4-WDS-2

Business Records Affidavit of Carl F. Voss, Jr., Grimmway Enterprises, Inc., On Behalf of WDS California II, LLC Pursuant to Evidence Code Sections 1560- 1562;

15. 4-WDS-3

Business Records Affidavit of Frederick J. Koch III, Southern California Edison, On Behalf of WDS California II, LLC Pursuant to Evidence Code Sections 1560- 1562;

16. 4-WDS-4

Response of WDS California II, LLC to Court Ordered Discovery For Phase 4 Trial;


17. 4-WDS-5

Declaration of WDS California II, LLC in Lieu of Deposition Testimony For Phase 4 Trial.

In addition to the exhibits listed above, the Parties reserve the right to supplement or add to this list of exhibits if necessary.

Dated: April 27, 2015

THE LAW OFFICES OF YOUNG WOOLDRIDGE, LLP

By: 
SCOTT K. KUNEY, Attorneys for Craig Van Dam, Marta Van Dam, Nick Van Dam, Janet Van Dam, Gertrude J. Van Dam, Delmar D. Van Dam and Gertrude J. Van Dam as Trustees of the Delmar D. and Gertrude J. Van Dam Family Trust – 1996, Gary Van Dam, High Desert Dairy Partnership, High Desert Dairy, et. al. (Each and All Van Dam Parties) and WDS California II, LLC

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF KERN


I, KRISTEN L. MOEN, declare: I am and was at all times of the service hereunder mentioned, over the age of eighteen (18) years. My business address is: 1800 30th Street, Fourth Floor, Bakersfield, CA 93301.

On April 27, 2015, I caused to be served the below listed document(s) entitled as: **Craig Van Dam, Marta Van Dam, Nick Van Dam, Janet Van Dam, Gertrude J. Van Dam, Delmar D. Van Dam and Gertrude J. Van Dam as Trustees of the Delmar D. and Gertrude J. Van Dam Family Trust – 1996, Gary Van Dam, High Desert Dairy Partnership, High Desert Dairy, et. al., (Each And All Van Dam Parties) and WDS California II, LLC's Disclosure of Witnesses and Exhibits Regarding Prove-Up of the [Proposed] Stipulated Judgment And Physical Solution Trial**, on the interested parties in this action:

☒ (BY POSTING) I posted the document listed above to the Santa Clara Superior Court website regarding the Antelope Valley Groundwater matter pursuant to the Court's Clarification Order. Electronic service posting completed through www.sceffiling.org.

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

Executed on April 27, 2015, at Bakersfield, California



KRISTEN L. MOEN