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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES - CENTRAL DISTRICT**

Coordinated Proceedings
Special Title {Rule 1550 (b)}

) Judicial Council Coordination
) Proceeding No. 4408

**ANTELOPE VALLEY GROUNDWATER
CASES**

) Santa Clara Case No. 1-05-CV-049053
) Assigned to Hon. Jack Komar

Included Actions:

) **BLUM TRUST'S WITNESS & EXHIBIT LIST
FOR THE PROVE-UP OF THE [PROPOSED]
STIPULATED JUDGMENT AND PHYSICAL
SOLUTION TRIAL**

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

) Trial Date: August 3, 2015
) Time: 10:00 a.m.

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

) LA Dept.: 222
) Judge: Hon. Jack Komar

Wm. Bolthouse Farms, Inc., v. City of
Lancaster; Diamond Farming Co. v. City of
Lancaster; Diamond Farming Co. v. City of
Palmdale Water District.
Riverside County Superior Court
Consolidated Action Nos. RIC 344 840,
RIC 344 436, RIC 344 668

AND RELATED CROSS-ACTIONS

TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that in accordance with the Court's Second Case Management Order dated March 27, 2015, Blum Trust hereby discloses the following list of potential witnesses should they be required to provide testimony, and exhibits with respect to the prove-up of the [Proposed] Stipulated Judgment and Physical Solution Trial:

<u>WITNESS NAME</u>	<u>GENERAL DESCRIPTION OF OF TESTIMONY</u>
1. Sheldon Blum/ BLUM TRUST	Overlying landowner of approximately 150 acres located in the Antelope Valley Basin. Reasonable and beneficial use for agriculture crops.
2. Daniel Wilke	Mr. Daniel Wilke is the Irrigation Manager For Wm. Bolthouse Farms, Inc., who conducted farming operations and crop rotation, reasonable and beneficial used on Blum Trust's farmland.
3. Anthony L. Leggio	Mr. Anthony L. Leggio is the President of Bolthouse Properties, LLC., whose business records identify the crop rotation and irrigated acres reasonably and beneficially used for growing carrots and onions on Blum Trust's farmland.
4. Ali Shahroody	Mr. Ali Shahroody is a Water Resources Engineer, licensed as an agricultural and civil engineer in the States of CA., AZ and NV, and President of Stetson Engineers, Inc. Mr. Shahroody will provide expert testimony pertaining to the reasonable and beneficial use on Blum Trust's farmland.
5. Robert Beeby	Non-retained shared expert witness with Public Water Suppliers in regards to reasonable and beneficial use of water.
6. David Peterson	Non-retained shared expert witness with Public Water Suppliers in regards to reasonable and beneficial use of water.
7. Dennis Williams	Non-retained shared expert witness with Public Water Suppliers in regards to the [Proposed Judgment & Physical Solution.

Blum Trust estimates 1-2 hours to present the testimony of the non-expert witnesses and cannot provide an estimate of time for the non-retained expert witnesses, except that Mr.

1 Ali Shahroody's testimony should not exceed 1 hour.

2 Blum Trust's list does not include any witnesses for rebuttal and impeachment, if
3 any. In addition to the witness listed above, Blum Trust reserves the right to supplement or
4 add to this list of witnesses if necessary.

5 Blum Trust intends to introduce evidence of its reasonable and beneficial use
6 for irrigating and harvesting agriculture crops, including carrots and onions; its groundwater
7 pumping/usage and its intent to do so in the future from the Antelope Valley Groundwater
8 Basin. In support of its claim, Blum Trust will introduce the following Exhibits:

10 **EXHIBITS**

DESCRIPTION

11 Blum Trust-1	Certified Copy/Recorded Writing of the County of Los Angeles Register-Recorder County Clerk's recorded a 1998 Trust Transfer Deed for APNs: Parcel-1, 3384-009-001; and Parcel 2-3384-009-006 establishing Blum Trust as an overlying landowner under Evidence Code §§1280;1530-1532; and/or 1600.
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14 Blum Trust-2	Certified Copy/Recorded Writing of the California Dept. of Water Resources Southern District Water Well Index Cards for Blum Trust's APN Parcel 1 3384-009-001, and Parcel 2 3384-009-006 under Evidence Code §1280; 1530-1532; 1560-1562; and/or 1600. Location of Blum Trust's farmland and location of approx. water wells under Evidence Code §801 & 802.
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18 Blum Trust-3	Business record Lease Agreement dated August 2, 2001 & Modification of Lease dated May 17, 2004 between Blum Trust & Wm. Bolthouse Farms Inc under Evidence Code §1270; 1271 & 1413.
19	
20 Blum Trust-4	Further Updated Declaration of Dan Wilke Regarding Water Use On Blum Trust Property dated September 6, 2012 with attached Exhibit A. Evidence Code §§1220-1222 & 1414.
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22	
23 Blum Trust-5	Addendum Exhibit P-1 Crop Rotation To Declaration Of Anthony L. Leggio In Lieu of Deposition Testimony For Phase 4 Trial dated May 13, 2013, including business records under Evidence Code §§1220-1222; 1270-1271 & 1414.
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- 1 Blum Trust-6 Photographs of 120 Acs. of Blum Trust's farmland and irrigation
2 system under Evidence Code 1413.
- 3 Blum Trust-7 Declaration of Sheldon Blum In Support of Blum Trust's Overlying
4 Production Rights In The Antelope Valley Basin dated April 14, 2015.
- 5 Blum Trust-8 Certified Copy/Recorded Writing of the County of Los Angeles
6 Register-Recorder County Clerk's recorded a 1998 Trust Transfer
7 Deed for APN: Parcel-3 3384-020-012; Parcel-4 3384-020-013; &
8 Parcel-5 3262-016, establishing Blum Trust as an overlying
9 landowner under Evidence Code §§1280;1530-1532; and/or 1600.

10 In addition to the exhibits listed above, Blum Trust reserves the right to supplement or
11 add to this list of exhibits if necessary.

12 Dated: April 27, 2015

Law Offices of Sheldon R. Blum

By: 

Sheldon R. Blum, Esq.
Attorney For Blum Trust