1 2	JANET K. GOLDSMITH, State Bar No. 0655 KRONICK, MOSKOVITZ, TIEDEMANN & A Professional Corporation	959 c GIRARD
3	400 Capitol Mall, 27th Floor Sacramento, CA 95814-4416	
4	Telephone: (916) 321-4500 Facsimile: (916) 321-4555	
5	CARMEN A. TRUTANICH, Los Angeles Ci	
6	RICHARD M. BROWN, General Counsel, W. Power	Vater and Exempt from Filing Fee Pursuant to Government Code Section 6103
7	RAYMOND ILGUNAS, General Counsel, L. World Airports	os Angeles
8	1 World Way, Room 104 Los Angeles, CA 90045-5803	
9	Attorneys for Defendant CITY OF LOS ANO LOS ANGELES WORLD AIRPORTS	SELES and
10	SUPERIOR COURT OF THE STATE OF CALIFORNIA	
11	COUNTY OF LOS ANGELES	
12	0001111	JI EGG TH GEEES
13	Coordination Proceeding	Case No. 105 CV 049053
14	ANTELOPE VALLEY GROUNDWATER CASES	Judicial Council Coordination Proceeding No. 4408
15	Los Angeles County Waterworks District	The Honorable Jack Komar
16	No. 40 v. Diamond Farming Co.	Santa Clara Case No. Case No. 105 CV 049053
17	Los Angeles County Waterworks District No. 40 v. Diamond Farming Co.	CITY OF LOS ANGELES' DEMAND FOR EXCHANGE OF EXPERT WITNESS
18	Wm. Bolthouse Farms, Inc. v. City of	INFORMATION AND FOR PRODUCTION OF EXPERT REPORTS AND WRITINGS
19	Lancaster	Riverside County Superior Court
20	Diamond Farming Co. v. City of Lancaster	Lead Case No. ŘÍC 344436 Case No. ŘÍC 344668
21	Diamond Farming Co. v. Palmdale Water	Case No. RIC 353840 Los Angeles Superior Court
22	District	Case No. BC 325201 Kern County Superior Court
23		Case No. S-1500-CV-254348
24		Date: December 27, 2012 Time: 11.00 a.m.
25		Place: 400 Capitol Mall, 27 th floor Sacramento, CA 95814
26		
27		
28		

1	The City of Los Angeles hereby demands under Code of Civil Procedure section 2034.2	
2	that all other parties to this action exchange:	
3	(1) A list containing the name and address of each person whose expert	
4	opinion testimony that party expects to offer at trial, whether orally or by deposition testimony	
5	pursuant to Code of Civil Procedure section 2034.21(a); and	
6	(2) An expert witness declaration for each such person pursuant to Code of	
7	Civil Procedure section 2034.210(b).	
8	DEMAND IS ALSO MADE for the production for inspection and copying of all	
9	discoverable reports and writings, if any, made by each expert listed in the course of preparing	
10	that expert's opinion. (Code Civ. Proc., § 2034.210(c).) The time and date for the exchange of	
11	information and production of reports shall be 11:00 a.m. on December 27, 2012. The place for	
12	the exchange and production shall be Kronick, Moskovitz, Tiedemann & Girard, 400 Capitol	
13	Mall, 27 th floor, Sacramento, CA 95814.	
14	Dated: December 3, 2012	
15 16	CARMEN A. TRUTANICH, City Attorney Richard M. Brown, General Counsel, Water and Power Raymond Ilgunas, General Counsel, Los Angeles World	
17	Airports	
18	KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD A Professional Corporation	
19		
20	By Janet K. Goldsmith	
21	Attorneys for Defendant CITY OF LOS ANGELES and LOS ANGELES WORLD AIRPORTS	
22	and LOS ANGELES WORLD AIRI ORTS	
23		
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PROOF OF SERVICE

I DECLARE THAT:

I am employed in the County of Sacramento, State of California. I am over the age of eighteen years and not a party to the within action. My business address is 400 Capitol Mall, 27th Floor, Sacramento, California 95814.

On December 3, 2012, I served the attached CITY OF LOS ANGELES' DEMAND

FOR EXCHANGE OF EXPERT WITNESS INFORMATION AND FOR PRODUCTION

OF EXPERT REPORTS AND WRITINGS by posting the document to the Santa Clara

Superior Court website www.scefiling.org. in regard to the Antelope Valley Groundwater matter.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct and that this document was executed on December 3, 2012.

Lorraine Lippolis

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1016107.1

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