| 1<br>2<br>3<br>4 | GLENN L. BLOCK (SB#208017)<br>CHRISTOPHER G. WASHINGTON (SB#307<br>CALIFORNIA EMINENT DOMAIN LAW<br>3429 Ocean View Blvd., Suite L<br>Glendale, CA 91208<br>Telephone: (818) 957-0477<br>Facsimile: (818) 957-3477 | 7804)<br>GROUP, APC                                 |
|------------------|--|---|
| 5 6              | Attorneys for Plaintiff MENDOCINO RAILWA   | Y   |
| 7                | SUPERIOR COURT OF TH   | E STATE OF CALIFORNIA                               |
| 8                | FOR THE COUNTY OF MENDOCINO  |   |
| 9                |  |   |
| 10               | MENDOCINO RAILWAY,   | Case No. SCUK-CVED-2020-74939                       |
| 11               | Plaintiff,   | [APN 038-180-53]                                    |
| 12               | v. )   |   |
| 13               | JOHN MEYER; REDWOOD EMPIRE TITLE   | PLAINTIFF MENDOCINO RAILWAY'S DESIGNATION OF EXPERT |
| 14               | COMPANY OF MENDOCINO COUNTY; )<br>SHEPPARD INVESTMENTS; MARYELLEN)   | WITNESSES   |
| 15<br>16         | SHEPPARD; MENDOCINO COUNTY (TREASURER-TAX COLLECTOR; All other persons unknown claiming an interest in the property; and DOES 1 through 100, inclusive,  |   |
| 17<br>18         | Defendants.  | Trial Date: July 11, 2022 Time: 9:00 a.m. Dept.: E  |
| 19               |  | •   |
| 20               | TO THE COURT, PARTIES AND TH   | EIR COUNSEL OF RECORD:                              |
| 21               | PLEASE TAKE NOTICE THAT: this 1  | Designation of Expert Witnesses is exchanged by     |
| 22               | Mendocino Railway ("Plaintiff") herein at this tin   | me in accordance with the statutory requirements    |
| 23               | and the parties' agreement. However, Plaintiff reserves the right to amend, revise and supplement  |   |
| 24               | this Designation of Expert Witnesses.  |   |
| 25               |  |   |
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| 28               |  |   |
|                  |  |   |

| 1  | Plaintiff hereby designates the following experts to testify at the time of trial in this matte     |  |
|----|---|--|
| 2  | 1. Howard Levy, MAI, AI-GRS   |  |
| 3  | Ward Levy Appraisal Group, Inc. 3510 Unocal Place, Suite 209 Santa Page CA 05403                    |  |
| 4  | Santa Rosa, CA 95403<br>707-575-7778  |  |
| 5  | Mr. Levy is an expert real estate appraiser. He is expected to testify as to the matters            |  |
| 6  | contained in his statement of valuation data/appraisal report including, without limitation, his    |  |
| 7  | valuation opinions including fair market value, as well opinions related to larger parcel/injury to |  |
| 8  | the remainder issues, just compensation and all matters related thereto. Mr. Levy's statement of    |  |
| 9  | valuation data/appraisal is exchanged concurrently herewith.  |  |
| 10 | 2. Joshua Kilgore, CEG  |  |
| 11 | Senior Engineering Geologist<br>LACO Associates   |  |
| 12 | 1072 N. State Street<br>Ukiah, CA 95482   |  |
| 13 | 707-443-5054  |  |
| 14 | Mr. Kilgore is a Certified Engineering Geologist. He is expected to testify as to the               |  |
| 15 | matters contained in his reports, his observation, investigation, evaluation and analysis of the    |  |
| 16 | Subject Property and all matters related thereto. Mr. Kilgore's report is exchanged concurrently    |  |
| 17 | herewith.   |  |
| 18 | Plaintiff reserves the right to call experts designated by Defendant and to amend, revise,          |  |
| 19 | supplement and modify this Designation.   |  |
| 20 |   |  |
| 21 | Dated: April 12, 2022 CALIFORNIA EMINENT DOMAIN LAW GROUP, a Professional Corporation               |  |
| 22 |   |  |
| 23 | 11 X  |  |
| 24 | By Glenn L. Block   |  |
| 25 | Attorneys for Plaintiff MENDOCINO RAILWAY   |  |
| 26 |   |  |
| 27 |   |  |
| 28 |   |  |

## **PROOF OF SERVICE**

Mendocino Railway v. John Meyer, et al. Mendocino Superior Court Case No.: SCUK-CVED-20-74939

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is 3429 Ocean View Boulevard, Suite L, Glendale, CA 91208. On April 12, 2022, I served the within document(s):

| 4        | 2022, I served the within document(s):   |  |
|----------|--|--|
| 5        | PLAINTIFF MENDOCINO RAILWAY'S DESIGNATION OF EXPERT WITNESSES  |  |
| 6<br>7   | ELECTRONIC MAIL: By transmitting via e-mail the document listed above to the e-mail address set forth below.   |  |
| 8        | BY MAIL: By placing a true copy of the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Glendale, California addressed as set forth in the attached service list   |  |
| 9        | OVERNIGHT DELIVERY: By overnight delivery, I placed such document(s) listed above in a sealed envelope, for deposit in the designated box or other facility regularly maintained by United Parcel Service for overnight delivery and caused such   |  |
| 11       | envelope to be delivered to the office of the addressee via overnight delivery pursuant to C.C.P. §1013(c), with delivery fees fully prepaid or provided for.  |  |
| 13       | PERSONAL SERVICE: By personally delivering the document(s) listed above to the person(s) listed below at the address indicated.  |  |
| 14       |  |  |
| 15<br>16 | 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 mailing in affidavit. |  |
| 17       |  |  |
| 18       |  |  |
| 19       | I declare under penalty of perjury under the laws of the State of California that the above is true and correct.   |  |
| 20       | Executed on April 12, 2022, in Glendale, California.   |  |
| 21       | Dua Carb   |  |
| 22       | Debi Carbon  |  |
| 23       |  |  |
| 24       |  |  |

CALIFORNIA EMINENT DOMAIN LAW GROUP, APC

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1 **SERVICE LIST** Mendocino Railway v. John Meyer, et al. 2 Mendocino Superior Court Case No.: SCUK-CVED-20-74939 3 Stephen F. Johnson Mannon, King, Johnson & Wipf, LLP 4 Attorneys for Defendant John Meyer 200 North School Street, Suite 304 5 Post Office Box 419 Ukiah, California 95482 6 steve@mkjlex.com 7 8 **Christian Curtis** Attorneys for Defendant Mendocino Brina Blanton County Treasurer-Tax Collector Office of the County Counsel 9 County of Mendocino-Administration Center 501 Low Gap road, Room 1030 Ukiah, California 95482 10 11 curtisc@mendocinocounty.org blantonb@mendocinocounty.org cocosupport@mendocinocounty.org 12 13 In Pro Per Maryellen Sheppard 27200 North Highway 1 14 Fort Bragg, CA 95437 sheppard@mcn.org 15 16 17 18 19 20 21 22 23 24 25 26 27 28