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10 Attorneys for DIAMOND FARMING COMPANY,
11 a California corporation, CRYSTAL ORGANIC
12 FARMS, a limited liability company, GRIMMWAY
13 ENTERPRISES, INC., and LAPIS LAND COMPANY, LLC

14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
15 **IN AND FOR THE COUNTY OF LOS ANGELES**

16 Coordination Proceeding Special Title
17 (Rule 1550 (b))

18 ANTELOPE VALLEY GROUNDWATER
19 CASES

20 Included actions:

21 Los Angeles County Waterworks District No.
22 40 vs. Diamond Farming Company
23 Los Angeles Superior Court
24 Case No. BC 325201

25 Los Angeles County Waterworks District No.
26 40 vs. Diamond Farming Company
27 Kern County Superior Court
28 Case No. S-1500-CV 254348 NFT

Diamond Farming Company vs. City of
Lancaster
Riverside County Superior Court
Lead Case No. RIC 344436 [Consolidated
w/Case Nos. 344668 & 353840]

AND RELATED CROSS-ACTIONS.

Judicial Council Coordination No. 4408

Case No.: 1-05-CV-049053

**DESIGNATION FOR WITNESSES AT
TRIAL AND TIME FOR TRIAL
TESTIMONY BY DIAMOND FARMING
COMPANY, CRYSTAL ORGANIC
FARMS, LLC, GRIMMWAY
ENTERPRISES, INC. AND LAPIS
LAND COMPANY, LLC**

Date: December 15, 2010

Time: 9:00 a.m.

Dept: 1

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1 Diamond Farming Company, Crystal Organic Farms, LLC, Grimmway Enterprises, Inc. and
2 LAPIS Land Company, LLC submit the following information concerning expert witnesses that will be
3 called at time of trial, brief nature of each witnesses' intended testimony, and the time estimated for each
4 expert.

5 **Dr. Steven Bachman**

6 Dr. Bachman will testify on historical changes in storage of groundwater within the Antelope
7 Valley area of adjudication, historical water balances within that area, base periods for calculating the
8 yield of that area, the yield of that area, and the uncertainties in the calculations of the water balance and
9 yield of the area of adjudication. Dr. Bachman was also prepared to testify on the hydrologic connection
10 of the Willow Springs subarea to the main Antelope Valley subarea and the extent to which pumping
11 in the Willow Springs subarea affects groundwater elevations in the main area of adjudication. Pursuant
12 to the court's clarification, that issue will be deferred until a later phase of trial. Additionally, Dr.
13 Bachman may also testify concerning specific issues testified to by other experts designated by other
14 parties, including the assessment and evaluation of the validity of the factual and hypothetical
15 assumptions, data, and conclusions offered by those other experts, as well as the ultimate opinions and
16 evaluations that are based upon that data and/or those assumptions.

17 It is anticipated Dr. Bachman's direct testimony will take one full day.

18 **Dr. Mark Grismer**

19 Dr. Grismer will testify as to the lag time for agricultural irrigation recharge to the water supply.
20 Dr. Grismer may also testify concerning specific issues testified to by other experts designated by other
21 parties, including the assessment and evaluation of the validity of the factual and hypothetical
22 assumptions, data, and conclusions offered by those other experts, as well as the ultimate opinions and
23 evaluations that are based upon that data and/or those assumptions.

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1 It is anticipated that Dr. Grismer's direct testimony will take 2 ½ to 3 hours.

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3 Dated: December 10, 2010

LeBEAU • THELEN, LLP

4
5 By: 

BOB H. JOYCE

6 Attorneys for DIAMOND FARMING COMPANY,
7 a California corporation, CRYSTAL ORGANIC
8 FARMS, a limited liability company, GRIMMWAY
9 ENTERPRISES, INC., and LAPIS LAND
10 COMPANY, LLC
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PROOF OF SERVICE

ANTELOPE VALLEY GROUNDWATER CASES
JUDICIAL COUNCIL PROCEEDING NO. 4408
CASE NO.: 1-05-CV-049053

I am a citizen of the United States and a resident of the county aforesaid; I am over the age of eighteen years and not a party to the within action; my business address is: 5001 E. Commercenter Drive, Suite 300, Bakersfield, California 93309. On December 10, 2010, I served the within

**DESIGNATION FOR WITNESSES AT TRIAL AND TIME FOR TRIAL TESTIMONY BY
DIAMOND FARMING COMPANY, CRYSTAL ORGANIC FARMS, LLC, GRIMMWAY
ENTERPRISES, INC. AND LAPIS LAND COMPANY, LLC**

■ (BY POSTING) I am "readily familiar" with the Court's Clarification Order. Electronic service and electronic posting completed through www.scefiling.org ; All papers filed in Los Angeles County Superior Court and copy sent to trial judge and Chair of Judicial Council.

Los Angeles County Superior Court
111 North Hill Street
Los Angeles, CA 90012
Attn: **Department 1**
(213) 893-1014

Chair, Judicial Council of California
Administrative Office of the Courts
Attn: Appellate & Trial Court Judicial Services
(Civil Case Coordinator)
Carlotta Tillman
455 Golden Gate Avenue
San Francisco, CA 94102-3688
Fax (415) 865-4315

■ (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct, and that the foregoing was executed on December 10, 2010, in Bakersfield, California.


LEQUETTA HANSEN