

Edward J. Casey (SBN 119571)
Andrew Brady (SBN 273675)
ALSTON & BIRD LLP
333 South Hope Street, 16th Floor
Los Angeles, CA 90071-1410
Telephone: 213-576-1000
Facsimile: 213-576-1100
ed.casey@alston.com
andrew.brady@alston.com

Attorneys for Cross-Defendant
NORTHROP GRUMMAN SYSTEMS CORPORATION

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

ANTELOPE VALLEY
GROUNDWATER CASES

INCLUDED ACTIONS:

LOS ANGELES COUNTY
WATERWORKS DISTRICT NO. 40 v.
DIAMOND FARMING COMPANY, et
al., Los Angeles Superior Court Case No.
BC325201;

LOS ANGELES COUNTY
WATERWORKS DISTRICT NO. 40 v.
DIAMOND FARMING COMPANY, et
al., Kern County Superior Court Case
No. S-1500-CV-254-348;

DIAMOND FARMING COMPANY,
and W.M. BOLTHOUSE FARMS, INC.,
v. CITY OF LANCASTER, et al.,
Riverside Superior Court Case No. RIC
344436 [c/w case no. RIC 344668 and
355840]

Judicial Council Coordination No. 4408
Case No. 1-05-CV-049053
Assigned to The Honorable Jack Komar

**CROSS-DEFENDANT NORTHROP
GRUMMAN SYSTEMS CORPORATION'S
DISCLOSURE OF WITNESSES AND
EXHIBITS REGARDING PROVE-UP TRIAL
RE: [PROPOSED] STIPULATED JUDGMENT
AND PHYSICAL SOLUTION**

DATE: August 3, 2015
TIME: 10:00 a.m.
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, Cross Defendant Northrop Grumman Systems Corporation
4 ("Northrop Grumman") hereby discloses the following witnesses and exhibits regarding the
5 prove-up of the [Proposed] Stipulated Judgment and Physical Solution trial, commencing August
6 3, 2015, as follows:

7 Witnesses:

- 8 1. Troy Gabbard – Reasonable and beneficial use, property ownership;
- 9 2. Dennis Williams – Recommendation of the [Proposed] Judgment & Physical
10 Solution (non-retained joint expert with other settling parties);
- 11 3. Robert G. Beeby – Reasonable and beneficial use of water by Stipulating Parties
12 (non-retained joint expert with other settling parties);
- 13 4. David Peterson – Reasonable and beneficial use of water by Stipulating Parties
14 (non-retained joint expert with other settling parties);
- 15 5. Robert Wagner [*Charles W. Binder*] – Recommendation of the [Proposed]
16 Judgment & Physical Solution (non-retained joint expert with other settling parties).

17 The above list does not include any witnesses to be called for rebuttal and impeachment,
18 if any. In addition to the witnesses listed above, Northrop Grumman reserves the right to
19 supplement or add to this list of witnesses, if necessary.

20 Exhibits:

- | | | |
|----|------------------------|---|
| 21 | 1. 4-NORTHROP-1 | Declaration of Troy Gabbard in Lieu of Deposition |
| 22 | | Testimony for Phase 4 Trial; |
| 23 | 2. 4-NORTHROP-2 | Response to December 12, 2012 Discovery |
| 24 | | Order for Phase 4 Trial; |
| 25 | 3. 4-NORTHROP-3 | Stipulation Concerning Land Ownership and Prior |
| 26 | | Groundwater Production; |
| 27 | 4. 4-NORTHROP-4 | Stipulation Concerning Land Ownership and Prior |
| 28 | | Groundwater Production. |

1 In addition to the exhibits listed above, Northrop Grumman reserves the right to
2 supplement or add to this list of exhibits, if necessary.

3
4 DATED: April 27, 2015

EDWARD J. CASEY
ANDREW BRADY
ALSTON & BIRD LLP

6
7 
8 Andrew Brady
Attorneys for Cross-Defendant
9 **NORTHROP GRUMMAN SYSTEMS CORPORATION**

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

I, Yolanda S. Ramos, declare:

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is Alston & Bird LLP, 333 South Hope Street, Sixteenth Floor, Los Angeles, CA 90071.

On April 27, 2015, I served the document(s) described as **CROSS-DEFENDANT NORTHROP GRUMMAN SYSTEMS CORPORATION'S DISCLOSURE OF WITNESSES AND EXHIBITS REGARDING PROVE-UP TRIAL RE: [PROPOSED] STIPULATED JUDGMENT AND PHYSICAL SOLUTION** on the interested parties in this action by enclosing the document(s) in a sealed envelope addressed as follows:

☐ BY MAIL: I am "readily familiar" with this firm's practice for the collection and the processing of correspondence for mailing with the United States Postal Service. In the ordinary course of business, the correspondence would be deposited with the United States Postal Service at 333 South Hope Street, Los Angeles, California 90071 with postage thereon fully prepaid the same day on which the correspondence was placed for collection and mailing at the firm. Following ordinary business practices, I placed for collection and mailing with the United States Postal Service such envelope at Alston & Bird LLP, 333 South Hope Street, Los Angeles, California 90071.

☒ BY ELECTRONIC MAIL: By posting the document listed above to the Santa Clara Superior Court website: www.scefilng.org regarding the ANTELOPE VALLEY GROUNDWATER matter.

☐ BY FEDERAL EXPRESS ☐ UPS NEXT DAY AIR ☐ OVERNIGHT DELIVERY: I deposited such envelope in a facility regularly maintained by ☐ FEDERAL EXPRESS ☐ UPS ☐ Overnight Delivery [specify name of service:] with delivery fees fully provided for or delivered the envelope to a courier or driver of ☐ FEDERAL EXPRESS ☐ UPS ☐ OVERNIGHT DELIVERY [specify name of service:] authorized to receive documents at Alston & Bird LLP, 333 South Hope Street, Los Angeles, California 90071 with delivery fees fully provided for.

☐ BY FACSIMILE: I telecopied a copy of said document(s) to the following addressee(s) at the following number(s) in accordance with the written confirmation of counsel in this action.

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

☐ [Federal] I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 27, 2015, at Los Angeles, California.


YOLANDA S. RAMOS