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Defendant Tejon Ranchcorp

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

|   |   |  |
|---|---|--|
| ANTELOPE VALLEY GROUNDWATER                     | ) | Judicial Council Coordination No. 4408 |
| CASES   | ) |  |
|   | ) | Santa Clara Case No. 1-05-CV-049053    |
| Included Actions:                               | ) | Assigned to Hon. Jack Komar            |
| Los Angeles County Waterworks District No. 40   | ) |  |
| v. Diamond Farming Co., Superior Court of       | ) | <b>NOTICE OF EXPERT WITNESS</b>        |
| California, County of Los Angeles, Case No. BC  | ) | <b>DEPOSITIONS AND REQUEST FOR</b>     |
| 325201;   | ) | <b>PRODUCTION OF DOCUMENTS</b>         |
|   | ) |  |
| Los Angeles County Waterworks District No. 40   | ) |  |
| v. Diamond Farming Co., Superior Court of       | ) |  |
| California, County of Kern, Case No. S-1500-CV- | ) | Date: September 9, 11, 2008            |
| 254-348;  | ) | Time: 9:30 a.m.                        |
|   | ) | Place: Tejon Ranch                     |
| Wm. Bolthouse Farms, Inc. v. City of Lancaster, | ) | 4436 Lebec Road                        |
| Diamond Farming Co. v. Lancaster, Diamond       | ) | Lebec, CA 93243                        |
| Farming Co. v. Palmdale Water Dist., Superior   | ) |  |
| Court of California, County of Riverside, Case  | ) |  |
| No. RIC 353 840, RIC 344 436, RIC 344 668       | ) | Phase 2 Trial Date: October 6, 2008    |

NOTICE IS HEREBY GIVEN as follows:

**I. NOTICE OF DEPOSITION**

TEJON RANCHCORP (the "NOTICING PARTY") will take the deposition of the following expert witnesses (the "DEPONENTS") at Tejon Ranch Headquarters, 4436

Lebec Road, Lebec, California 93243, at the following dates and times and will continue from day-to-day thereafter, weekends and holidays excepted:

| <u>Deponent</u>    | <u>Date</u>        | <u>Time</u> |
|--------------------|--------------------|-------------|
| Timothy J. Durbin  | September 9, 2008  | 9:30 a.m.   |
| June A. Obendorfer | September 11, 2008 | 9:30 a.m.   |

## II. REQUEST FOR PRODUCTION

### A. DEFINITIONS

The following words and phrases shall govern the construction of this document unless the context otherwise requires:

- "NOTICING PARTY" or "Tejon" means TEJON RANCHCORP.
- "DEPONENT" or "YOU" or "YOUR" means the deponent as set forth in the notice.
- "DOCUMENT" means "writing" as defined by Evidence Code section 250 and includes drafts, originals and duplicates of written, graphic, computer or otherwise recorded matters, whether stored in written, electronic, magnetic or photographic format or by any other means.

### B. DOCUMENTS AND THINGS TO BE PRODUCED

The DEPONENT is required to produce, at the date, time and location so noticed, all DOCUMENTS described below. This demand relates not only to all DOCUMENTS under the DEPONENT's possession, custody or control, but also those DOCUMENTS reasonably available to the DEPONENT.

- All DOCUMENTS received, reviewed or relied upon by the DEPONENT in preparing to provide expert testimony in this proceeding.

2. All preliminary, draft and final DOCUMENTS prepared by or on behalf of the DEPONENT which in any way pertain to the DEPONENT's review, analysis, opinions, conclusions, or beliefs regarding the subject matter of the Phase 2 trial.

3. All DOCUMENTS that summarize the DEPONENT's education, training and experience, including all versions of DEPONENT's resume or curriculum vitae.

4. All DOCUMENTS that the DEPONENT intends to use at the time of trial as illustrative or demonstrative evidence.

5. All photographs, video tapes, or other recordings which pertain to the DEPONENT's opinion in the Phase 2 trial.

6. All books, articles, treatises, reports, journals or other DOCUMENTS, which the DEPONENT reviewed, considered or relied upon as the basis for any opinion, conclusion, or analysis of the DEPONENT.

7. All DOCUMENTS that set forth the terms and conditions of the DEPONENT's employment in this matter.


8. All of the DEPONENT's time records and billing statements for work performed relating to the subject matter of this litigation.

9. The DEPONENT'S entire file concerning this proceeding.

10. All electronic files and software reviewed, considered or relied upon by the DEPONENT in reaching any opinion.

Dated: August 27, 2008

KUHS & PARKER

By   
Robert G. Kuhs,  
Attorney for Tejon Ranchcorp

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**PROOF OF SERVICE**

I, Lidia E. Luna, declare:

I am employed in the County of Kern, State of California. I am over the age of 18 and am not a party to the within action; my business address is Kuhs & Parker, 1200 Truxtun Avenue, Suite 200, Bakersfield, California 93301.

On August 27, 2008, I caused the foregoing document(s) described as:  
**NOTICE OF EXPERT WITNESS DEPOSITIONS AND REQUEST FOR PRODUCTION OF DOCUMENTS** to be served on the parties in this action, as follows::

(X) (BY ELECTRONIC SERVICE) by posting the document(s) listed above to the Santa Clara County Superior Court website: [www.scefiling.org](http://www.scefiling.org) regarding the Antelope Valley Groundwater matter.

( ) (BY U.S. MAIL) I am readily familiar with the firm's practice of collection and processing of documents for mailing. Under that practice, the above-referenced document(s) were placed in seal envelope(s) addressed to the parties as noted above, with postage thereon fully prepaid and deposited such envelope(s) with the United States Postal Service on the same date at Bakersfield, California, addressed to:

( ) (BY FEDERAL EXPRESS) I served a true and correct copy by Federal Express or other overnight delivery service, for delivery on the next business day. Each copy was enclosed in an envelope or package designated by the express service carrier; deposited in a facility regularly maintained by the express service carrier or delivered to a courier or driver authorized to receive documents on its behalf; with delivery fees paid or provided for; addressed as shown on the accompanying service list.

( ) (BY FACSIMILE TRANSMISSION) I am "readily familiar" with the firm's practice of facsimile transmission of documents. It is transmitted to the recipient on the same day in the ordinary course of business.

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

( ) (FEDERAL) I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

  
Lidia E. Luna