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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**

9 **COUNTY OF LOS ANGELES**

10 Coordination Proceeding	)	Judicial Council Coordination
11 Special Title (Rule 1550(b))	)	Proceeding No. 4408
12 ANTELOPE VALLEY GROUNDWATER CASES	)	
13 Included actions:	)	UNITED STATES' PRE-TRIAL
Los Angeles County Waterworks District No. 40 v.	)	STATEMENT IDENTIFYING
14 Diamond Farming Co., et al.	)	EXPERT WITNESS AND
Superior Court of California, County of Los Angeles,	)	SUMMARIZING TESTIMONY
15 Case No. BC 325 201	)	
Los Angeles County Waterworks District No. 40 v.	)	
16 Diamond Farming Co., et al.	)	
Superior Court of California, County of Kern, Case	)	
17 No. S-1500-CV-254-348	)	
Wm. Bolthouse Farms, Inc. v. City of Lancaster	)	
18 Diamond Farming Co. v. City of Lancaster	)	
Diamond Farming Co. v. Palmdale Water Dist.	)	
19 Superior Court of California, County of Riverside,	)	
consolidated actions, Case nos. RIC 353 840, RIC	)	
20 344 436, RIC 344 668	)	

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22 Pursuant to the Court's November 18, 2010 Order directing counsel to submit pretrial  
23 statements, Cross-Defendant United States hereby provides the following information:

24 **1. Identity of each witness intended to be called to testify:**

25 Dr. June Oberdorfer

26 **2. Summary of each witness' testimony:**

27 Dr. Oberdorfer will proffer her opinion on the safe yield of the Antelope Valley  
28 Groundwater Basin and whether the basin is in overdraft based upon the available physical  
evidence and the opinions expressed by other testifying experts, including the data, assumptions,

1 and conclusions reached and the validity of the methodologies used.

2 **3. Estimated length of time of each witness' direct testimony:**

3 Dr. Oberdorfer's direct testimony is expected to take approximately three hours.

4 Respectfully submitted this 14<sup>th</sup> day of December, 2010.

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7 /s/ R. Lee Leininger  
8 R. LEE LEININGER  
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## **PROOF OF SERVICE**

I, Karmen Robinson, 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, Environment and Natural Resources Section, 999 18th Street, South Terrace - Suite 370, Denver, Colorado 80202.

On December 14, 2010, I caused the foregoing document(s) described as: **UNITED STATES' PRE-TRIAL STATEMENT IDENTIFYING EXPERT WITNESS AND SUMMARIZING TESTIMONY**, to be served on the parties via the following service:

☒

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

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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 December 14, 2010, at Denver, Colorado.

/s/ Karmen Robinson  
Karmen Robinson  
Paralegal Specialist