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2 Environment & Natural Resources Division

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12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
13 **COUNTY OF LOS ANGELES**

14	Coordination Proceeding	Judicial Council Coordination
15	Special Title (Rule 1550 (b)),	Proceeding No. 4408
16		[Assigned to the Honorable Jack Komar,
17		Judge Santa Clara County Superior Court,
18	ANTELOPE VALLEY GROUNDWATER	Dept. 17]
19	CASES	Santa Clara Court Case No. 1-05-CV-049053
20		
21		SUPPLEMENTAL EXPERT WITNESS
22		DESIGNATIONS AND DECLARATIONS
23		
24		

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26 Pursuant to the December 11, 2012, *Case Management Order for Phase 4 Trial*, Cross-
27 Defendant, United States of America, hereby designates the following expert witnesses who may
28 be called to testify at the time of the Phase IV Trial or related hearings and provides declarations

1 pursuant to the *California Code of Civil Procedure* § 2034.260. The United States reserves the
2 right to supplement this witness list and designate additional witnesses including expert
3 witnesses for use in rebuttal. The United States further reserves the right to call as a witness at
4 trial an expert not previously designated for impeachment purposes pursuant to *Code of Civil*
5 *Procedure* § 2034.310.
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7 The United States hereby declares and designates as expert witness:

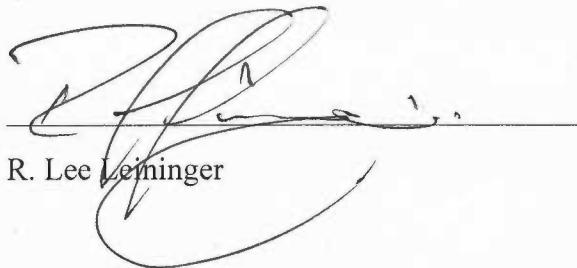
8 1. **Dr. Richard P. Hallion.**

- 9 a. **Qualifications.** Dr Hallion was Curator of Science and Technology, and
10 subsequently Curator of Space Science, National Air and Space Museum,
11 Smithsonian Institution, 1974-1980. He was NASA Contract Historian for the
12 NASA Dryden Research Center at Edwards AFB, 1980-82. He was Air Force
13 Flight Test Center Chief Historian, Edwards AFB, 1982-1986. He was The Air
14 Force Historian, Headquarters United States Air Force, Pentagon, Washington,
15 D.C., 1991-2002. His additional qualifications are summarized in his biography
16 attached as Exhibit D.
17
18 b. **Substance of testimony.** Dr Hallion has been asked to testify at the upcoming
19 Phase IV trial on the history of Edwards AFB and AFP 42.
20
21 c. **Agreement to testify.** Dr Hallion has agreed to testify at the Phase IV trial.
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23 d. **Familiarity with action.** Dr Hallion is sufficiently familiar with this pending
24 action to submit to a meaningful oral deposition concerning the specific
25 testimony, including his opinion and its basis.
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27 e. **Deposition availability.** Dr Hallion is available for deposition on the dates
28 shown on the calendar attached as Exhibit C.

1 f. **Rates.** Dr Hallion, who lives in Shalimar, Florida, has an hourly rate for his time
2 to testify at deposition and for travel time set at \$125.00. In addition, any party
3 requesting his deposition will need to reimburse all of his out-of-pocket expenses,
4 including appropriate hotel, airfare, car rental, copying, postage, shipping and
5 telephone calls.
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8 I declare under the penalty of perjury, the above statements are true and correct.
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10 Dated this 11th day of January 2013.

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13 R. Lee Leininger
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