

Prosecution Team Rebuttal Witness List and Request for Telephonic Appearance

Malaga County Water District

Administrative Civil Liability Complaint R5-2016-0512

21/22 April 2016

The Prosecution Team hereby respectfully requests permission to have the two first witnesses listed here appear telephonically. Mr. Ganter and Mr. Durham are employed and reside outside the state. As the scope of their respective potential testimony is limited solely to the mode of preparation of evidentiary documents, the Prosecution Team believes a telephonic appearance is most appropriate.

The Prosecution Team will call the following rebuttal witnesses as needed. These Rebuttal Witnesses are in addition to those identified in the previously submitted Witness List.

1. Chuck Durham (telephonic appearance as needed)
Principal Engineer and Director of Pretreatment Services, Tetra Tech, Inc.
Testimony regarding 2010 Pretreatment Compliance Inspection Summary Report and 2010 Pretreatment Compliance Inspection Checklist mode of preparation.
2. Wesley Ganter (telephonic appearance as needed)
Director, PG Environmental, LLC
Testimony regarding 2014 Pretreatment Compliance Audit Final Summary Report, 2015 Pretreatment Compliance Inspection Checklist, and 2015 Pretreatment Compliance Inspection Summary Report mode of preparation.
3. Gerald Horner (as needed)
Research Program Specialist II (Economics)
Testimony regarding ability to pay and continue in business, and economic benefit of noncompliance.