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SHADOW MOUNTAIN RANCH, LLC

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF RIVERSIDE

Coordination Proceeding Special Title
(Cal. Rules Of Court, rule 3.550)

MOJAVE BASIN WATER CASES

THE MOJAVE WATER AGENCY, AS THE MOJAVE BASIN AREA WATERMASTER,

Plaintiff,

v.

All persons who are not presently parties to the comprehensive groundwater adjudication in *City of Barstow, et al., v. City of Adelanto, et al.*, Riverside Superior Court Case No. CIV208568, and are either producing more than 10 acre-feet of Basin groundwater annually, or using Basin groundwater for unlawful purposes, and Does 1 through 2,000,

Defendants.

SHADOW MOUNTAIN RANCH, LLC,

Cross-Complainant,

v.

MOJAVE WATER AGENCY, The Fasoja Living Trust, Buddhist-Town LLC, S.E. Combined Services of California, Inc., Shunxing Weng, and Roes 1 through 10,

Cross-Defendants.

JCCP5265
CIV208568 (Lead Case Number)
Coordinated with Case No. CIVSB2218461

Dept. 1, Riverside Superior Court
Hon. Harold W. Hopp, Judge Presiding

SHADOW MOUNTAIN RANCH, LLC'S DEMAND FOR EXCHANGE OF EXPERT WITNESS INFORMATION

Action Filed: May 30, 1990
Amended Cross-Complaint Filed: June 1, 2026
Trial Date: January 15, 2027

BEST BEST & KRIEGER LLP
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TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Pursuant to Chapter 18 of the Civil Discovery Act and Code of Civil Procedure sections 2034.210, 2034.230, and 2034.260, Defendant and Cross-Complainant Shadow Mountain Ranch, LLC ("SMR") hereby demands that all parties simultaneously exchange the following written information concerning each other's expert trial witnesses for the first phase of trial on January 15, 2027, as required by sections 2034.210, 2034.230, and 2034.260. Said exchange will occur on **November 30, 2026**, at the Los Angeles office of Best Best & Krieger, LLP, located at 300 South Grand Avenue, 25th Floor, Los Angeles, CA 90071, or by a mailing or electronic delivery on or before said date.

The exchange shall include a written list, containing the name and address of any natural person, including one who is a party, whose oral or deposition testimony in the form of an expert opinion any party expects to offer in evidence at trial. In the alternative, the exchange shall include a statement that the responding party does not presently intend to offer the testimony of any expert witness.

If any expert witness on the list to be exchanged is a party, an employee of a party, or has been retained by a party for the purpose of forming or expressing an opinion in anticipation of the litigation or in preparation for the trial of this action, the designation of that witness shall include or be accompanied by an expert witness declaration in accordance with Code of Civil Procedure section 2034.260. The declaration shall be under penalty of perjury and shall contain:

A brief narrative statement of the qualifications of the expert;

A brief narrative statement of the general substance of the testimony that the expert is expected to give;

A representation that the expert has agreed to testify at the trial;

A representation that the expert will be sufficiently familiar with the pending action to submit to a meaningful oral deposition concerning the specific testimony, including any opinion and its basis that the expert is expected to give at trial; and

A statement of the expert's hourly and daily fee for providing deposition testimony and for consulting with the retaining attorney.

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ONTARIO, CALIFORNIA 91761

Pursuant to Code of Civil Procedure sections 2034.210 and 2034.270, each party is also required to produce for inspection and copying at the time and place of exchange stated above, all discoverable reports and writings, if any, made by any expert described in Code of Civil Procedure section 2034.210 in the course of preparing that expert's opinion. This production includes, but is not limited to, all files, notes, communications, documents, draft reports, and emails prepared by, exchanged with, received by, or from a designated expert and any other person including legal counsel.

Dated: October 29, 2026

BEST BEST & KRIEGER LLP

By: _____

ERIC L. GARNER
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PROOF OF SERVICE

I, Vanessa Guillen-Becerra, declare:

I am a citizen of the United States and employed in San Bernardino County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 2855 E. Guasti Road, Suite 400, Ontario, California 91761. On October 29, 2026, I served a copy of the within document(s):

SHADOW MOUNTAIN RANCH LLC'S DEMAND FOR EXCHANGE OF EXPERT WITNESS INFORMATION

☒ by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, the United States mail at Ontario, California addressed as set forth below.

☒ by transmitting via e-mail or electronic transmission the document(s) listed above to the person(s) at the e-mail address(es) set forth below.

Please see attached Service List.

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

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

Executed on October 29, 2026, at Ontario, California.

Vanessa Guillen-Becerra

Service List

In re The Mojave Water Agency, as the Mojave Basin Area Watermaster v. All Persons Who are not parties to the comprehensive groundwater adjudication in the *City of Barstow, et al. v. City of Adelanto, et al., Riverside* Superior Court Case No. CIV208568, and are either producing more than 10 acre-feet of Basin groundwater annually, or using Basin groundwater for unlawful purposes, and Does 1 through 2,000

Riverside Superior Court Case No.: CIVSB 2218461 (transferred)
Mojave Basin Water Cases JCCP5265

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