

1 **HANNA AND MORTON LLP**  
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8 Attorneys for Cross-Defendant  
9 WAGAS LAND COMPANY LLC  
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11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
12 **COUNTY OF SANTA CLARA**  
13

14 **ANTELOPE VALLEY GROUNDWATER**  
15 **CASES**

16 Plaintiffs  
17  
18

**Judicial Council Coordination Proceeding**  
**No. 4408**

**WAGAS LAND COMPANY LLC'S**  
**NON-EXPERT WITNESS**  
**DESIGNATION**

Trial Date: February 11, 2013  
Time: 9:00 a.m.  
Dept: LASC, Dept. 1  
Judge: Hon. Jack Komar

19 **TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:**  
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21 **PLEASE TAKE NOTICE** that WAGAS LAND COMPANY LLC (hereinafter  
22 "WAGAS") designates Edward A. Wopschall, a managing member of WAGAS, as a non-expert  
23 witness in the above-entitled action. Mr. Wopschall is prepared to testify that he is the custodian  
24 of WAGAS business records, that the Edison Company pump test reports showing volumes of  
25 water pumped on the WAGAS property are regularly maintained by WAGAS as business  
26 records, that based on his personal observation all of the water pumped on the WAGAS property,  
27 except for a small amount consumed for domestic purposes, is and has been used during all  
28 relevant years to maintain and enhance wildlife habitat, that regularly maintained business records

1 of WAGAS as well as other documents, including an original minute book, and memorabilia in  
2 the possession of WAGAS demonstrate that the WAGAS property has been so used since 1925.  
3 Edward A. Wopschall is available on reasonable notice for deposition during the period January  
4 14, 2013 through January 31, 2013.

5  
6 Dated: January 4, 2013

HANNA AND MORTON LLP  
EDWARD S. RENWICK

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9 By: 

Edward S. Renwick

10 Attorneys for Cross-Defendant  
11 WAGAS Land Company LLC  
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I am over the age of eighteen and not a party to the within action. I am employed by Hanna and Morton LLP in the County of Los Angeles, State of California. My business address is 444 South Flower Street, Suite 1500, Los Angeles, CA 90071-2916.

on the interested parties in this action, by posting the document(s) listed above to the Santa Clara County Superior Court e-filing website (<http://www.scefilng.org>) under the Antelope Valley Groundwater matter pursuant to the Court's Order dated October 27, 2005.

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

*Sylvia Cantos*  
Sylvia Cantos