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EXEMPT FROM FILING FEES UNDER
GOVERNMENT CODE SECTION 6103

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7 Attorneys for Federal Defendants

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

9 **COUNTY OF LOS ANGELES**

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

) Judicial Council Coordination
) Proceeding No. 4408

11 ANTELOPE VALLEY GROUNDWATER CASES

) UNITED STATES' PRE-TRIAL
) STATEMENT IDENTIFYING
) WITNESSES AND
) SUMMARIZING TESTIMONY

12 Included actions:

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

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

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

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

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

Diamond Farming Co. v. City of Lancaster

18 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

21 Pursuant to the Court's July 11, 2006 Order Directing Counsel to Submit Additional
22 Information, Defendant United States hereby provides the following information:

23 1. Identity of each witness intended to be called to testify;

24 Mr. Ric Williams

25 Dr. June Oberdorfer

26 2. Summary of each witness' testimony;

27 Mr. Williams is a specialist in computerized map-making and the use of Global
28 Information System (GIS) databases. He will testify to his use of a GIS database and other

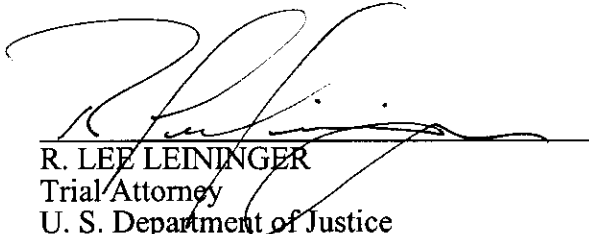
1 sources to create the map included as Attachment 1 to his Declaration filed on June 29, 2006. In
2 particular, Mr. Williams will provide testimony on the use of elevation data to locate the
3 boundary of the Antelope Valley watershed.

4 Dr. Oberdorfer will testify on the location of the Antelope Valley Groundwater Basin
5 demarcated on the map, Attachment 1 to Mr. Williams' declaration. In addition, she will provide
6 testimony regarding surface water recharge to the Antelope Valley Groundwater Basin aquifer(s)
7 Furthermore, she will provide testimony regarding groundwater recharge to the Antelope Valley
8 Groundwater Basin in the vicinity of the Willow Springs fault and the Los Angeles - San
9 Bernardino County line in the southeast area of the Antelope Valley.

10 3. Estimated length of time of each witness' direct testimony;

11 The estimate for Mr. Williams' direct testimony is 45 minutes. Dr. Oberdorfer's direct
12 testimony is expected to take one hour. Total time, approximately 2 hours.

13 Respectfully submitted this 13th day of July, 2006.

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17 R. LEE LEININGER
18 Trial Attorney
19 U. S. Department of Justice
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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 July 13, 2006, I caused the foregoing documents described as UNITED STATES' PRE-TRIAL STATEMENT IDENTIFYING WITNESSES AND SUMMARIZING TESTIMONY, 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.

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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.

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

Executed on July 13, 2006, at Denver, Colorado.

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