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EXEMPT FROM FILING FEES UNDER  
GOVERNMENT CODE SECTION 6103

7 Attorneys for Federal Defendants

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**COUNTY OF LOS ANGELES**

9 Coordination Proceeding  
10 Special Title (Rule 1550(b))

) Judicial Council Coordination  
) Proceeding No. 4408

11 ANTELOPE VALLEY GROUNDWATER CASES

12 Included actions:

) **EXPERT WITNESS**  
) **DECLARATION**

13 Los Angeles County Waterworks District No. 40 v.  
Diamond Farming Co., et al.

14 Los Angeles County Superior Court, Case No. BC 325  
201

15 Los Angeles County Waterworks District No. 40 v.  
Diamond Farming Co., et al.

16 Kern County Superior Court, Case No. S-1500-CV-  
17 254-348

18 Wm. Bolthouse Farms, Inc. v. City of Lancaster

Diamond Farming Co. v. City of Lancaster

19 Diamond Farming Co. v. Palmdale Water District

Riverside County Superior Court, Consolidated Action,  
20 Case nos. RIC 353 840, RIC 344 436, RIC 344 668

21 AND RELATED CROSS ACTIONS  
22 \_\_\_\_\_  
23

24 Pursuant to California *Code of Civil Procedure* § 2034.260, Cross-Defendant, United  
25 States of America, hereby designates Dr. June Oberdorfer as an expert witness who may be  
26 called to testify at the time of the Phase 2 Trial or related hearings. The United States reserves  
27 the right to supplement this witness list and designate additional witnesses including expert  
28 witnesses for use in rebuttal. The United States further reserves the right to call as an witness at

1 trial an expert not previously designated for impeachment purposes pursuant to *Code of Civil*  
2 *Procedure* § 2034.310.

3 The United States further declares that:

4 1. Dr. Oberdorfer is a Professional Geologist and Certified Hydrogeologist in the State of  
5 California. She has a Doctor of Philosophy degree in Geology and Geophysics, with an emphasis  
6 in hydrogeology, from the University of Hawaii. She has conducted groundwater investigations  
7 for over 29 years. Dr. Oberdorfer is a Professor in the Department of Geology at San Jose State  
8 University and acts as a consultant on groundwater related issues. In the present case, her role is  
9 a consultant to Earth Tech, Inc. She has conducted groundwater investigations in California  
10 since 1984, including investigations in groundwater basin characterization, water supply, and  
11 groundwater contamination. This work has included several investigations in the North Muroc  
12 area of the Antelope Valley groundwater basin. A copy of her resume is attached to this  
13 declaration as Exhibit A.

14 2. Dr. Oberdorfer has been asked to provide testimony for the upcoming Phase II trial on the  
15 issue of basin characteristics and the existence of hydraulically isolated subbasins. In general,  
16 the substance of her expert opinion testimony is that the Antelope Valley groundwater  
17 adjudication area consists of a single hydrogeologic groundwater basin. She will show that while  
18 faults and other features have been used in the past to subdivide the Antelope Valley  
19 groundwater basin into geologic subunits, these subunits are hydraulically interconnected, with  
20 no area being hydraulically isolated from the others. She will further testify that regional ground  
21 water flow models developed for the Antelope Valley show groundwater flow to occur between  
22 subunits, with flow moving from recharge areas to discharge areas.

23 3. Dr. Oberdorfer has agreed to testify at the Phase II trial.

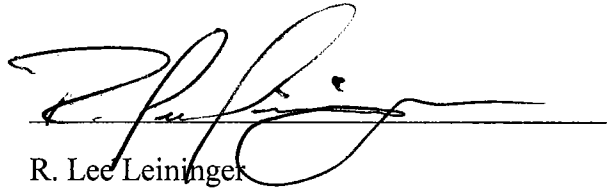
24 4. Dr. Oberdorfer is sufficiently familiar with this pending action to submit to a meaningful oral  
25 deposition concerning the specific testimony, including her opinion and its basis.

26 5. Dr. Oberdorfer's rate is \$ 214.50 per hour for testifying at depositions, mediations,  
27 arbitrations, trial, and for travel time; plus all out-of-pocket expenses, including, but not limited  
28 to, hotel, airfare, car rental, copying, postage, shipping, telephone calls, etc.

1  
2 6. As required by the May 27, 2008 Order After Case Management Conference, as modified by  
3 the Minute Order from June 25, 2008, Dr. Oberdorfer's expert disclosure report is attached to  
4 this declaration as Exhibit B. It contains a summary of her opinions and conclusions and is based  
5 on her personal knowledge and review of available technical information.

6 I declare under the penalty of perjury, the above statements are true and correct.

7 Dated this 15th day of August, 2006.

8  
9  
10   
11 R. Lee Leininger

## **PROOF OF SERVICE**

I, Linda C. Shumard, declare:

I am a resident of the State of Colorado and over the age of 18 years, and not a party to the within action. My business address is U.S. Department of Justice, Environmental and Natural Resources Section, 1961 Stout Street, 8<sup>th</sup> Floor, Denver, Colorado 80294.

On August 15, 2008, I caused the foregoing documents described as **EXPERT WITNESS DECLARATION**, to be served on the parties via the following service:

☒

BY ELECTRONIC SERVICE AS FOLLOWS by posting the documents(s) listed above to the Santa Clara website in regard to the Antelope Valley Groundwater matter.

☐

BY MAIL AS FOLLOWS (to parties so indicated on attached service list): By placing true copies thereof enclosed in sealed envelopes addressed as indicated on the attached service list.

☐

BY OVERNIGHT COURIER: I caused the above-referenced document(s) be delivered to FEDERAL EXPRESS for delivery to the above address(es).

Executed on August 15, 2008, at Denver, Colorado.

/s/Linda C. Shumard  
Linda C. Shumard  
Legal Support Assistant