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GOVERNMENT CODE § 6103

Attorneys for Cross-Defendants,  
County Sanitation Districts of Los Angeles  
County Nos. 14 and 20

SUPERIOR COURT OF CALIFORNIA  
COUNTY OF LOS ANGELES

Coordination Proceeding  
Special Title (Rule 1550(b))

Judicial Council Coordination  
Proceeding No. 4408

**ANTELOPE VALLEY GROUNDWATER  
CASES**

ASSIGNED FOR ALL PURPOSES TO:  
Judge: Honorable Jack Komar

Included Actions:

Los Angeles County Waterworks District No. 40 v.  
Diamond Farming Co.  
Superior Court of California, County of Los Angeles,  
Case No. BC 325 201

WITNESS LIST AND EXHIBIT LIST  
FOR PHASE 6 TRIAL

Los Angeles County Waterworks District No. 40 v.  
Diamond Farming Co.  
Superior Court of California, County of Kern,  
Case No. S-1500-CV-254-348

DATE: August 3, 2015  
TIME: 10:00 A.M.  
PLACE: 111 N. Hill Street  
Los Angeles, CA  
DEPT.: TBD

Wm. Bolthouse Farms, Inc. v. City of Lancaster  
Diamond Farming Co. v. City of Lancaster  
Diamond Farming Co. v. Palmdale Water Dist.  
Superior Court of California, County of Riverside,  
consolidated actions, Case Nos. RIC 353 840, RIC  
344 436,  
RIC 344 668.

1 The County Sanitation Districts of Los Angeles County Nos. 14 (Lancaster) and 20  
2 (Palmdale) (collectively "Districts"), cross-defendants in the above action, hereby designate the  
3 following witnesses and exhibits, to the extent such are needed, during the Phase 6 trial.

4 **I. WITNESS LIST**

- 5 1. Raymond Tremblay as a percipient witness for the Districts as to the ownership of  
6 property by the Districts and the reasonable and beneficial use of water by the Districts.  
7 It is uncertain whether the testimony of Mr. Tremblay will be needed for this phase of  
8 trial. If Mr. Tremblay's testimony is necessary, the estimated length of time of the direct  
9 testimony is less than one hour.
- 10 2. Robert Beeby; non-retained, shared expert designated by Public Water Suppliers and  
11 Antelope Valley-East Kern Water Agency ("AVEK") to testify as to the reasonableness  
12 of water use by Stipulating Parties and the fairness of the proposed Stipulated Judgment  
13 and Physical Solution;
- 14 3. David H. Peterson, non-retained, shared expert designated by AVEK to testify as to the  
15 reasonableness of water use by Stipulating Parties;
- 16 4. Dennis Williams, non-retained, shared expert designated by Public Water Suppliers and  
17 AVEK, to testify as to the value and feasibility of the proposed Stipulated Judgment and  
18 Physical Solution;
- 19 5. Robert C. Wagner, non-retained, shared expert designated by AVEK to testify as to the  
20 reasonableness of water use by Stipulating Parties and the fairness of the proposed  
21 Stipulated Judgment and Physical Solution; and
- 22 6. Charles Binder, non-retained, shared expert designated by AVEK to testify as to the  
23 fairness of the proposed Stipulated Judgment and Physical Solution.

24  
25 **II. EXHIBIT LIST**

26 LACSD-1: APNs of Lancaster and Palmdale District Owned Parcels

27 LACSD-2: Maps depicting Lancaster land owned by Districts and under production in 2000:

Sheet 1: Sections 23, 24 and 19; Sheet 2: Sections 26, 25 and 30; Sheet 3: Sections 35, 36 and 31.

LACSD-3: Maps depicting Lancaster land owned by Districts and under production in 2001:  
Sheet 1: Sections 23, 24 and 19; Sheet 2: Sections 26, 25 and 30; Sheet 3: Sections 35, 36 and 31.

LACSD-4: Maps depicting Lancaster land owned by Districts and under production in 2002:  
Sheet 1: Sections 23, 24 and 19; Sheet 2: Sections 26, 25 and 30; Sheet 3: Sections 35, 36 and 31.

LACSD- 5: Maps depicting Lancaster land owned by Districts and under production in 2003:  
Sheet 1: Sections 23, 24 and 19; Sheet 2: Sections 26, 25 and 30; Sheet 3: Sections 35, 36 and 31.

LACSD- 6: Maps depicting Lancaster land owned by Districts and under production in 2004:  
Sheet 1: Sections 23, 24 and 19; Sheet 2: Sections 26, 25 and 30; Sheet 3: Sections 35, 36 and 31.

LACSD- 7: Maps depicting Palmdale land owned by Districts and under production: 2002-2004

LACSD-8: Maps depicting Palmdale land owned by Districts and under production: 2002

LACSD-9: Maps depicting Palmdale land owned by Districts and under production: 2003

LACSD-10: Maps depicting Palmdale land owned by Districts and under production: 2004

LACSD-11: Water Meter Records for 2011 and 2012.

LACSD-12: Crop Production Based on Pesticide Use Reports.

LACSD-13: Pesticide Use Records from California Department of Public Health.

LACSD-14: Declaration of Raymond Tremblay dated January 31, 2013.

LACSD-15: Response of Districts to Phase 4 Discovery Order dated December 20, 2012.

LACSD-16: Supplemental Declaration of Raymond Tremblay dated April 27, 2015.

LACSD – 17: Recordations of Groundwater Pumping filed with the State Water Resources Control Board pursuant to Water Code section 4999, *et seq.*

1 This disclosure is made pursuant to the Court's Second Amended Case Management Order. The  
2 above list does not include any witnesses to be called for rebuttal or impeachment purposes, if  
3 any. The Districts reserve the right to call witnesses not identified on this list for such purposes.  
4 The Districts also reserve the right to amend or supplement this list and will amend or modify  
5 their witness list to the extent necessary.

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8  
9 Dated: April 27, 2015

Respectfully submitted,

ELLISON, SCHNEIDER & HARRIS, LLP

11  
12 By: 

13 Christopher M. Sanders  
14 Attorneys for Cross-Defendants,  
15 County Sanitation Districts of Los  
16 Angeles County Nos. 14 and 20  
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