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10 **Attorneys for Cross-Defendant**
11 **Copa De Oro Land Company**

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

14 **Coordination Proceeding Special Title**
15 **(Rule 1550(b))**

16 **ANTELOPE VALLEY GROUNDWATER**
17 **CASES**

18 **Included Actions:**

19 **Los Angeles County Waterworks District**
20 **No. 40 v. Diamond Farming Co., Superior**
21 **Court of California, County of Los Angeles,**
22 **Case No. BC 325 201;**

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

27 **Wm. Bolthouse Farms, Inc. v. City of**
28 **Lancaster, Diamond Farming Co. v.**
29 **Lancaster, Diamond Farming Co. v.**
30 **Palmdale Water Dist., Superior Court of**
31 **California, County of Riverside, Case No.**
32 **RIC 353 840, RIC 344 436, RIC 344 668**

JUDICIAL COUNCIL COORDINATION
PROCEEDING NO. 4408

Case No. BC 391869
Assigned to Hon. Jack Komar

(Santa Clara Case No. 01-05-CV-049053)

EXPERT WITNESS DESIGNATION
AND EXPERT WITNESS
DECLARATION OF COPA DE ORO
LAND COMPANY FOR PHASE 4
TRIAL

(CCP § 2034.210, 2034.260(c))

8792/010413/P010313rsb (Expert)

COPA DE ORO'S EXPERT WITNESS DESIGNATION AND DECLARATION

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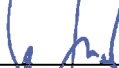
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Respectfully submitted,

BARTKIEWICZ, KRO
A Professional Corpora

By:  _____
Ryan S. Bezerra

Attorneys for Cross-De
Company

BARTKIEWICZ, KRONICK & SHANAHAN
A Professional Corporation

By: 
Ryan S. Bezerra

Attorneys for Cross-Defendant Copa de Oro La
Company

By:
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Ryan S. Bezerra
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Attorneys for Cross-Defendant Copa de Oro Land
Company

EXPERT WITNESS DECLARATION

I, Ryan S. Bezerra, declare:

1. I am an attorney at law licensed to practice in the State of California and a shareholder in the law firm of Bartkiewicz, Kronick & Shanahan.

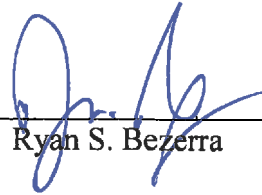
2. I am an attorney of record in the above-captioned matter for cross-defendant Copa de Oro Land Company, a California general partnership ("Copa de Oro"). I am familiar with this action and am submitting this expert witness declaration pursuant to Code of Civil Procedure section 2034.260, subdivision (c) and the Court's December 12, 2012 Case Management Order for Phase 4 Trial.

3. Vera H. Nelson, P.E., of Erler & Kalinowski, Inc., has agreed to testify in the Phase 4 trial as Copa de Oro's designated expert. With regard to Ms. Nelson, I am informed and believe the following to be true:

- (a) Ms. Nelson is a hydrogeologist and water resources engineer, and a licensed professional engineer, with more than 26 years of experience, as described in greater detail in her resume, a copy of which is attached hereto as Exhibit A.
- (b) Ms. Nelson will testify concerning water use on Copa de Oro's property, specifically recent agricultural use of the property and evidence of historical groundwater production. A copy of Ms. Nelson's report concerning these subjects is attached hereto as Exhibit B. If necessary, Ms. Nelson also will review and critique the testimony of any other expert witness or witnesses who will testify concerning the subjects of her testimony and give her opinion as to whether she agrees or disagrees with their opinions.
- (c) Ms. Nelson will be sufficiently familiar with the pending action to submit to a meaningful oral deposition concerning the specific testimony, including her opinions and their bases, that she is expected to give at trial.
- (d) Ms. Nelson's hourly fee for providing deposition testimony and consulting with the retaining attorney is \$240, plus expenses.

1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct except for those matters stated on my information and belief and,
3 as to those matters, I believe it to be true.

4 Executed at Sacramento, California on January 4, 2013

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7 _____
8 Ryan S. Bezerra

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I am a citizen of the United States and a resident of Sacramento County. I am over the age of 18, not a party to this action and am employed at Bartkiewicz, Kronick & Shanahan, 1011 Twenty-Second Street, Sacramento, California 95816. On January 4, 2012, I served, in the manner described below, the following document:

I posted this document to the Court's World Wide Website located at www.scefiling.org.

Executed at Sacramento, California on January 4, 2013.

8792/010413/P010313rsb (Expert)