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Attorneys for Cross-Complainant  
Phelan Piñon Hills Community Services District

EXEMPT FROM FILING FEES UNDER  
GOVERNMENT CODE § 6103

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES - CENTRAL DISTRICT

Coordination Proceeding  
Special Title (Rule 1550(b))

**ANTELOPE VALLEY  
GROUNDWATER CASES**

Included Actions:

*Los Angeles County Waterworks District  
No. 40 v.  
Diamond Farming Co., et al.,  
Los Angeles County Superior Court, Case  
No. BC 325 201*

*Los Angeles County Waterworks District  
No. 40 v.  
Diamond Farming Co., et al.,  
Kern County Superior Court, 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.  
Riverside County Superior Court,  
Consolidated Action, Case Nos. RIC 353  
840, RIC 344 436, RIC 344 668*

AND RELATED CROSS-ACTIONS

Judicial Council Coordination Proceeding  
No. 4408

For Filing Purposes Only: Santa Clara  
County Case No.: 1-05-CV-049053

Assigned to the Honorable Jack Komar,  
Department 17

EXPERT WITNESS DECLARATION OF  
PHELAN PIÑON HILLS COMMUNITY  
SERVICES DISTRICT

///

1 I, Susan M. Trager, declare:

2 1. I am the attorney of record for Cross-Complainant Phelan Pinon Hills Community  
3 Services District ("PPHCSD") in this action and I have personal knowledge of each fact stated in  
4 this declaration.

5 2. Attached to this declaration as Exhibit A is a list of the expert witnesses whose  
6 testimony PPHCSD intends to offer at trial, either orally or by deposition testimony. This list  
7 includes Thomas Harder, to whom this declaration refers.

8 3. The expert named has agreed to testify as an expert witness at trial.

9 4. Attached to this declaration as Exhibit B is a resume of the professional qualifications  
10 of Thomas Harder.

11 5. I am informed and believe and thereon state that Thomas Harder is an expert in the  
12 field of Hydrogeology and that his qualifications in this field are as follows: Mr. Harder is a  
13 California registered Professional Geologist and California Certified Hydrogeologist with more  
14 than 20 years of experience in groundwater hydrology and groundwater resource management.  
15 He holds a bachelor's degree in geology from California State Polytechnic University, Pomona  
16 and a master's degree in geology (hydrogeology emphasis) from California State University, Los  
17 Angeles. His specific areas of expertise include groundwater basin analysis, perennial yield,  
18 groundwater flow, artificial recharge, groundwater development, water well design, stratigraphic  
19 analysis, water/rock interactions, and contaminant hydrogeology.

20 6. Mr. Harder will testify regarding the hydrogeological setting of the PPHCSD service  
21 area, groundwater extractions from the proposed Antelope Valley Area of Adjudication by the  
22 PPHCSD via Well 14 and the effects of pumping from Well 14 and other PPHCSD wells on  
23 groundwater levels and groundwater flow in the proposed Antelope Valley Area of adjudication.  
24 A copy of Mr. Harder's report is attached as Exhibit C.

25 7. Mr. Harder is sufficiently familiar with the pending action to submit a meaningful oral  
26 deposition concerning this testimony, including his expert opinion and the basis of his opinion.

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1 8. Mr. Harder's fee for providing deposition testimony and for consulting with the  
2 retaining attorney are \$300.00 per hour, plus travel expenses and subsistence, with an 8 hour  
3 minimum. Mr. Harder's fee schedule is attached as Exhibit D.

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

6  
7 Dated: July 13, 2010

SmithTrager LLP

8  
9 By *Susan M. Trager*  
10 Susan M. Trager  
11 Attorneys for Defendant and Cross-  
12 Complainant Phelan Piñon Hills  
13 Community Services District  
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