

William C. Kuhs, State Bar No. 39217
Robert G. Kuhs, State Bar No. 160291
Kuhs & Parker
P. O. Box 2205
1200 Truxtun Avenue, Suite 200
Bakersfield, CA 93303
Telephone: (661) 322-4004
Facsimile: (661) 322-2906
E-Mail: wck@kuhsparkerlaw.com
rgkuhs@kuhsparkerlaw.com

Attorneys for 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)	PRE-TRIAL CONFERENCE
California, County of Los Angeles, Case No. BC)	STATEMENT OF TEJON
325201;)	RANCHCORP
)	
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: December 15, 2010
)	Time: 9:00 a.m.
Wm. Bolthouse Farms, Inc. v. City of Lancaster,)	Dept: 1 (Los Angeles)
Diamond Farming Co. v. Lancaster, Diamond)	
Farming Co. v. Palmdale Water Dist., Superior)	
Court of California, County of Riverside, Case)	Phase Three Trial: January 4, 2011
No. RIC 353 840, RIC 344 436, RIC 344 668)	
)	

TEJON RANCHCORP (Tejon) submits the following Pre-Trial Conference Statement for
the Phase Three Trial.

A. Anticipated Witnesses.

Tejon anticipates calling E. John List, Phd, P.E., in its case in chief. Tejon anticipates that Dr. List will testify that the portion of the Antelope Valley Area of Adjudication lying westerly of the Bedrock Ridge and southerly of the Willow Springs Fault (West Antelope Valley Basin or WAVB) is not in overdraft, there is no evidence to suggest that it has ever been in sustained overdraft, and since at least 1985 the groundwater levels in the WAVB have been rising. Dr. List may also testify as to the correctness of any opinions expressed by other testifying experts, including the validity of data, assumptions, conclusions, or reliance on the opinions of non-testifying experts, as such opinions relate to the WAVB. Dr. List's testimony on direct examination should take approximately four hours.

Tejon may also call one or more experts whose opinions have been relied upon by any testifying experts.

Dated: December 13, 2010

KUHS & PARKER

By /s/ Robert G. Kuhs
Robert G. Kuhs, Attorney for
Tejon

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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 December 13, 2010, I caused the foregoing document(s) described as **PRE-TRIAL CONFERENCE STATEMENT OF TEJON RANCHCORP** 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 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