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Exempt from filings fees under
Government Code Section 6103

[See Next Page For Additional Counsel]

Attorney for Quartz Hill Water District
Defendant/Cross Complainant

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES-CENTRAL DISTRICT

ANTELOPE VALLEY GROUNDWATER
CASES

**Judicial Council Coordination Proceeding
No. 4408**

Included Actions:

Santa Clara Case No. 1-05-CV-049053
Assigned to the Honorable Jack Komar Dept. I

Los Angeles County Waterworks District No.
40 v. Diamond Farming Co.
Superior Court of California, County of Los
Angeles, Case No. BC325201;

**PUBLIC WATER SUPPLIER NOTICE OF
DEPOSITION**

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. City of Lancaster
Diamond Farming Co. v. Palmdale Water Dist.
Superior Court of California
County of Riverside, consolidated actions
Case Nos. RIC 353840, RIC 344436,
RIC 344668.

**Deponent: Thomas E. Harder
Date: 4/3/2013
Time: 9:00 AM**

PUBLIC WATER SUPPLIER NOTICE OF DEPOSITION

Deponent: Thomas E. Harder
Date: 4/3/2013
Time: 9:00 AM

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PUBLIC WATER SUPPLIER NOTICE OF DEPOSITION

Deponent: Thomas E. Harder

Date: 4/3/2013

Time: 9:00 AM

1 TO ALL INTERESTED PARTIES AND THEIR ATTORNEY OF RECORD:

2 PLEASE TAKE NOTICE THAT THE DEPOSITION OF Thomas E. Harder will be taken
3 on 4/3/2013, commencing at 9:00 AM at the offices of Veritext, 707 Wilshire Boulevard, Suite
4 3500, Los Angeles, California, 90017, upon oral examination before a Certified Shorthand
5 Reporter. This noticing party also intends to record the testimony by audio technology, video
6 technology, and the testimony by stenographic method through the instant visual display of the
7 testimony.

8 Said deposition will continue from day to day, excluding Sundays and holidays, until
9 complete.

10 Please note: If an interpreter is needed and/or desired by the deponent, it is requested that
11 the undersigned be notified no later than five (5) days before the date of the deposition.

12
13 YOU ARE FURTHER NOTIFIED THAT:

14 This noticing party intends to reserve the right to use at trial a videotape deposition of this
15 expert. (Code of Civil Procedure § 2025.220(a)(6).)

16
17 YOU ARE FURTHER NOTIFIED THAT:

18 The deponent is required to produce the following documents, records, or other materials
19 at the deposition:

20
21 **DEFINITIONS**

22 “BASIN” BASIN shall be defined as on and below the ground surface within the
23 jurisdictional area defined by the court in this matter by order dated March 16, 2007.

24 “DOCUMENT” shall be defined as and have the same broad meaning as it has in
25 California Evidence Code § 250 and Code of Civil Procedure §2031.010 et seq. and includes
26 documents, papers, books, accounts, letters, records, photographs, objects, and all other tangible
27 things. It includes all forms of written communication. It specifically includes all originals,

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copies, duplicates, drafts, or other recordings of any written, graphic, or otherwise recorded matter, however produced or reproduced, whether inscribed by hand or by mechanical, electronic, microfilm, photographic, phonic, or any other means. It includes abstracts; address books; advertisements; affidavits or statements; agreements; analyses of any kind; appointment books; architectural blueprints or drawings; balance sheets; bids; billings; blueprints; books or records of account; purchase orders; work papers; brochures; bulletins; calendars; charts; checks and canceled checks; circulars; compilations; computer cards, runs, and printouts; computer programs; computer tapes and discs; consultants' reports or studies; contracts; correspondence; data processing input and output; data sheets; desk calendars; diagrams; diaries; directories; discs; drawings; estimates; expense account records; experts' reports or studies; financial statements or calculations; graphs; house publications; income statements; inspection records, sheets, and reports; interoffice and intra-office communications; invoices; job descriptions or assignments; journals; layouts; ledgers; letters; licenses; lists; magnetic tapes; manuals; maps; memorandums of any kind; microfiche; microfilm; minutes or records of any kind; movies; notations; notes; notebooks; opinions; organizational charts; pamphlets; permits; photographs; pictures; plans; projections; promotional materials; press releases or clippings; publications; punch cards; procedures; questionnaires and answers to them; quotations; records and recordings of any kind; renderings; reports of any kind; rework instructions, orders, and procedures; routing slips; schedules; sound recordings; specifications; statistical analyses; stenographers' notebooks; studies of any kind, analyses, forecasts, and evaluations; subcontracts; summaries; surveys; tables, indices, and lists; tabulations; tallies; tapes; telegrams; cables; telephone messages, telephone logs, and telephone billings and statements; teletype and telex messages; trade letters; transcripts, minutes, reports, and recordings of telephone or other conversations, interviews, conferences, committee meetings, or other meetings; undertakings; video tapes; vouchers; and working drawings, papers, and files.

PUBLIC WATER SUPPLIER NOTICE OF DEPOSITION

Deponent: Thomas E. Harder

Date: 4/3/2013

Time: 9:00 AM

1 “YOU” or “YOUR” shall mean Thomas E. Harder, and shall also include all
2 representatives and agents of Thomas E. Harder, predecessors or successors in interest, and all
3 other PERSONS acting or purporting to act on behalf of respondent to this notice.

4
5 **REQUESTS FOR PRODUCTION**
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7 **Request for Production Number 1.**

8 All DOCUMENTS that refer or relate to any opinions YOU intend to offer at the trial of this
9 matter, including but not limited to all DOCUMENTS or WRITINGS YOU reviewed in
10 connection with forming YOUR opinions, or in any way considered or relied upon in forming any
11 opinions YOU intend to offer at trial.

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13 **Request for Production Number 2.**

14 All DOCUMENTS that refer or relate to YOUR opinions regarding the groundwater pumping by
15 any party to this case.

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17 **Request for Production Number 3.**

18 All DOCUMENTS that refer or relate to YOUR opinions regarding the reasonable and beneficial
19 use of water by any party to this case.

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21 **Request for Production Number 4.**

22 All reports and written analyses YOU prepared in connection with YOUR work as an expert in
23 this matter.

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25 **Request for Production Number 5.**

26 All DOCUMENTS that evidence the work YOU have performed in forming YOUR opinions in
27 this case, including but not limited to invoices, time records and billing statements.

Request for Production Number 6.

YOUR current curriculum vitae ("C.V."), and all C.V.s YOU have prepared in the last 5 years.

Request for Production Number 7.

All DOCUMENTS that refer or relate to any communications YOU have had with the party that designated YOU and/or their current or former attorneys regarding YOUR work as an expert in this case and/or the opinions YOU have formed.

Request for Production Number 8.

All DOCUMENTS or WRITINGS that refer or relate to any communications YOU have had with any person regarding YOUR work as an expert in this case and/or the opinions YOU have formed.

Request for Production Number 9.

All deposition, trial, arbitration and/or hearing transcripts in YOUR possession, custody or control, wherein, YOU have previously testified as an expert witness in any legal proceeding or deposition.

Request for Production Number 10.

All DOCUMENTS or WRITINGS that refer or relate to YOUR expected testimony at trial, including, but not limited to, agricultural practices, distribution of crops and their water use, irrigation methods, return flows from agricultural practices, mineral extraction, and mineral production.

Request for Production Number 11.

YOUR agreement with the party that designated YOU and/or any other party or their attorney in this case.

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Request for Production Number 12.

All drafts YOU prepared or that were prepared at YOUR direction that relate to YOUR opinions in this case.

Request for Production Number 13.

All communications between YOU and any other party or attorney in this case.

Request for Production Number 14.

All communications between another party or attorney in this case.

Request for Production Number 15.

All DOCUMENTS that relate to any other party or attorney in this case.

Request for Production Number 16.

All DOCUMENTS that relate to this case.

Request for Production Number 17.

All reference materials YOU used to formulate YOUR opinions in this case.

Request for Production Number 18.

All opinions that relate the adjudication proceedings.

Request for Production Number 19.

All reports that relate to the adjudication proceedings.

Request for Production Number 20.

All data that is in YOUR possession that relates to the adjudication proceedings in the same electronic format that YOU customarily keep that data.

Dated: March 22, 2013

CHARLTON WEEKS LLP



Bradley T. Weeks

Attorney for Quartz Hill Water District

PROOF OF SERVICE

I am employed in the aforesaid county, State of California; I am over eighteen years of age and not a party to the within action; my business address is 1031 West Avenue M-14, Suite A, Palmdale, California, 93551.

On March 22, 2013, at my place of business at Palmdale, California, a copy of the following DOCUMENT(s):

PUBLIC WATER SUPPLIER NOTICE OF DEPOSITION

Deponent: Thomas E. Harder

Date: 4/3/2013

Time: 9:00 AM

By posting the DOCUMENT listed above to the Santa Clara Superior Court website in regard to the Antelope Valley Groundwater Matter. All parties listed on the Santa Clara Superior Court in regard to the Antelope Valley Groundwater Matter are hereby incorporated here at by this reference.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on March 22, 2013



Bradley T. Weeks