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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES - CENTRAL DISTRICT

**ANTELOPE VALLEY GROUNDWATER
CASES**

Included Actions:

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

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;

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, 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

**TEJON RANCHCORP AND TEJON
RANCH COMPANY'S WITNESS
AND EXHIBIT LIST FOR TRIAL
AND PROVE-UP OF THE
STIPULATED JUDGMENT AND
PHYSICAL SOLUTION**

TRIAL DATE: August 3, 2015

TIME: TBD

DEPT.: TBA

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

I. INTRODUCTION

PLEASE TAKE NOTICE that in accordance with Court's Case Management Order dated
March 27, 2015 TEJON RANCHCORP and TEJON RANCH COMPANY (**Tejon**) hereby

discloses the following potential witnesses and exhibits regarding the next phase of trial, and in support of the Stipulated Judgment and Physical Solution.

II. WITNESSES

Tejon may call one or more of the following witnesses in its case-in-chief.

1. **David H. Peterson**, CEG, CHG – Non-Retained AVEK witness who is expected to testify to the reasonable and beneficial use of water by Tejon and the other Stipulating Parties.
2. **Robert Wagner** and/or **Charles W. Binder** - Non-Retained AVEK witness who are expected to testify in support of the [Proposed] Judgment & Physical Solution.
3. **Robert G. Beeby** – Non-Retained PWS witness who is expected to testify to the reasonable and beneficial use of water by Tejon and other Stipulating Parties.
4. **Dr. Dennis Williams** – Non-Retained PWS witness who is expected to testify in support of the [Proposed] Judgment & Physical Solution.
5. **Dan Flory**, AVEK General Manager who is expected to testify to the sale and delivery of imported water to Tejon.
6. **Dennis Atkinson**, Vice President of Agricultural Operations for Tejon who may be called to testify to Tejon's imported water supplies, return flows, and the reasonable and beneficial use of water by Tejon.
7. **Leah Metzger** who maybe called to testify to Tejon's land ownership.

The above list does not include any witnesses to be called for rebuttal and impeachment.

Tejon reserves the right to supplement or add to this list of witnesses as necessary.

III. EXHIBITS

In support of its claim, Tejon may also introduce the following Exhibits:

<u>EXHIBIT</u>	<u>DESCRIPTION</u>
Tejon-1	Declaration of Dennis Atkinson in Lieu of Testimony for Phase 4 Trial with supporting exhibits.
Tejon-2	Declaration of Leah Metzger in Lieu of Testimony for Phase 4 Trial with supporting exhibits. (#6003)
Tejon-3	Revised Stipulation for Phase 4 Trial Regarding Land Ownership and Water Use on Tejon Property
Tejon-4	Tejon Ranch Company and Tejon Ranchcorp's Response to Discovery Order for Phase 4 Trial
Tejon-5	Transcript 429, dated February 12, 1857 in the Matter of <i>Jose Maria Flores v. United States</i> , Land Case No. 170
Tejon-6	Field Notes of Survey of Rancho La Liebre and Plat
Tejon-7	List of Parcels within AVAA by Tax Number
Tejon-8	Map – Tejon Ownership History
Tejon-9	Rancho La Liebre Land Claim Patent recorded in Book 1, Page 535 of Patents, Los Angeles County Records
Tejon-10	Rancho La Liebre Land Claim Patent recorded in Book 18, Page 278 of Patents, Kern County Official Records
Tejon-11	1937 Quitclaim Deed to TRC recorded in Book 14693, Page 67 of L.A. County Official Records
Tejon-12	1937 Quitclaim Deed recorded in Book 683, Page 11 of Kern County Official Records

Tejon-13	1946 Grant Deed to Tejon Ranch, L. A. County O.R. Document No. 146017012
Tejon-14	1952 Grant Deed to Tejon Ranch recorded in Book 1990, Page 262, Kern County Official Records
Tejon-15	1953 Grant Deed to Tejon Ranch recorded in Book 2154, Page 292, Kern County Official Records
Tejon-16	1976 Parcel Map Waiver and Certificate of Compliance recorded as Document No. 4067 in Los Angeles County Official Records
Tejon-17	2007 Grant Deed to Tejon Ranchcorp recorded in L.A. County Official Records, Document No. 20070256642
Tejon-18	Plat – Tejon Water Bank and surrounding facilities
Tejon-19	Plat – Tejon center pivot irrigation system
Tejon-20	AVEK Water Sales Records
Tejon-21	Irrigation Water Service Agreement Between Antelope Valley-East Kern Water Agency and Tejon Ranch Co. for Water Service dated 4-22-75
Tejon-22	Water Service Agreement Between Antelope Valley-East Kern Water Agency and Tejon Ranch Co. for Water Service dated January 6, 1976
Tejon-23	MOU dated 9-23-2008 between AVEK and Tejon re: 8,393 acre-feet of Nickel Water
Tejon-24	MOU dated 1-13-2009 between AVEK and Tejon re: 6,393 acre-feet of Nickel Water
Tejon-25	Agreement between AVEK and Tejon Providing for Importation of Additional SWP Table A Amounts dated 10-25-12
Tejon-26	Agreement Affecting Water Supply dated 7-22-13 Between Dudley Ridge WD, Utica North and Tejon
Tejon-27	Agreement Affecting Water Supply dated 7-22-13 Between Dudley Ridge WD and Tejon
Tejon-28	Amendment No. 23 to the Water Supply Contract Between the State of California Department of Water Resources and Antelope Valley-East Kern Water Agency and Amendment No. 24 to the Water Supply Contract Between the State of California Department of Water Resources

	and Antelope Valley-East Kern Water Agency
Tejon-29	Amendment No. 24 to the Water Supply Contract Between the State of California Department of Water Resources and Antelope Valley-East Kern Water Agency dated 8-21-13
Tejon-30	Amendment No. 27 to the Water Supply Contract Between the State of California Department of Water Resources and Dudley Ridge Water District dated 8-21-13
Tejon-31	Amendment No. 35 to the Water Supply Contract Between the State of California Department of Water Resources and Tulare Lake Basin Water Storage District dated 8-21-13
Tejon-32	Centennial Specific Plan Water Supply Assessment dated May 2011 By Golden Valley MWD
Tejon-33	AVEK Irrigation Deliveries to Tejon
Tejon-34	Tejon Return Flow Summary
Tejon-35	Water Use Records

Dated: April 27, 2015

KUHS & PARKER

By /s/
Robert G. Kuhs, Attorney for Tejon
Ranchcorp and Tejon Ranch Company