

1 Robert G. Kuhs, SBN 160291  
2 Bernard C. Barmann, Jr., SBN 149890  
3 Kuhs & Parker  
4 P. O. Box 2205  
5 1200 Truxtun Avenue, Suite 200  
6 Bakersfield, CA 93303  
7 Tel: (661) 322-4004  
8 Fax: (661) 322-2906  
9 [rgkuhs@kuhsparkerlaw.com](mailto:rgkuhs@kuhsparkerlaw.com)

10 Attorneys for Tejon Ranchcorp and Tejon Ranch Company  
11 Granite Construction Company

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

**AMENDED NOTICE OF  
DEPOSITION AND REQUEST FOR  
PRODUCTION OF DOCUMENTS  
OF UNITED STATES' WITNESS**

Date: March 21, 2013

Time: 9:30 a.m.

Place: Veritext

707 Wilshire Boulevard, Suite 3500  
Los Angeles, CA 90017

Phase 4 Trial Date: May 28, 2013

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Alexis Stevens  
Herum Crabtree  
5757 Pacific Avenue, Suite 222  
Stockton, CA 95207  
Tel: (209) 472-7700  
Fax: (209) 472-7986  
[astevens@herumcrabtree.com](mailto:astevens@herumcrabtree.com)  
Attorneys for Antelope Valley Water Storage LLC

James Lewis  
Taylor & Ring  
10900 Wilshire Blvd., Suite 920  
Los Angeles, CA 90024  
Tel: (310) 209-4100  
Fax: (310) 208-505  
[lewis@taylorring.com](mailto:lewis@taylorring.com)  
Attorneys for The Frank and Yvonne Lane Family Trust, Dated March 5, 1993 as Restated July 20, 2000  
Little Rock Sand and Gravel, Inc.  
Littlerock Aggregate Co., Inc. dba Antelope Valley Aggregate, Inc.  
A.C. Warnack, as Trustee of The A.C. Warnack Trust  
A. V. Materials, Inc.  
The George and Charlene Lane Family Trust  
Holliday Rock Co., Inc.

Michael Fife  
Brownstein Hyatt Farber Schreck LLP  
21 E. Carrillo Street  
Santa Barbara, CA 93101  
Tel: 805-963-7000  
Fax: 805-965-4333  
[mfife@bhfs.com](mailto:mfife@bhfs.com)  
Attorneys for Antelope Valley Ground Water Agreement Association

Ryan Bezerra  
Bartkiewicz Kronick & Shanahan, a professional corporation  
1011 Twenty Second Street  
Sacramento, CA 95816  
Tel: (916) 446-4254  
Fax: (916) 446-4018  
[rsb@bkslawfirm.com](mailto:rsb@bkslawfirm.com)  
Attorneys for Copa De Oro Land Company, a California general partnership

1  
2 Bob Joyce  
3 LeBeau-Thelen, LLP  
4 5001 E. Commercenter Drive, Suite 300  
5 Bakersfield, CA 93309  
6 Tel: 661-325-8962  
7 Fax: 661-325-1127  
8 [bjoyce@lebeauthelen.com](mailto:bjoyce@lebeauthelen.com)  
9 Attorneys for Grimmway Enterprises, Inc.  
10 Diamond Farming Company  
11 Crystal Organic Farms LLC

12 William Sloan  
13 Morrison & Foerster LLP  
14 425 Market Street  
15 San Francisco, California 94105  
16 Tel: (415) 268-7209  
17 Fax: (415) 276-7522  
18 [wsloan@mofo.com](mailto:wsloan@mofo.com)  
19 Attorneys for U.S. Borax, Inc.

20 Richard G. Zimmer  
21 Clifford & Brown  
22 1430 Truxtun Avenue, Suite 900  
23 Bakersfield, CA 93301  
24 Tel: 661-322-6023  
25 Fax: 661-322-3508  
26 [vstreet@clifford-brownlaw.com](mailto:vstreet@clifford-brownlaw.com)  
27 Attorneys for Bolthouse Properties, LLC.  
28 Wm. Bolthouse Farms, Inc.

Theodore Chester  
Smiland & Chester  
601 West Fifth Street, Suite 700  
Los Angeles, CA 90071  
Tel: 213-891-1010  
Fax: 213-891-1414  
[tchester@smilandlaw.com](mailto:tchester@smilandlaw.com)  
Attorneys for Landinv, Inc.

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

## I. NOTICE OF DEPOSITION

The NOTICING PARTIES will take the deposition of the following expert witness (the "DEPONENT") 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>
James E. Judkins	Old March 22, 2013	9:30 a.m.
	New March 21, 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 matters, whether stored in written, electronic, magnetic or photographic format or by any other means.
- "EAFB" means Edwards Air Force Base, its employees, agents and representatives.

### 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

1 DEPONENT's possession, custody or control, but also those DOCUMENTS reasonably  
2 available to the DEPONENT.

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

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

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

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

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

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

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

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

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

22 10. All electronic files and software reviewed, considered or relied upon by the  
23 DEPONENT in reaching any opinion.  
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1           11. All DOCUMENTS evidencing any communication with any attorney for the  
2 United States regarding the subject matter of this proceeding.

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

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

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

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

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

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

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

20           19. All DOCUMENTS evidencing water production and use necessary to the  
21 Department of Air Force's use of land within the AVAA in connection with an air force base  
22 under Public Land Order 646.  
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1           20.    All DOCUMENTS evidencing water production and use necessary to the use of  
2 land within the AVAA for military purposes in connection with Edwards Air Force Base under  
3 Public Land Order 1126.

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

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

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


11           24.    All water management plans for EAFB.

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

13           26.    All DOCUMENTS that evidence future plans for expansion of EAFB and Plant  
14  
15 42.

16  
17 Dated: March 15, 2013

KUHS & PARKER

18  
19 By   
20 Robert G. Kuhs, Attorney on behalf of the  
21 Noticing Parties

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F:\1291.01 - Tejon Ranch - Antelope Valley\Deposition Notices\Phase 4 Trial\Amended Depo Notice\United State's Expert Judkins.docx