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Attorney for Antelope Valley Mobile Estates, LLC

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

**ANTELOPE VALLEY
GROUNDWATER CASES**

Included Actions:

Los Angeles County Waterworks District
No. 40 v. Diamond Farming Co.
Los Angeles County Superior Court
Case No. BC 325201

Los Angeles County Waterworks District
No. 40 v. Diamond Farming Co.
Kern County Superior Court
Case No. S-1500-CV-254-348

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

Judicial Council Coordination No. 4408

For filing purposes only:
Santa Clara County Case No. 1-05-CV-049053

Assigned to the Honorable Jack Komar

**ANTELOPE VALLEY MOBILE
ESTATES DISCLOSURE OF
WITNESSES AND EXHIBITS RE:
AUGUST 3, 2015 TRIAL**

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

ANTELOPE VALLEY MOBILE ESTATES, LLC ("AVME") discloses, pursuant to the
Court's Second Amended Case Management Order, the following witnesses and exhibits it intends
to present at the August 3, 2015 trial and prove up of the Stipulation For Entry of Judgment and
Physical Solution:

Witnesses

**AVME'S DISCLOSURE OF WITNESSES AND EXHIBITS
RE: AUGUST 3, 2015 TRIAL AND STIPULATION/PROVE UP**

Wayde Nicholson (Mobilehome Park Manager)

Elizabeth Nicholson (Mobilehome Park Manager)

Al White (former Mobilehome Park Manager)

Daniel Sackett (Groundwater Contaminant Inspector, Skookum H2O Monitoring, Inc.)

Sandra Disco (President, AVME)

Michael Disco (Vice President, AVME)

Scott Kolar (Tax Representative, AVME)

Jeanette Kolar (Secretary, AVME)

AVME declares as witnesses, and reserves the right to call as non retained experts, the following:

Robert G. Beeby (non retained shared expert with the Public Water Suppliers)

Dennis Williams (non retained shared expert with the Public Water Suppliers)

David H. Peterson (non retained shared expert with AVEK and the Overlying Landowners)

Charles W. Binder (non retained shared expert with AVEK and the Overlying Landowners)

Robert Wagner (non retained shared expert with AVEK and the Overlying Landowners)

Timothy Thompson (non retained court appointed expert)

In addition to the witnesses disclosed above, AVME reserves the right to supplement or add to this list as may be necessary or appropriate.

Exhibits

AVME intends to introduce evidence as to its organizational status, land ownership, land use and facilities, groundwater wells and infrastructure, physical connections, overlying ground water pumping rights and usage and approved future usage (including 28 Mobilehome connections, swimming pool, laundry room, landscaping and approvals of additional spaces/future uses), as follows:

<u>Exhibit No.</u>	<u>Description</u>
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AVME-1	Grant Deeds re Property.
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AVME-2	State of California, Annual Permits to Operate Mobilehome Park [28 lots with drains], for all appropriate years.
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1 AVME-3 California Department of Public Health, Small Water System Annual Fees
2 Invoices [28 Service Connections], for all appropriate years.
3 AVME-4 Kern County, Department of Agriculture & Measurement Standards,
4 Commercial Weighing and Measuring Devices, Certificate of Registration,
5 [28 meters], for all appropriate years.
6 AVME-5 California Department of Public Health/Drinking Water Branch, Water
7 Purveying Permit (CA 1500485), for all appropriate years.
8 AVME-6 Kern County, Environmental Health Services Dept., Permits to operate
9 Swimming Pool, for all appropriate years.
10 AVME-7 Kern County Planning and Community Development Department, Approval
11 of Use Expansion, including all supporting documents, for 22 additional
12 recreational vehicle spaces, with all appropriate connections.
13 AVME-8 Articles of Organization and Certificate of Good Standing.
14 AVME-9 Response of AVME re Phase IV Discovery Order.
15 AVME-10 Declaration of Sandra Disco.
16 AVME-11 Declaration of Michael Disco.
17 AVME-12 Pictures: AVME property
18 AVME-13 Pictures: location facilities.

19 In addition to the exhibits disclosed above, AVME reserves the right to supplement or add
20 to this list as may be necessary or appropriate.

21 The above list does not include any witnesses or exhibits to be called for rebuttal or
22 impeachment, in any.

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24 Dated: April 27, 2015

Respectfully submitted,

25 LAW OFFICES OF WALTER J. WILSON

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28 Walter J. Wilson, Attorney for
Antelope Valley Mobile Estates, LLC

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On April 27, 2015, I served the within document(s) in the Antelope Valley Groundwater Adjudication Cases, JCCP No. 4408, described as:

AND EXHIBITS RE: AUGUST 3, 2015 TRIAL

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 Long Beach, California.

Walter J. Wilson