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EXEMPT FROM FILING FEES
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§6103

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15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
16 **COUNTY OF LOS ANGELES**
17

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

22 This pleading amends the supplemental expert witness designation and declaration filed
23 by the United States on this day. Included in paragraph 1.e., below, is the date of Dr. Hallion's
24 U.S. Phase 4 Trial Expert Designations and Declarations

1 deposition as agreed among the parties, and this amendment includes as an attachment Dr.
2 Hallion's Curriculum Vitae which was inadvertently omitted from the earlier filing.

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4 Pursuant to the December 11, 2012, *Case Management Order for Phase 4 Trial*, Cross-
5 Defendant, United States of America, hereby designates the following expert witnesses who may
6 be called to testify at the time of the Phase IV Trial or related hearings and provides declarations
7 pursuant to the *California Code of Civil Procedure* § 2034.260. The United States reserves the
8 right to supplement this witness list and designate additional witnesses including expert
9 witnesses for use in rebuttal. The United States further reserves the right to call as a witness at
10 trial an expert not previously designated for impeachment purposes pursuant to *Code of Civil*
11 *Procedure* § 2034.310.
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14 The United States hereby declares and designates as expert witness:

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16 1. **Dr. Richard P. Hallion.**

17 a. **Qualifications.** Dr Hallion was Curator of Science and Technology, and
18 subsequently Curator of Space Science, National Air and Space Museum,
19 Smithsonian Institution, 1974-1980. He was NASA Contract Historian for the
20 NASA Dryden Research Center at Edwards AFB, 1980-82. He was Air Force
21 Flight Test Center Chief Historian, Edwards AFB, 1982-1986. He was The Air
22 Force Historian, Headquarters United States Air Force, Pentagon, Washington,
23 D.C., 1991-2002. His additional qualifications are summarized in his biography
24 attached as Exhibit A.
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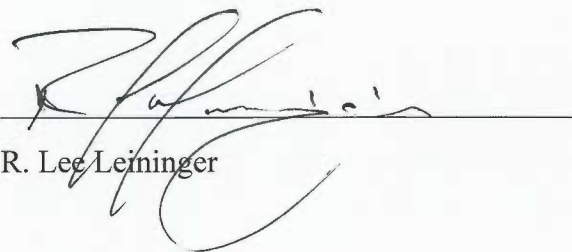
26 b. **Substance of testimony.** Dr Hallion has been asked to testify at the upcoming
27 Phase IV trial on the history of Edwards AFB and AFP 42.
28

- 1 c. **Agreement to testify.** Dr Hallion has agreed to testify at the Phase IV trial.
- 2 d. **Familiarity with action.** Dr Hallion is sufficiently familiar with this pending
- 3 action to submit to a meaningful oral deposition concerning the specific
- 4 testimony, including his opinion and its basis.
- 5
- 6 e. **Deposition availability.** At the January 7, 2013 meet and confer teleconference
- 7 of all parties, Dr Hallion's deposition was scheduled for January 29, 2013 at 1:00
- 8 at the Veritext offices in downtown Los Angeles.
- 9
- 10 f. **Rates.** Dr Hallion, who lives in Shalimar, Florida, has an hourly rate for his time
- 11 to testify at deposition and for travel time set at \$125.00. In addition, any party
- 12 requesting his deposition will need to reimburse all of his out-of-pocket expenses,
- 13 including appropriate hotel, airfare, car rental, copying, postage, shipping and
- 14 telephone calls.
- 15
- 16

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

18 Dated this 11th day of January 2013.

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21 R. Lee Leiminger

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