

1 OFFICE OF THE GENERAL COUNSEL
JILL A. TRACY (State Bar No. 182136)
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San Diego, California 92101
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5 Attorneys for Designated Party
SAN DIEGO GAS & ELECTRIC COMPANY

8 CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
9 SAN DIEGO REGION

10 In the matter of Tentative Cleanup and
11 Abatement Order No. R9-2010-0002
12 (Shipyard Sediment Cleanup)

**DESIGNATED PARTY SAN
DIEGO GAS & ELECTRIC
COMPANY'S COUNTER-
DESIGNATIONS OF EXPERT
AND NON-EXPERT WITNESSES**

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1 PLEASE TAKE NOTICE that, pursuant to the San Diego Regional Water Quality
2 Control Board Final Discovery Plan adopted February 18, 2010 in the above-entitled matter, as
3 amended by the Ruling on Cleanup Team's Motion to Extend Remaining Discovery Deadlines
4 and Related Matters Addressed at Prehearing Conference, dated July 16, 2010 ("Final Discovery
5 Plan"), Designated Party San Diego Gas & Electric Company ("SDG&E") hereby counter-
6 designates the following expert and non-expert witnesses who may provide expert or non-expert
7 testimony in response to the expert and non-expert witness designations submitted by the
8 Designated Parties, RWQCB and Environmental Groups to RWQCB on July 19, 2010:

9 **Non-Expert Witness Counter-Designations**

- 10 1. Jason Conder, Ph.D., Manager
11 ENVIRON
12 18100 Von Karman Ave., Suite 600
13 Irvine, CA 92612
14 (949) 798-3618

15 **Expert Witnesses Counter-Designations**

- 16 2. No expert witness counter-designations at this time.

17 SDG&E expressly reserves the right to supplement this expert and non-expert
18 witness counter-designation, as provided for in Code of Civil Procedure section 2034.280 and
19 2034.310, as well as any other statutory or common law rights, to later designate additional expert
20 and non-expert witnesses, including experts and non-experts named in counter-designations,
21 before the hearing in this matter, or to call unnamed expert or non-expert witnesses whose
22 testimony is needed to aid in the determination by the RWQCB of cleanup and liability or to
23 refute, impeach, and/or rebut the contentions, testimony, or other evidence offered by the expert
24 and non-expert witnesses proffered by the RWQCB, Designated Parties, or other non-designated
25 party witnesses.

26 Dated: August 2, 2010

OFFICE OF THE GENERAL COUNSEL

By:  for

Jill A. Tracy

Attorneys for Designated Party SAN DIEGO
GAS & ELECTRIC COMPANY

<p>ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): JILL A. TRACY (SBN 182136) OFFICE OF THE GENERAL COUNSEL SAN DIEGO GAS & ELECTRIC COMPANY 101 Ash Street San Diego, CA 92101 TELEPHONE NO.: (619) 699-5112 FAX NO. (Optional): (619) 696-4266 E-MAIL ADDRESS (Optional): jtracy@semprautilities.com ATTORNEY FOR (Name): SAN DIEGO GAS & ELECTRIC COMPANY</p>	<p>FOR COURT USE ONLY</p>
<p>SUPERIOR COURT OF CALIFORNIA, COUNTY OF STREET ADDRESS: CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD MAILING ADDRESS: 9174 SKY PARK COURT, SUITE 100 CITY AND ZIP CODE: SAN DIEGO, CA 92123-4353 BRANCH NAME: SAN DIEGO REGION</p>	
<p>PLAINTIFF/PETITIONER: In the matter of Tentative Cleanup and Abatement Order No. R9-2010-0002 DEFENDANT/RESPONDENT:</p>	<p>CASE NUMBER: CAO No. R9-2010-0002 JUDICIAL OFFICER: DAVID KING, PRESIDING OFFICER</p>
<p>PROOF OF ELECTRONIC SERVICE</p>	<p>DEPT.:</p>

1. I am at least 18 years old and **not a party to this action.**

- a. My residence or business address is (specify): 101 Ash Street, San Diego, CA 92101
- b. My electronic notification address is (specify): nmussachia@semprautilities.com

2. I electronically served the following documents (exact titles): Designated Party San Diego Gas & Electric Company's Counter-Designations of Expert and Non-expert Witnesses

The documents served are listed in an attachment. (Form POS-050(D)/EFS-050(D) may be used for this purpose.)

3. I electronically served the documents listed in 2 as follows:

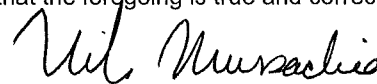
- a. Name of person served:
 On behalf of (name or names of parties represented, if person served is an attorney):
- b. Electronic notification address of person served:
- c. On (date): AUGUST 2, 2010
- d. At (time): 4:50 P.M.

The documents listed in item 2 were served electronically on the persons and in the manner described in an attachment. (Form POS-050(P)/EFS-050(P) may be used for this purpose.)

Date: AUGUST 2, 2010

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

NICOLE MUSSACHIA
 (TYPE OR PRINT NAME OF DECLARANT)

▶ 
 (SIGNATURE OF DECLARANT)

SHORT TITLE: In the matter of Tentative Cleanup and Abatement Order No. R9-2010-0002	CASE NUMBER: CAO No. R9-2010-0002
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ATTACHMENT TO PROOF OF ELECTRONIC SERVICE (PERSONS SERVED)

(This attachment is for use with form POS-050/EFS-050.)

NAMES, ADDRESSES, AND OTHER APPLICABLE INFORMATION ABOUT PERSONS SERVED:

<u>Name of Person Served</u>	<u>Electronic Notification Address</u>	<u>Date and Time of Electronic Service</u>
<i>(If the person served is an attorney, the party or parties represented should also be stated.)</i>		
Catherine Hagan Staff Counsel California Regional Water Board	chagan@waterboards.ca.gov	Date: <u>August 2, 2010</u> Time: <u>4:50 p.m.</u>
Raymond Parra Senior Counsel BAE Systems Ship Repair, Inc.	Raymond.parra@baesystems.com	Date: <u>August 2, 2010</u> Time: <u>4:50 p.m.</u>
Michael McDonough Attorney for BP West Coast Products LLC	Michael.mcdonough@bingham.com	Date: <u>August 2, 2010</u> Time: <u>4:50 p.m.</u>
Christopher McNevin Attorney for Chevron USA, Inc.	chrismcnevin@pillsburylaw.com	Date: <u>August 2, 2010</u> Time: <u>4:50 p.m.</u>
Brian Ledger Attorney for City of San Diego	bledger@gordonrees.com	Date: <u>August 2, 2010</u> Time: <u>4:50 p.m.</u>
Christian Carrigan Senior Staff Counsel, State Water Resources Control Board	ccarrigan@waterboards.ca.gov	Date: <u>August 2, 2010</u> Time: <u>4:50 p.m.</u>
Marco Gonzalez, Attorney for Environmental Health Coalition and San Diego Coastkeeper	marco@coastlawgroup.com	Date: <u>August 2, 2010</u> Time: <u>4:50 p.m.</u>
James Handmacher, Attorney for Marine Construction & Design Co. and Campbell Industries	jvhandmacher@bvmm.com	Date: <u>August 2, 2010</u> Time: <u>4:50 p.m.</u>
Sharon Cloward Executive Director San Diego Port Tenants Assoc.	Sharon@sdpta.com	Date: <u>August 2, 2010</u> Time: <u>4:50 p.m.</u>
Leslie Fitzgerald Deputy Port Attorney San Diego Unified Port District	lfitzger@portofsandiego.org	Date: <u>August 2, 2010</u> Time: <u>4:50 p.m.</u>
Nate Cushman Associate Counsel U.S. Navy	nate.cushman@navy.mil	Date: <u>August 2, 2010</u> Time: <u>4:50 p.m.</u>
Laura Hunter Environmental Health Coalition	laurah@environmentalhealth.org	Date: <u>August 2, 2010</u> Time: <u>4:50 p.m.</u>

SHORT TITLE: In the matter of Tentative Cleanup and Abatement Order No. R9-2010-0002	CASE NUMBER: CAO No. R9-2010-0002
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NAMES, ADDRESSES, AND OTHER APPLICABLE INFORMATION ABOUT PERSONS SERVED:

<u>Name of Person Served</u> <i>(If the person served is an attorney, the party or parties represented should also be stated.)</i>	<u>Electronic Notification Address</u>	<u>Date and Time of Electronic Service</u>
Gabe Solmer Legal Director San Diego Coastkeeper	gabe@sdcoastkeeper.org	Date: <u>August 2, 2010</u> Time: <u>4:50 p.m.</u>
Tom Stahl, AUSA Chief Civil Division Office of the U.S. Attorney	Thomas.stahl@usdoj.gov	Date: <u>August 2, 2010</u> Time: <u>4:50 p.m.</u>
William D. Brown Attorney for San Diego Unified Port District	bbrown@brownandwinters.com	Date: <u>August 2, 2010</u> Time: <u>4:50 p.m.</u>
Kelley E. Richardson Attorney for NASSCO	kelly.richardson@lw.com	Date: <u>August 2, 2010</u> Time: <u>4:50 p.m.</u>
Mike Tracy Attorney for BAE Systems Ship Repair Inc.	Mike.tracy@dlapiper.com	Date: <u>August 2, 2010</u> Time: <u>4:50 p.m.</u>
Sandi Nichols Attorney for San Diego Unified Port District	snichols@allenmatkins.com	Date: <u>August 2, 2010</u> Time: <u>7:10 P.M.</u>
Kristin Reyna Attorney for City of San Diego	kreyna@gordonrees.com	Date: <u>August 2, 2010</u> Time: <u>4:50 p.m.</u>
		Date: _____ Time: _____
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