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Attorney for Cross-Defendant and
Cross-Complainant Tejon Ranchcorp

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES - CENTRAL DISTRICT

ANTELOPE VALLEY GROUNDWATER) Judicial Council Coordination No. 4408
CASES)
Included Actions:) Santa Clara Case No. 1-05-CV-049053
Assigned to The Honorable Jack Komar

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

PHASE 2 TRIAL:

**TEJON RANCHCORP'S
PRELIMINARY WITNESS LIST**

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)

Date: October 6, 2008
Time: 9:00 a.m.
Dept.: 1

Wm. Bolthouse Farms, Inc. v. City of Lancaster,)
Diamond Farming Co. v. Lancaster, Diamond)
Farming Co. v. Palmdale Water Dist.)
Superior Court of California, County of)
Riverside, consolidated actions Case Nos. RIC)
353 840, RIC 344 436, RIC 344 668)

TEJON RANCHCORP,

Cross-Complainant,

v.

LOS ANGELES COUNTY WATERWORKS
DISTRICT NO. 40; ROSAMOND COMMUNITY
SERVICES DISTRICT; and DOES 1 through 100,

Cross-Defendants.

Cross-defendant and cross-complainant TEJON RANCHCORP (Tejon) hereby submits the list of witnesses it intends to call in its case-in-chief. Pretrial discovery has not been completed. Tejon will supplement this list from time-to-time as required.

1. E. John List, Ph.D., P.E. Dr. List was Professor of Environmental Science at the California Institute of Technology from 1969 through 1997. From 1984 through 1989 Dr. List was editor of the *Journal of Hydraulic Engineering*, American Society of Civil Engineers. Since 1997 Dr. List has been the President and principal consultant of Flow Science Incorporated.

Dr. List will testify that (a) multiple lines of evidence (seismic crustal surveys, gravity anomaly surveys, and well log data) support the conclusion that the southern portion of the Antelope Valley Area of Adjudication (AVAA) is divided into two substantially independent groundwater basins, (b) these basins are physically separated by a partially buried ridge of bedrock (Bedrock Ridge) extending northeast from the Antelope Buttes through Little Buttes to the Willow Springs Fault, (c) the Bedrock Ridge provides a substantial restriction to groundwater flow between the two basins, (d) the extraction of groundwater east of the Bedrock Ridge does not significantly impact groundwater levels west of the Bedrock Ridge, and vice-versa, and (e) land subsidence resulting from pumping east of the Bedrock Ridge is not

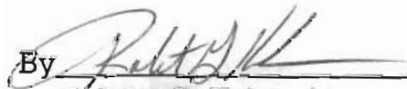
1 manifest west of the Bedrock Ridge. Dr. List's testimony on direct examination is
2 estimated to last about three hours.

3 2. Richard A. Rhone, P.E. Mr. Rhone is a senior consultant with Bookman-
4 Edmonston, a division of GEI Consultants, and has over 45 years of experience in all
5 aspects of water resource development, engineering, management, operations and
6 planning. Mr. Rhone will testify that (a) the southern AVAA is divided into two
7 substantially independent groundwater basins, (b) these basins are physically
8 divided by the Bedrock Ridge extending northeast from the Antelope Buttes through
9 the Little Buttes to the Willow Springs Fault, (c) the Bedrock Ridge provides a
10 substantial barrier to groundwater flow between the area west of the Bedrock Ridge
11 and the area east of the Bedrock Ridge, (d) the extraction of groundwater west of the
12 Bedrock Ridge does not significantly or materially affect groundwater levels east of
13 the Bedrock Ridge, and vice versa. Mr. Rhone's testimony on direct examination is
14 estimated to last about three hours.

15 Dated: September 29, 2008

16 Respectfully submitted,

17 KUHS & PARKER

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19
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21 By 

22 Robert G. Kuhs, Attorney for Tejon

23 C:\WPDATA\WCK\Tejon Ranch\Phase II Trial Preliminary List of Witnesses2.wpd


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 September 29, 2008, I caused the foregoing document(s) described as: **PHASE 2 TRIAL: TEJON RANCHCORP'S PRELIMINARY WITNESS LIST** 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.scefilng.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