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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)

Included Actions:) Santa Clara Case No. 1-05-CV-049053

Los Angeles County Waterworks District No. 40) Assigned to Hon. Jack Komar

v. Diamond Farming Co., Superior Court of) **NOTICE OF EXPERT DEPOSITION**
California, County of Los Angeles, Case No. BC) **AND REQUEST FOR PRODUCTION**
325201;) **OF DOCUMENTS**

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 24, 2008

Wm. Bolthouse Farms, Inc. v. City of Lancaster,) Time: 9:30 a.m.
Diamond Farming Co. v. Lancaster, Diamond) Place: Tejon Ranch
Farming Co. v. Palmdale Water Dist., Superior) 4436 Lebec Road
Court of California, County of Riverside, Case) Lebec, CA 93243

No. RIC 353 840, RIC 344 436, RIC 344 668)
Phase 2 Trial Date: October 6, 2008

NOTICE IS HEREBY GIVEN as follows:

The defendant TEJON RANCHCORP (the "Noticing Party") will take the
deposition of TOM SHEAHAN (the "Deponent") at the law offices of Kuhs & Parker,
1200 Truxtun Avenue, Suite 200, Bakersfield, California 93301, at the following date

1 and time and will continue from day-to-day thereafter, weekends and holidays
2 excepted:

| 3 <u>Witness</u> | 4 <u>Date</u> | 5 <u>Time</u> |
|------------------|--------------------|---------------|
| 6 Tom Sheahan | 7 October 24, 2008 | 8 9:30 a.m. |

9 The deponent is required to produce the documents, records and other
10 materials described in the attached **Exhibit A**.

11 A list of all parties or attorneys on whom this notice is being served is
12 shown on the accompanying Proof of Service.

13 Dated: October 14, 2008

KUHS & PARKER

14 By 

15 Robert G. Kuhs, Attorneys
16 for the Defendant Tejon Ranchcorp

EXHIBIT A

I. DEFINITIONS

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

1. "NOTICING PARTY" or "Tejon" means TEJON RANCHCORP.
2. "DEPONENT" or "YOU" or "YOUR" means the deponent as set forth in the notice.
3. "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.

II. DOCUMENTS TO BE PRODUCED

You are required to produce, at the date, time and location so noticed, all DOCUMENTS described below. This demand relates not only to all DOCUMENTS under your possession, custody or control, but also those DOCUMENTS reasonably available to you.

1. 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 litigation.
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 proceeding.
6. All books, articles, treatises, reports, or other DOCUMENTS, which in any way form the basis for any opinion, conclusion, or analysis of the DEPONENT relating to the subject of his opinion.

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

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

5 9. YOUR entire file concerning YOUR opinion in this proceeding.

6 C:\WPDATA\WCK\Tejon Ranch\Sheahan Depo Notice.wpd