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**Attorneys for:** Gene T. Bahlman, Mark W. and Nancy L. Benz, Thomas and Julie Bookman 2007 Trust, James and Elizabeth Bridwell, Brittner Trust, Glen Brittner, Trustee, John A. Calandri, Calandri Water Company, LLC; John A. Calandri and Shannon C. Calandri as co-trustees of the John and Shannon Calandri 1992 Trust"; Katherine J. Calandri Nelson, Trustee of "The Katherine J. Calandri Nelson 2008 Trust, Sal and Connie L. Cardile, Irma Ann Carle Trust, Irma-Anne Carle, Trustee, Effren Chavez, C. Louise R. Close Living Trust, Del Sur Ranch LLC, Randall and Billie Dickey, Lawrence Dean Evans, Jr. and Susan Evans, Ruth C. Findley, Leah Frankenberg, Denise Godde, Steven F. Godde, Pamela M. Godde and Gary M. Godde; Denise Godde and Steven Godde as Trustees of the D & S Godde Trust, Gorrindo Resourceful LLC, Laura Griffin, trustee of the Family Bypass Trust created under the Leonard W. Griffin And Laura Griffin Trust, dated July 9, 1993, Jane Healy and Healy Enterprises Inc., Gailen W. Kyle and Julie Kyle, Trustees of The Kyle Revocable Living Trust, James M. Leer, III and Diana Leer, Jose M. Maritorea and Marie P. Maritorea, Trustees of the Maritorea Living Trust Dated March 16, 1993, Dennis M. and Diane K. McWilliams, Richard Miner, Barry and Sharon Munz 2014 Revocable Trust, Terry A. & Kathleen M. Munz, Eugene B. Nebeker, Richard Nelson, Willow Springs Co., R and M Ranch, Inc., John and Adrienne Rea, Suzanne J. Richter, Sahara Nursery and Farm, Lawrence J. Schilling and Mary P. Schilling, Trustees of the L&M Schilling 1992 Family Trust, Lilia Mabel Selak, TTEE; Barbara Aznarez Decd Trust and Selak, Mabel Trust, Jeffrey and Nancee Siebert, Tierra Bonita Ranch, Triple M Property Co., Turk Trust dated December 16, 1998, Marie A. Unini and Robert J. LeClair, Vulcan Materials Co., Vulcan Lands Inc., Consolidated Rock Products Co., Calmat Land Co., and allied Concrete & Materials, Michael and Dolores A. Weatherbie, Donna & Lee Wilson, collectively known as the Antelope Valley Groundwater Agreement Association ("AGWA")

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**FOR THE COUNTY OF LOS ANGELES**

**ANTELOPE VALLEY**  
**GROUNDWATER CASES**

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 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 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 No. RIC 353 840, RIC 344 436, RIC 344 668

) PROVE-UP

) Trial Date: August 3, 2015

) Time: 10:00 A.M.

) Dept.: Dept. 1, Los Angeles

) Judge: Hon. Jack Komar

**AGWA DISCLOSURE OF WITNESSES  
AND EXHIBITS FOR PROVE-UP OF  
STIPULATED JUDGMENT AND  
PHYSICAL SOLUTION**

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1 Cross-Defendants/Cross-Complainants member of the Antelope Valley Groundwater  
2 Agreement Association ("AGWA") submit the following list of potential witnesses, should they  
3 be required to present testimony and/or evidence, with respect to the Prove-Up Trial.

4 If necessary, AGWA will present testimony by a person most knowledgeable for each  
5 AGWA member listed on the Stipulated Judgment's Exhibit 4:

- 6 1. Gene Bahlman
- 7 2. Mark W. and Nancy L. Benz
- 8 3. Thomas and Julie Bookman 2007 Trust
- 9 4. James and Elizabeth Bridwell
- 10 5. Brittner Trust, Glen Brittner, Trustee
- 11 6. John A. Calandri; Calandri Water Company, LLC; John A. Calandri and Shannon  
12 C. Calandri as cotrustees of "The John and Shannon Calandri 1992 Trust"; Katherine J. Calandri  
13 Nelson, Trustee of "The Katherine J. Calandri Nelson 2008 Trust
- 14 7. Sal and Connie Cardile
- 15 8. Irma Ann Carle Trust, Irma-Anne Carle, Trustee
- 16 9. Effren Chavez
- 17 10. C. Louise R. Close Living Trust
- 18 11. Del Sur Ranch LLC
- 19 12. Randall and Billie Dickey
- 20 13. Lawrence Dean Evans, Jr. and Susan Evans
- 21 14. Ruth C. Findley
- 22 15. Leah Frankenberg
- 23 16. Denise Godde, Steven F. Godde, Pamela M. Godde and Gary M. Godde; Denise  
24 Godde and Steven Godde as Trustees of the D & S Godde Trust
- 25 17. Gorrindo Resourceful LLC
- 26 18. Laura Griffin, trustee of the Family Bypass Trust created under the Leonard W.  
27 Griffin and Laura Griffin Trust, dated July 9, 1993

19. Jane Healy and Healy Enterprises Inc.
20. Gailen W. Kyle and Julie Kyle, Trustees of The Kyle Revocable Living Trust
21. James M. Leer, III and Diana Leer
22. Jose M. Maritorena and Marie P. Maritorena, Trustees of the Maritorena Living Trust Dated March 16, 1993
23. Dennis M. and Diane K. McWilliams
24. Richard Miner
25. Barry and Sharon Munz 2014 Revocable Trust, Terry A. & Kathleen M. Munz
26. Eugene B. Nebeker
27. Richard Nelson, Willow Springs Co.
28. R and M Ranch, Inc.
29. John and Adrienne Reca
30. Suzanne J. Richter
31. Sahara Nursery and Farm
32. Lawrence J. Schilling and Mary P. Schilling, Trustees of the L&M Schilling 1992 Family Trust
33. Lilia Mabel Selak, TTEE; Barbara Aznarez Decd Trust and Selak, Mabel Trust
34. Jeffrey and Nancee Siebert
35. Tierra Bonita Ranch
36. Triple M Property Co.
37. Turk Trust dated December 16, 1998
38. Marie A. Unini and Robert J. LeClair
39. Vulcan Materials Co., Vulcan Lands Inc., Consolidated Rock Products Co., Calmat Land Co., and allied Concrete & Materials
40. Michael and Dolores A. Weatherbie
41. Donna & Lee Wilson
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1 At the Phase IV Trial, the members of AGWA marked and secured the admission of  
2 evidence (documents and information) to establish its member's property ownership, groundwater  
3 production, and beneficial uses of water. The members of AGWA also provided a substantial  
4 amount of information through the Court ordered discovery process (posted to t

5 To the extent that the Court determines that the evidence that was admitted in the Phase  
6 IV Trial was admitted only for a limited purpose, AGWA intends to move to re-admit the  
7 documents and to move for admission of any other information provided as part of the Phase IV  
8 discovery process. AGWA will also, if necessary, call the designated non-expert witness for the  
9 applicable AGWA member to establish their property ownership, groundwater production and  
10 beneficial use of water for the purposes of the Prove-Up Trial.

11 At this time, the AGWA estimates that the testimony of each non-expert witness will  
12 encompass approximately fifteen (15) minutes of time.

13 AGWA also reserves the right to call, depending upon their testimony on direct  
14 examination, the following expert witnesses:

15 1. Dennis Williams (non-retained shared expert witness with Public Water Suppliers  
16 – as regards the Physical Solution).

17 2. Robert Beeby (non-retained shared expert witness with Public Water Suppliers –  
18 as regards reasonable and beneficial use of water).

19 3. Robert Wagner (non-retained shared expert witness with AVEK and Overlying  
20 Landowners – as regards the physical solution).

21 4. Charles Binder (non-retained shared expert witness with AVEK and Overlying  
22 Landowners – as regards the physical solution).

23 5. David Peterson (non-retained shared expert witness with AVEK and Overlying  
24 Landowners – as to the issues of reasonable and beneficial use of water).

25 6. Dr. Eugene Nebeker (non-retained expert witness – as to the issues of reasonable  
26 and beneficial use of water; historical and current farming practices in the Antelope Valley).

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1 At this time, the AGWA cannot provide an estimate of time for the above non-retained  
2 shared expert witnesses.

3 AGWA believes this statement fairly discloses the witnesses and exhibits it will rely upon  
4 for the trial scheduled to commence in August, 2015. AGWA reserves the right to amend this  
5 disclosure statement as appropriate and based upon discovery of additional evidence.

6 Dated: April 27, 2015

BROWNSTEIN HYATT FARBER SCHRECK, LLP

7  
8 By: 

9 MICHAEL T. FIFE  
10 BRADLEY J. HERREMA  
11 ATTORNEYS FOR AGWA  
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**PROOF OF SERVICE**

I, Olga Rittershaus, am employed in the County of Santa Barbara, State of California. I am over the age of 18 and not a party to the within action; my business address is: Brownstein Hyatt Farber Schreck, LLP, 1020 State Street, Santa Barbara, California 93101.

On April 27, 2015, I served the foregoing document described as:

**AGWA DISCLOSURE OF WITNESSES AND EXHIBITS FOR PROVE-UP OF  
STIPULATED JUDGMENT AND PHYSICAL SOLUTION**

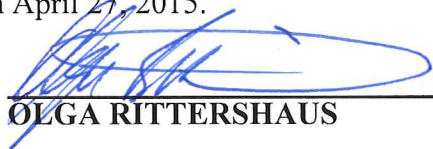
on the interested parties in this action.

By posting the document listed above to the Santa Clara Superior Court website:  
[www.scefiling.org](http://www.scefiling.org) by 5:00 p.m. on April 27, 2015.

This posting was reported as complete and without error.

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

Executed in Santa Barbara, California, on April 27, 2015.

  
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**OLGA RITTERSHAUS**