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Attorneys for Landinv, Inc.

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

Coordination Proceeding Special Title
(Rule 1550 (b))

**ANTELOPE VALLEY GROUNDWATER
CASES**

Included **CONSOLIDATED** Actions:

Los Angeles County Waterworks District No.
40 vs. Diamond Farming Company
Los Angeles Superior Court Case No.
BC325201

Los Angeles County Waterworks District No.
40 vs. Diamond Farming Company
Kern County Superior Court Case No. S-
1500-CV-254348 NFT

Diamond Farming Company vs. City of
Lancaster
Riverside County Superior Court Lead Case
No. RIC 344436 [Consolidated w/ Case Nos.
344668 & 353840]

Willis v. Los Angeles County Waterworks
District No. 40; Los Angeles Superior Court
Case No. BC 364553

Wood v. Los Angeles County Waterworks
District No. 40; Los Angeles Superior Court
Case No. BC 391869

Judicial Council Coordination No. 4408
[Assigned to Hon. Jack Komar; Dept 4408]

Santa Clara Case No.: 1-05-CV-049053

**LANDVINV, INC.'S DESIGNATION OF
NON-EXPERT WITNESSES PURSUANT
TO CASE MANAGEMENT ORDER**

Date of Exchange: February 4, 2013
Trial Date: February 11, 2013

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 **NOTICE IS HEREBY GIVEN** that pursuant to Paragraph 3 of the Court's December
3 12, 2012, Case Management Order, Defendant Landinv, Inc. ("Landinv") designates the
4 following non-expert witnesses:

- 5 1. Carl F. Voss, Jr.;
- 6 2. John Calandri; and
- 7 3. Yogesh Radia.

8 Each of the above-listed witnesses will testify as to the current and historical water usage
9 on Landinv's property.

10 Mr. Voss and Mr. Calandri are represented in this action by attorneys Bob Joyce and
11 Michael Fife, respectively, and will be made available for deposition as specified by such
12 attorneys. Mr. Radia resides in the United Kingdom and his availability for deposition is limited.
13 Any party seeking to depose Mr. Radia should contact the undersigned.

14 Landinv reserves the right to call additional witnesses at trial based on facts and
15 information that become available to it since the date of this designation.

16 Landinv reserves the right to call as expert witnesses any or all of the experts who have
17 been, or may subsequently be, designated by any of the parties to this case. Landinv reserves the
18 right, pursuant to section 2034.280 of the Code of Civil Procedure, to later name other experts
19 before the trial or call to testify at trial experts not named, whose testimony may be utilized to
20 rebut the contentions and testimony of the parties, the parties' experts or other persons or experts
21 that may testify. Landinv reserves the right to call supplemental experts, rebuttal experts and
22 experts to address issues raised by the Court or by other parties in the Phase 4 Trial. Landinv
23 also reserves the right to supplement this designation on non-expert witnesses.

24 Dated: January 4, 2013

SMILAND CHESTER LLP

26 By: /s/ Theodore A. Chester, Jr.
27 Theodore A. Chester, Jr.,
28 Attorneys for Landinv, Inc.

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I, Felicia Herbstreith am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is: 601 West Fifth Street, Suite 1100, Los Angeles, California 90071.

DESIGNATION OF NON-EXPERT WITNESSES PURSUANT TO CASE

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

/s/ Felicia Herbstreith
Felicia Herbstreith