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4 Attorney for Defendants/Cross-Complaints  
5 CALIFORNIA WATER SERVICE COMPANY SUCCESSOR TO  
ANTELOPE VALLEY WATER COMPANY

6  
7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

8 **IN AND FOR THE COUNTY OF LOS ANGELES**

9 Coordination Proceeding Special Title ) **JUDICIAL COUNCIL COORDINATION**  
(Rule 1550 (b)) ) **PROCEEDING NO. 4408**  
10 ANTELOPE VALLEY GROUNDWATER CASES )  
11 Included Actions: ) Santa Clara Case No. 01-05-CV-049053  
Assigned to the Honorable Jack Komar  
12 Los Angeles County Waterworks Company )  
No. 40 vs. Diamond Farming Company ) **NOTICE OF EXPERT WITNESS DEPOSITIONS**  
13 Los Angeles Superior Court ) **AND REQUEST FOR PRODUCTION OF**  
Case No. BC 325201 ) **DOCUMENTS**  
14 Los Angeles County Waterworks Company )  
No. 40 vs. Diamond Farming Company ) Date: September 29, 2008  
15 Kern County Superior Court ) Time: 9:00 a.m.  
Case No. S-1500-CV 254348 NFT ) Place: The Office of Kronick,  
16 Diamond Farming Company, and W.M. ) Moskowitz, Tiedmann, & Gerard  
17 Bolthouse Farms, Inc., vs. City of ) 400 Capital Mall, 27<sup>th</sup> Floor  
Lancaster ) Sacramento, California 95814  
18 Riverside County Superior Court )  
Lead Case No. RIC 344436 )  
19 [Consolidated w/Case Nos. 344668 & ) Phase 2 Trial Date: October 6, 2008  
353840] )

20  
21 NOTICE IS HEREBY GIVEN as follows:

22 **I. NOTICE OF DEPOSITION**

23 CALIFORNIA WATER SERVICE COMPANY, successor-in-interest to Antelope  
24 Valley Water Company, (the "NOTICING PARTY") will take the deposition of the  
25 following expert witness (the "DEPONENT"), Mr. John Lambie, at the office of

1 Kronick, Moskowitz, Tiedmann & Gerrard, 400 Capital Mall, 27<sup>th</sup> Floor,  
2 Sacramento, California 95814 on September 30, 2008, at 9:00 a.m., and will  
3 continue from day-to-day thereafter, weekends and holidays.

4 **II. REQUEST FOR PRODUCTION**

5 **A. DEFINITIONS**

6 The following words and phrases shall govern the construction of this  
7 document unless the context otherwise requires:

- 8 1. "NOTICING PARTY" or "Cal Water" means California Water Service  
9 Company  
10 2. "DEPONENT" or "YOU" or "YOUR" means the deponent as set forth in the  
11 notice.  
12 3. "DOCUMENT" means "writing" as defined by Evidence Code section 250  
13 and includes drafts, originals and duplicates of written, graphic,  
14 computer or otherwise recorded matters, whether stored in written,  
15 electronic, magnetic or photographic format or by any other means.  
16

17 **B. DOCUMENTS AND THINGS TO BE PRODUCED**

18 The DEPONENT is required to produce, at the date, time and location so  
19 noticed, all DOCUMENTS described below. This demand relates not only to all  
20 DOCUMENTS under the DEPONENT's possession, custody or control, but also those  
21 DOCUMENTS reasonably available to the DEPONENT

- 22 1. All DOCUMENTS received, reviewed or relied upon by the DEPONENT in  
23 preparing to provide expert testimony in this Phase 2 proceeding.  
24 2. All preliminary, draft and final DOCUMENTS prepared by or on behalf  
25 of the DEPONENT which in any way pertain to the DEPONENT's review,

1 analysis, opinions, conclusions, or beliefs regarding the subject  
2 matter of the Phase 2 trial.

3 3. All DOCUMENTS that summarize the DEPONENT's education, training and  
4 experience, including all versions of DEPONENTS's resume or curriculum  
5 vitae.

6 4. All DOCUMENTS that the DEPONENT intends to use at the time of trial  
7 as illustrative or demonstrative evidence.

8 5. All photographs, video tapes, or other recordings which pertain to  
9 the DEPONENT's opinion in the Phase 2 trial.

10 6. All books, articles, treatises, reports, journals or other  
11 DOCUMENTS, which the DEPONENT reviewed, considered or relied upon as  
12 the basis for any opinion, conclusion, or analysis of the DEPONENT.

13 7. All DOCUMENTS that set forth the terms and conditions of the  
14 DEPONENT's employment in this matter.

15 8. All of the DEPONENT's time records and billing statements for work  
16 performed relating to the subject matter of this litigation.

17 9. All documents regarding the subject matter in this litigation that  
18 the DEPONENT previously authored, issued and/or collaborated with  
19 prior to DEPONENT's employment in this matter.

20 10. The DEPONENT's entire file concerning this proceeding.

21 11. All electronic files and software reviewed, considered or relied  
22 upon by the DEPONENT in reaching any opinion.

23 DATED: September 18, 2008

CALIFORNIA WATER SERVICE COMPANY

24 By: 

25 JOHN S. TOOTLE, ESQ.

**PROOF OF SERVICE (C.C.P. §1013a, 2015.5)**

## Antelope Valley Groundwater Cases

Judicial Counsel Proceeding No. 4408

Santa Clara County Superior Court Case No. 1-05-CV-049053

I am employed in the County of Los Angeles, State of California. I am

On September 18, 2008, I served the foregoing document(s) entitled:

**NOTICE OF EXPERT WITNESS DEPOSITIONS AND REQUEST FOR PRODUCTION OF DOCUMENTS**

by placing the true copies thereof enclosed in sealed envelopes addressed as stated on the attached mailing list.

by placing \_ the original, \_ a true copy thereof,  
enclosed in a sealed enveloped addressed as follows:

X BY SANTA CLARA SUPERIOR COURT E-FILING IN COMPLEX LITIGATION  
PURSUANT TO CLARIFICATION ORDER DATED OCTOBER 27, 2005.

Executed on September 18, 2008, at Torrance, California

X (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

(Federal) I declare that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.

Michael Duque