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12 [See Next Page For Additional Counsel]

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

15 **ANTELOPE VALLEY GROUNDWATER**  
16 **CASES**

17 **Included Actions:**

18 Los Angeles County Waterworks District No. 40  
19 v. Diamond Farming Co., Superior Court of  
20 California, County of Los Angeles, Case No. BC  
21 325201;

22 Los Angeles County Waterworks District No. 40  
23 v. Diamond Farming Co., Superior Court of  
24 California, County of Kern, Case No. S-1500-CV-  
25 254-348;

26 Wm. Bolthouse Farms, Inc. v. City of Lancaster,  
27 Diamond Farming Co. v. Lancaster, Diamond  
28 Farming Co. v. Palmdale Water Dist., Superior  
Court of California, County of Riverside, Case  
No. RIC 353 840, RIC 344 436, RIC 344 668

Judicial Council Coordination No. 4408

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

**NOTICE OF DEPOSITIONS AND  
REQUEST FOR PRODUCTION OF  
DOCUMENTS OF UNITED STATES'  
WITNESSES**

Place: Veritext  
707 Wilshire Boulevard, Suite 3500  
Los Angeles, CA 90017

Phase 4 Trial Date: May 28, 2013

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15 Little Rock Sand and Gravel, Inc.  
16 Littlerock Aggregate Co., Inc. dba Antelope Valley Aggregate, Inc.  
17 A.C. Warnack, as Trustee of The A.C. Warnack Trust  
18 A. V. Materials, Inc.  
19 The George and Charlene Lane Family Trust  
20 Holliday Rock Co., Inc.

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Attorneys for Landinv, Inc.

The parties listed below ("NOTICING PARTIES") give notice as follows:

## I. NOTICE OF DEPOSITION

The NOTICING PARTIES will take the deposition of the following expert witnesses (the "DEPONENTS") of the witnesses listed below at VERITEXT, 707 WILSHIRE BOULEVARD, SUITE 3500 LOS ANGELES, CA 90017, 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>
June A. Oberdorfer	February 26, 2013	9:30 a.m.
Jerry Boetch	February 26, 2013	1:00 p.m.
Gen. Michael T. Brewer	March 6, 2013	9:30 a.m.
Gene F. Cummins	March 7, 2013	9:30 a.m.
Jared E. Scott	March 7, 2013	1:00 p.m.
Rand F. Herbert	March 12, 2013	9:30 a.m.
Richard Hallion	March 13, 2013	9:30 a.m.
James E. Judkins	March 22, 2013	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:

- "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

1 matters, whether stored in written, electronic, magnetic or photographic format or by any other  
2 means.

3 3. "EAFB" means Edwards Air Force Base, its employees, agents and  
4 representatives.

5 **B. DOCUMENTS AND THINGS TO BE PRODUCED**

6 The DEPONENT is required to produce, at the date, time and location so noticed, all  
7 DOCUMENTS described below. This demand relates not only to all DOCUMENTS under the  
8 DEPONENT's possession, custody or control, but also those DOCUMENTS reasonably  
9 available to the DEPONENT.  
10

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

13 2. All preliminary, draft and final DOCUMENTS prepared by or on behalf of the  
14 DEPONENT which in any way pertain to the DEPONENT's review, analysis, opinions,  
15 conclusions, or beliefs regarding the subject matter of the Phase 4 trial.  
16

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

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

21 5. All photographs, video tapes, or other recordings which pertain to the  
22 DEPONENT's opinion in the Phase 4 trial.

23 6. All books, articles, treatises, reports, journals or other DOCUMENTS, which the  
24 DEPONENT reviewed, considered or relied upon as the basis for any opinion, conclusion, or  
25 analysis of the DEPONENT.  
26  
27  
28

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

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

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

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

8           11.    All DOCUMENTS evidencing any communication with any attorney for the  
9 United States regarding the subject matter of this proceeding.

10          12.    All DOCUMENTS evidencing any communication with any evidence for the  
11 United States regarding the subject matter of this proceeding.

12          13.    All DOCUMENTS evidencing or relating to the production of water by the  
13 United States or any department thereof, within the Antelope Valley Area of Adjudication.

14          14.    All DOCUMENTS, including maps, drawings, plans and the like showing the  
15 location of well locations, past and present, for EAFB and Plant 42.

16          15.    All DOCUMENTS, including maps, drawings, plans and the like showing the  
17 water distribution systems, past and present, for EAFB and Plant 42.

18          16.    All DOCUMENTS evidencing water production and use necessary to the War  
19 Department's use of land within the AVAA for a bombing and gunnery range under Executive  
20 Order 6588.

21          17.    All DOCUMENTS evidencing water production and use necessary to the War  
22 Department's use of land within the AVAA for a bombing and gunnery range under Executive  
23 Order 8450.

18. All DOCUMENTS evidencing water production and use necessary to the Department of Air Force's use of land within the AVAA in connection with an air force base under Public Land Order 613.

19. All DOCUMENTS evidencing water production and use necessary to the Department of Air Force's use of land within the AVAA in connection with an air force base under Public Land Order 646.

20. All DOCUMENTS evidencing water production and use necessary to the use of land within the AVAA for military purposes in connection with Edwards Air Force Base under Public Land Order 1126.

21. All DOCUMENTS, including reports, testing, memorandum and the like that mention, discuss or refer to groundwater contamination underlying EAFB.

22. All DOCUMENTS, including reports, testing, memorandum and the like that mention, discuss or refer to groundwater quality underlying EAFB.

23. All DOCUMENTS, including reports, testing, memorandum and the like that mention, discuss or refer to or otherwise evidence recommendations received by EAFB to reduce groundwater production at EAFB.


24. All water management plans for EAFB.

25. All DOCUMENTS the evidence future water demand at EAFB and Plant 42.

26. All DOCUMENTS that evidence future plans for expansion of EAFB and Plant 42.

Dated: February 22, 2013

KUHS & PARKER

By   
Robert G. Kuhs, Attorney on behalf of the  
Noticing Parties