

1 JANET K. GOLDSMITH, State Bar No. 065959

jgoldsmith@kmtg.com

2 KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD

A Professional Corporation

3 400 Capitol Mall, 27th Floor

Sacramento, California 95814

4 Telephone: (916) 321-4500

Facsimile: (916) 321-4555

5 MICHAEL N. FEUER, State Bar No. 111529

6 Los Angeles City Attorney

RICHARD M. BROWN, General Counsel, Water and Power

7 RAYMOND ILGUNAS, General Counsel, Los Angeles World Airports

Attorneys for Defendant CITY OF LOS ANGELES and

8 LOS ANGELES WORLD AIRPORTS

9 Attorneys for Cross-Defendants City of Los

Angeles and Los Angeles World Airports

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

11 **COUNTY OF LOS ANGELES**

12
13 Coordination Proceeding

14 ANTELOPE VALLEY GROUNDWATER
15 CASES,

16 Los Angeles County Waterworks District No.
40 v. Diamond Farming Co.

17 Los Angeles County Waterworks District No.
18 40 v. Diamond Farming Co.

19 Wm Bolthouse Farms, Inc. v. City of
20 Lancaster

21 Diamond Farming Co. v. City of Lancaster

22 Diamond Farming Co. v. Palmdale Water
District,

23 AND RELATED ACTIONS
24
25
26
27
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Case No. 105 CV 049053

Judicial Council Coordination
Proceeding No. 4408

**CROSS-DEFENDANT CITY OF LOS
ANGELES' DISCLOSURE OF
WITNESSES AND EXHIBITS
REGARDING THE PROVE-UP OF THE
STIPULATED JUDGMENT AND
PHYSICAL SOLUTION**

Judge: Hon. Jack Komar

Date: August 3, 2015

Time: TBD

Dept.: TBD

The Hon. Jack Komar
Santa Clara Case No. 105 CV 049053

Riverside County Superior Court

Lead Case No. RIC 344436

Case No. RIC 344668

Case No. RIC 353840

Los Angeles Superior Court Case

No. BC 325201

Kern County Superior Court Case

No. S-1500-CV-254348

1 TO ALL PARTIES AND TO ALL PARTIES' ATTORNEYS OF RECORD:

2 Cross-defendant City of Los Angeles, by and through its Department of Airports, Los
3 Angeles World Airports ("LAWA") hereby designates the following witnesses and exhibits, to the
4 extent such are needed, during the Phase 5 trial beginning in August, 2015, to prove ownership of
5 lands, beneficial use of water, and reasonableness of water use on LAWA lands:

6 **Witnesses:**

7 1. Vivian Howell, LAWA's Manager of Commercial Development Real Estate and Property
8 Management—LAX Non-Airfield and Palmdale. Ms. Howell will testify, if necessary, to
9 LAWA's ownership of lands within the Adjudication Area. Ms. Howell's testimony and
10 supporting exhibits (listed below as Exhibits 5-LosAngeles-1 through 5-LosAngeles-15) were
11 previously submitted in the Phase 4 trial as Exhibit 4-LosAngeles-2 and can be found on the case
12 website as Document #5960.

13 2. Robert C. Wagner, LAWA's previously designated expert (Document No. 5664), if
14 necessary, to identify LAWA lands, wells, and water use from 2000-2004, 2011 and 2012. With
15 the exception of 5-LosAngeles-30, Mr. Wagner's testimony and exhibits were previously
16 submitted together in the Phase 4 trial as Exhibit 4-LosAngeles-1 (see Document No. 6901). If
17 necessary, Mr. Wagner will also testify as to the value and feasibility of the proposed Stipulated
18 Judgment and Physical Solution;

19 3. Carl Voss, Jr., custodian of records, regarding the methods of collecting and recording
20 extraction information for various leaseholds on LAWA property;

21 3. Robert Beeby; non-retained, shared expert designated by Public Water Suppliers to testify
22 as to the reasonableness of water use by Stipulating Parties and the fairness of the proposed
23 Stipulated Judgment and Physical Solution;

24 4. David H. Peterson, non-retained, shared expert designated by Antelope Valley-East Kern
25 Water Agency ("AVEK") to testify as to the reasonableness of water use by Stipulating Parties;
26 and

27 5. Dennis Williams, non-retained, shared expert designated by Public Water Suppliers to
28 testify as to the value and feasibility of the proposed Stipulated Judgment and Physical Solution.

Exhibits:

1. 5-LosAngeles-1: List of parcels by Assessor Identification Numbers ("AIN") owned by LAWA;
2. 5-LosAngeles-2: List of 15 parcels acquired by LAWA between 2004-2009;
3. 5-LosAngeles-3: Page 7 of 66 of Parcel Map 24419 and Record of Survey of LAWA lands.
4. 5-LosAngeles-4: List of LAWA lessees;
5. 5-LosAngeles-5: Lease agreement between LAWA and Wheeler-Williams Farms covering approximately 150 acres;
6. 5-LosAngeles-6: Lease agreement between LAWA and Wheeler-Williams Farms covering approximately 224 Acres;
7. 5-LosAngeles-7: Lease agreement between LAWA and Diamond Farming Company;
8. 5-LosAngeles-8: Lease agreement between LAWA and E-Z Care Growers, Inc. covering approximately 80 acres;
9. 5-LosAngeles-9: Lease Agreement between LAWA and Los Angeles County Sanitation District No. 20 for 2,680 acres;
10. 5-LosAngeles-10: Consent to Sublease between Los Angeles County Sanitation District No. 20 and Antelope Valley Farming LLC for 320 acres;
11. 5-LosAngeles-11: Amendment to Sublease Agreement between Los Angeles County Sanitation District No. 20 and Antelope Farming LLC;
12. 5-LosAngeles-12: Sublease Agreement between Los Angeles County Sanitation District No. 20 and Harrington Farms for 23 acres;
13. 5-LosAngeles-13: Lease agreement between LAWA and Rockwell International Corporation;
14. 5-LosAngeles-14: Lease agreement between LAWA and Boing North American, Inc.;
15. 5-LosAngeles-15: Lease Agreement between LAWA and Christina McEnaney, for 50 acres for Palmdale Golf Course;
16. 5-LosAngeles-16: Professional Resume of Robert C. Wagner

1 17. 5-LosAngeles-17: Table of Assessor's Identification Numbered Parcels and associated
2 acreage for LAWA lands.

3 18. 5-LosAngeles-18: Declaration of Carl Voss, Jr., custodian of records for certain
4 LAWA lands leased by Grimmway Enterprises.

5 19. 5-LosAngeles-19: Meter readings for groundwater extractions on LAWA land farmed
6 by certain Lessees.

7 20. 5-LosAngeles-20: Declaration of Rick Moss, custodian of records for LAWA lands
8 leased by AG Sod Farms and records of groundwater extractions.

9 21. 5-LosAngeles-20: Groundwater extractions of AG Sod Farms, 2011 and 2012.

10 22. 5-LosAngeles-22: Pump tests for wells operated by AG Sod Farms, Inc. on LAWA
11 lands.

12 23. 5-LosAngeles-23: Table of Groundwater extraction by AG Sod Farms based on Pump
13 Tests and Diesel Records.

14 24. 5-LosAngeles-24: Table of Applied Crop Water Duties and Irrigation Efficiency
15 Values from Appendix D-3, Table 4, Summary Expert Report

16 25. 5-LosAngeles-25: Groundwater Production and Effluent Reuse by Field, 2000-2004
17 and 2011 and 2012.

18 26. 5-LosAngeles-26: Aerial Photographs of LAWA lands for various years from 2002
19 through 2012.

20 27. 5-LosAngeles-27: Tables showing Irrigation by Assessor Identification Number, crop,
21 and irrigated acreage, 2000-2004, 2011-2012.

22 28. 5-LosAngeles-28: Table showing effluent reuse for irrigation, 2000-2004, 2011-2012.

23 29. 5-LosAngeles-29: Certified records of Groundwater Extraction and Diversion filed
24 with the State Water Resources Control Board.

25 30. 5-LosAngeles-30: Map of LAWA lands, showing AIN parcels and wells.

26 LAWA believes this statement fairly discloses the witnesses and exhibits it will rely upon for the
27 trial scheduled to commence in August, 2015. LAWA reserves the right to amend this disclosure
28 statement as appropriate and based upon discovery of additional evidence. LAWA further

1 reserves the right to call additional witnesses and submit additional exhibits as necessary in
2 rebuttal to testimony and exhibits of other parties.

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4 Dated: April 27, 2015.

KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD
A Professional Corporation

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6
7 By:


Janet K. Goldsmith

8 Attorneys for Cross-Defendants
9 City of Los Angeles and Los Angeles World
10 Airports
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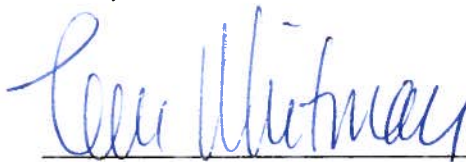
1 **PROOF OF SERVICE**

2 I, Terri Whitman, declare:

3 I am a citizen of the United States and employed in Sacramento County, California. I am
4 over the age of eighteen years and not a party to the within-entitled action. My business address is
5 400 Capitol Mall, 27th Floor, Sacramento, California 95814. On April 27, 2015, I served a copy
6 of the within document: **CROSS-DEFENDANT CITY OF LOS ANGELES' DISCLOSURE**
7 **OF WITNESSES AND EXHIBITS REGARDING THE PROVE-UP OF THE**
8 **STIPULATED JUDGMENT AND PHYSICAL SOLUTION** via electronic posting to the Santa
9 Clara Superior Court E-Filing website, <http://www.scefiling.org/cases/casehome.jsp?caseId=19> .”

10 I declare under penalty of perjury under the laws of the State of California that the above is
11 true and correct.

12 Executed on April 27, 2015 at Sacramento, California.

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16 Terri Whitman
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