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EXEMPT FROM FILING FEES UNDER GOVERNMENT CODE SECTION 6103

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

Coordination Proceeding Special Title (Rule 1550(b)) ANTELOPE VALLEY GROUNDWATER CASES Included actions: Los Angeles County Waterworks District No. 40 v. Diamond Farming Co., et al. Los Angeles County Superior Court, Case No. BC 325 201 Los Angeles County Waterworks District No. 40 v. Diamond Farming Co., et al. 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 District Riverside County Superior Court, Consolidated Action, Case nos. RIC 353 840, RIC 344 436, RIC 344 668 AND RELATED CROSS ACTIONS	Judicial Council Coordination Proceeding No. 4408 **EXPERT WITNESS LIST AND EXHIBIT LIST FOR PHASE 2 TRIAL**

I. WITNESS LIST

Cross-Defendant United States hereby designates the following expert witnesses who may be called to testify at the time of the Phase 2 Trial or related hearings.

A. Dr. June Oberdorfer

B. Dr. Jason Sun

The estimated length of time of the direct testimony by Dr. Oberdorfer is two hours. Dr. Oberdorfer will testify that the Antelope Valley Groundwater Basin is a single hydrologic basin and may testify in rebuttal regarding sub-basin divisions. Dr. Sun may testify in rebuttal regarding predicted groundwater responses based on use of the U.S. Geologic Survey computer model (Leighton and Phillips, 2003).

II. EXHIBIT LIST

Cross-Defendant United States hereby designates the following list as exhibits for the purpose of the Phase 2 Trial.

Exhibit 1: map of subunits (alluvium) and groundwater areas (bedrock) for the AVEK area (Antelope and Fremont valleys), Bloyd (1967)

Exhibit 2: map showing subunit boundaries in the west

Exhibit 3: map showing subunit boundaries in the southeast

Exhibit 4: map showing subunit boundaries in the north

Exhibit 5: diagram of faults and bedrock ridges as partial impediments to flow

Exhibit 6: USGS conceptual model of groundwater prior to mid-1990s, Londquist et al. (1993)

Exhibit 7: USGS conceptual model of groundwater after mid-1990s, Leighton and Phillips (2003)

Exhibit 8: diagram showing water mass balance

Exhibit 9: diagram showing pre-development mass balance

Exhibit 10: map of 1915 groundwater elevation contours, principal aquifer

Exhibit 11: map of 1915 groundwater elevation contours, Durbin (1978)

Exhibit 12: diagram showing mass balance after extensive groundwater development

Exhibit 13: map of 1961 groundwater elevation contours, principal aquifer

Exhibit 14: map of 1961 groundwater elevation contours, deep aquifer, Durbin (1978)

Exhibit 15: map of 1966 groundwater elevation contours, Carlson et al. (1998)

Exhibit 16: plate with transmissivity values for principal aquiver, Durbin (1978)

Exhibit 17: map showing nine "partial barriers" (HFBs), Leighton and Phillips (2003)

Exhibit 18: map showing geographic distribution of natural groundwater recharge and discharge, Durbin (1978)

Exhibit 19: map showing relative geographic distribution of pumpage from the principal and deep aquifers used in the mathematical model for 1915 through 1961, Durbin (1978)

Exhibit 20: map showing natural recharge, Leighton and Phillips (2003)

Exhibit 21: map showing natural discharge, Leighton and Phillips (2003)

Exhibit 22: map showing distribution of pumping in 1956, Leighton and Phillips (2003)

Exhibit 23: map showing distribution of pumping in 1995, Leighton and Phillips (2003)

Exhibit 24: figure 1: the hydrograph at Well 8N/17W-1N1 from transient simulations

Exhibit 25: figure 2: the hydrograph at Well 8N/14W-23G1 from transient simulations

Exhibit 26: figure 3: the hydrograph at Well 9N/14W-20B1 from transient simulations

Exhibit 27: figure 4: groundwater level decline in layer 1 after 81 years with 3,000 af/yr pumpage added to the model

Exhibit 28: figure 5: groundwater level decline in layer 2 after 81 years with 3,000 af/yr pumpage added to the model

Exhibit 29: figure 6: groundwater level decline in layer 3 after 81 years with 3,000 af/yr pumpage added to the model

Exhibit 30: figure 7: groundwater level decline in layer 1 after 100 years with 3,000 af/yr pumpage added to the model

Exhibit 31: figure 8: groundwater level decline in layer 2 after 100 years with 3,000 af/yr pumpage added to the model

Exhibit 32: figure 9: groundwater level decline in layer 3 after 100 years with 3,000 af/yr pumpage added to the model

Exhibit 33: figure 10: groundwater level decline in layer 1 after 200 years with 3,000 af/yr pumpage added to the model

Exhibit 34: figure 11: groundwater level decline in layer 2 after 200 years with 3,000 af/yr pumpage added to the model

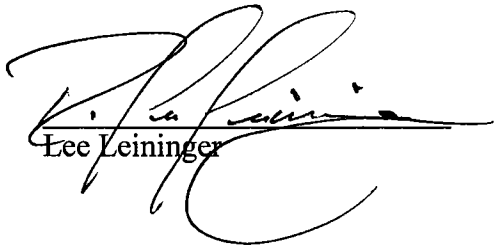
Exhibit 35: figure 12: groundwater level decline in layer 3 after 200 years with 3,000 af/yr pumpage added to the model

Exhibit 36: figure 13: the annual net groundwater underflow from Western Antelope Valley to the Lancaster sub-unit over a 1,000-year simulation period

Exhibit 37: figure 14: groundwater level decline in layer 1 after 81 years with stresses east of Neenach Fault

Exhibit 38: figure 15: groundwater level decline in layer 1 after 81 years with stresses west of Neenach Fault

Dated October 29, 2008.



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, 8th Floor, Denver, Colorado 80294.

On September 29, 2008, I caused the foregoing documents described as**; EXPERT WITNESS LIST AND EXHIBIT LIST FOR PHASE 2 TRIAL**, to be served on the parties via the following service:

[X] 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 September 29, 2008, at Denver, Colorado.

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