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Attorneys for Defendants and Cross-Defendants
Bruce Burrows and 300 A 40 H, LLC

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

Coordination Proceeding Special Title
(Rule 1550 (b))

Judicial Council Coordination No. 4408
[Assigned to Hon. Jack Komar; Dept 17]

**ANTELOPE VALLEY GROUNDWATER
CASES**

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

Included **CONSOLIDATED** Actions:

**WITNESS AND EXHIBIT LIST OF
BRUCE BURROWS AND 300 A 40H, LLC
FOR PROVE-UP OF THE PROPOSED
STIPULATED JUDGMENT AND
PHYSICAL SOLUTION**

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

Trial Date: August 3, 2015
Time: TBD
Dept.: TBA

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

Pursuant to the Second Amended Case Management Order, Bruce Burrows and 300 A 40H, LLC (“Burrows”) intend to call the following witnesses and present the following Exhibits at the prove-up of the [Proposed] Stipulated Judgment and Physical Solution.

WITNESS LIST

- | | | |
|----|----------------------|--|
| 1. | Bruce Burrows | Claim of reasonable and beneficial use by Burrows |
| 2. | Dennis Atkinson | Claim of reasonable and beneficial use by Burrows |
| 3. | Fredrick J. Koch III | Business Records of Southern California Edison |
| 4. | Dennis Williams | (Non-Retained Expert) Recommendation of the [Proposed Judgment & Physical Solution |
| 5. | Robert G. Beeby | (Non-Retained Expert) Reasonable and beneficial use of water by Stipulating Parties |
| 6. | David Peterson | (Non-Retained Expert) Reasonable and beneficial use of water by Stipulating Parties |
| 7. | Robert Wagner | (Non-Retained Expert) Recommendation of the [Proposed Judgment and Physical Solution |
| 8. | Charles W. Binder | (Non-Retained Expert) Recommendation of the [Proposed Judgment and Physical Solution |

Burrows reserves the right to designate other witnesses, if necessary. Burrows expressly reserves the right to call any of the witnesses identified and/or disclosed by any other party in this lawsuit. Burrows expressly reserves the right to call any witnesses in rebuttal and impeachment, if any.

EXHIBIT LIST

- | | |
|-----------|---|
| Burrows-1 | Declaration of Bruce Burrows; |
| Burrows-2 | Supplemental Declaration of Bruce Burrows; |
| Burrows-3 | Second Supplemental Declaration of Bruce Burrows; |
| Burrows-4 | Third Supplemental Declaration of Bruce Burrows; |

Burrows-5 Bruce Burrows and 300 A 40 H, LLC's Request for Judicial Notice; Declaration
of Theodore A. Chester, Jr.;

Burrows-6 Stipulation for Phase IV Trial Concerning Burrows/300 A 40 H, LLC Water
Pumping for 2011 and 2012;

Burrows-7 Google Earth Images;

Burrows-8 Grant Deeds;

Burrows-9 Memoranda of Lease;

Burrows-10 Appendix D-3: Table 4 Applied Crop Water Duties and Irrigation Efficiency
Values to Summary Expert Report, previously filed in these proceedings;

Burrows-11 Tejon Response to Discovery Order, dated December 21, 2012;

Burrows-12 Tejon Pumping Summary-2002-2008;

Burrows-13 Tejon Pumping Records;

Burrows-14 Burrows Pumping Data Summary-2000-2013;

Burrows-15 Burrows Summary Statement.

Dated: April 27, 2015

Respectfully submitted

SMILAND CHESTER ALDEN LLP

By /s/ Theodore A. Chester, Jr.
Theodore A. Chester, Jr.

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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: 140 South Lake Avenue, Suite 274, Pasadena, California 91101.

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