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20
21 Attorneys for Parties CITY OF RIALTO
and RIALTO UTILITY AUTHORITY
22

23 **IN THE MATTER OF**
24 **PERCHLORATE CONTAMINATION AT 160-ACRE SITE**
25 **IN THE RIALTO AREA**
26 **(SWRCB/OCC FILE A-1824)**

27 **CITY OF RIALTO'S AND RIALTO UTILITY AUTHORITY'S WITNESS LIST**
28

	DEPONENT	DEPOSITION DATE	DEPOSITION VOLUME NUMBER
1			
2			
3			
4	Allegranza, John	7/13/2005	I
5	Allegranza, John	8/15/2005	II
6	Apel, Ralph	8/29/2005	I
7	Apel, Ralph	8/30/2005	II
8	Ashurst, William	11/28/2005	I
9	Autote, Jr., Leonel	1/16/2007	I
10	William		
11	Autote, Jr., Leonel	1/17/2007	II
12	William		
13	Autote, Jr., Leonel	1/18/2007	III
14	William		
15	Biagioni, Linda	7/27/2005	I
16	Biagioni, Linda	7/28/2006	II
17	Biagioni, Linda	3/1/2006	III
18	Biagioni, Linda	9/26/2006	IV
19	Bland, Gerald	5/4/2005	I
20	Bland, Gerald	5/27/2005	II
21	Bland, Gerald	6/13/2005	III
22	Bland, Gerald	6/28/2005	IV
23	Bruner III, William	2/28/2006	I
24	Cardin, Harold	4/19/2005	I
25	Cardin, Harold	4/20/2005	II
26	Cardin, Harold	5/26/2005	III
27	Cardin, Harold	6/27/2005	IV
28	Cardin, Harold	2/6/2007	V

	DEPONENT	DEPOSITION DATE	DEPOSITION VOLUME NUMBER
1			
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3			
4	Carlton, Stuart	12/12/2005	I
5	Carlton, Stuart	12/13/2005	II
6	Carlton, Stuart	5/24/2006	III
7	Cartagena, Margot	9/20/2005	I
8	Cartagena, Margot	9/21/2005	II
9	Cartagena, Margot	11/30/2005	III
10	Cattaneo, Robert	4/7/2006	I
11	Clayton, Arnold	11/18/2004	I
12	Clayton, Arnold	11/19/2004	II
13	Cordiano, Dean	8/31/2006	I
14	Davis, Raymond	11/29/2004	I
15	Davis, Raymond	12/1/2004	II
16	Davis, Raymond	12/14/2004	III
17	Davis, Raymond	12/15/2004	IV
18	Davis, Raymond	1/25/2005	V
19	Davis, Raymond	1/26/2005	VI
20	Davis, Raymond	1/27/2005	VII
21	Davis, Raymond	3/24/2005	VIII
22	Davis, Raymond	3/25/2005	IX
23	Davis, Raymond	6/20/2005	X
24	Davis, Raymond	6/29/2005	XI
25	Davis, Raymond	9/22/2005	XII
26	Duvall, Gary	4/6/2006	I
27	Fenton, Charles	3/2/2006	I
28	Gardner, Frank	4/21/2005	I

	DEPONENT	DEPOSITION DATE	DEPOSITION VOLUME NUMBER
1			
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4	Gardner, Frank	4/22/2005	II
5	Gardner, Frank	7/6/2005	III
6	Gardner, Frank	7/7/2005	IV
7	Graham, John	1/18/2005	I
8	Graham, John	1/19/2005	II
9	Haggard, Jimmie	12/9/2004	I
10	Haggard, Jimmie	12/10/2004	II
11	Hatch, Harry	12/2/2005	I
12	Hatch, Harry	1/27/2006	II
13	Hescox, Harry	2/14/2005	I
14	Hescox, Harry	2/15/2005	II
15	Hescox, Harry	4/18/2005	III
16	Hutchison, Robert	3/21/2006	I
17	Hutchison, Robert	3/22/2006	II
18	Hutchison, Robert	3/27/2006	III
19	Hutchison, Robert	3/28/2006	IV
20	Hutchison, Robert	11/16/2006	V
21	Hutchison, Robert	11/17/2006	VI
22	Hutchison, Robert	2/9/2007	VII
23	Lutkus, Theodore	1/18/2006	I
24	McGee, Barbara	4/5/2007	I
25	McLaughlin, William	12/1/2006	I
26	McLaughlin, William	2/22/2007	II
27	Melito, John	11/1/2004	I
28	Melito, John	11/3/2004	II

	DEPONENT	DEPOSITION DATE	DEPOSITION VOLUME NUMBER
1			
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4	Melito, John	1/6/2005	III
5	Moriarty, Patrick	7/18/2005	I
6	Moriarty, Patrick	7/19/2005	II
7	Nelson, Cleland	6/15/2006	I
8	Nelson, Cleland	6/16/2006	II
9	Nelson, Cleland	7/27/2006	III
10	Nelson, Cleland	7/28/2006	IV
11	Nelson, Cleland	9/7/2006	V
12	Nelson, Cleland	9/8/2006	VI
13	Parrett, Robert	4/17/2006	I
14	Parrett, Robert	4/19/2006	II
15	Pfarr, JoAnne	6/22/2006	I
16	Pfarr, JoAnne	6/23/2006	II
17	Polzien, Ronald	4/5/2005	I
18	Polzien, Ronald	4/6/2005	II
19	Polzien, Ronald	4/7/2005	III
20	Polzien, Ronald	4/8/2005	IV
21	Polzien, Ronald	5/12/2005	V
22	Polzien, Ronald	5/13/2005	VI
23	Ransom, Donald	9/19/2006	I
24	Ransom, Donald	9/20/2006	II
25	Robinson, Earl	3/21/2006	I
26	Robinson, Earl	3/22/2006	II
27	Roop, Jr., Marshall	1/16/2006	I
28	Roop, Jr., Marshall	1/17/2006	II

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DEPONENT	DEPOSITION DATE	DEPOSITION VOLUME NUMBER
Sachara, Eugene	8/11/2005	I
Sachara, Eugene	8/12/2005	II
Sachara, Eugene	8/25/2005	III
Sachara, Eugene	8/26/2005	IV
Skaggs, Charles	6/30/2005	I
Skovgard, Fred	4/26/2005	I
Skovgard, Fred	4/27/2005	II
Skovgard, Fred	4/28/2005	III
Skovgard, Fred	5/23/2005	IV
Skovgard, Fred	5/24/2005	V
Souza, James	12/5/2006	I
Souza, James	12/6/2006	II
Steinmeyer, Edgar	3/7/2006	I
Steinmeyer, Edgar	3/8/2006	II
Veline, Robert	5/23/2006	I
Veline, Robert	9/21/2006	II
Waters, Viola	7/29/2005	I
Wever, Dwight	11/9/2004	I
Wever, Dwight	12/7/2004	II
Wilkins, Mildred	9/8/2005	I

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Attorneys for Plaintiffs CITY OF RIALTO and
RIALTO UTILITY AUTHORITY

IN THE MATTER OF
PERCHLORATE CONTAMINATION AT 160-ACRE SITE
IN THE RIALTO AREA
(SWRCB/OCC FILE A-1824)

WITNESSES TESTIMONY SUMMARIES FOR CITY OF RIALTO'S AND RIALTO
UTILITY AUTHORITY

1 Pursuant to the REVISED NOTICE OF HEARING issued March 8, 2007 by
2 Executive Officer, Board Chair for the State Water Resources Control Board, the City of
3 Rialto and Rialto Utility Authority ("Rialto") respectfully submits the following testimony
4 summaries for the witness testimony and/or deposition testimony Rialto intends to offer
5 at the May 2007 Public Hearing. Rialto reserves the right to supplement this list or the
6 deposition citations notes for any reason, including for foundation or authentication
7 purposes or order of the Hearing Officer.

8
9 1. John Allegranza

10 Mr. Allegranza is a former materials handler for WCLC and worked at WCLC's
11 Rialto facility. Mr. Allegranza will testify regarding the manufacturing of various WCLC
12 products and use of TCE, and discharge of TCE into environment at WCLC's Rialto
13 facility. The specific questions and answers Rialto intends to ask and elicit from Mr.
14 Allegranza can be located at the following page numbers of Mr. Allegranza's deposition:
15 (vol.1) 21, 26:5-26:11, 27:23-28:21, 35:15-35:19, 39:12-39:21, 40:2-40:16, 41:7-41:7-
16 22, 42:14-42:23, 102:7-104:11, 129:17-130:19, (vol.2) 8:7-9:13, 46:9-48:2, 54:14-54:23,
17 63:13-67:7, 71:11-71:25, 72:12-73:5. The subject areas covered in the deposition are
18 incorporated by reference. We reserve the right to supplement this based on the case
19 submission of Emhart Industries, Inc., Kwikset Locks, Inc., Kwikset Corporation, Black &
20 Decker Inc., Pyro Spectaculars and Goodrich Corporation to be received on April 17,
21 2007 and further reserve the right to offer any portion of this deponent's transcript for
22 impeachment and rebuttal purposes.

23
24 2. Ralph Apel

25 Mr. Apel was the facilities manager for Pyrotronics. Mr. Apel will testify about
26 what he observed about PSI's operations and PSI's disposal of aerial shells in the
27 McLaughlin Pit. The testimony Rialto intends to elicit from Mr. Apel can be located at
28

1 the following page and line numbers of Mr. Apel's deposition: 24, 137:12-137:18,
2 149:13-150:17, 150:25-151:4, 152:15-154:1, 157:6-158:23, 159:24-161:14, 164:7-165:5,
3 198:4-200:5, 295:11-296:23, 320:8-321:1, 1984. The subject areas covered in the
4 deposition are incorporated by reference. We reserve the right to supplement this
5 based on the case submission of Emhart Industries, Inc., Kwikset Locks, Inc., Kwikset
6 Corporation, Black & Decker Inc., Pyro Spectaculars and Goodrich Corporation to be
7 received on April 17, 2007 and further reserve the right to offer any portion of this
8 deponent's transcript for impeachment and rebuttal purposes.

9
10 3. William Ashurst

11 Mr. Ashurst is a former machine operator and materials handler from WCLC. He
12 will testify regarding general operating procedures at the Rialto plant as well as his
13 knowledge of perchlorate disposal practices during his tenure. The testimony Rialto
14 intends to elicit from Mr. Ashurst can be located at the following page numbers of Mr.
15 Ashurst's deposition: 54, 58:4-59:12; 77:24-78:11; 89:24-90:13. The subject areas
16 covered in the deposition are incorporated by reference. We reserve the right to
17 supplement this based on the case submission of Emhart Industries, Inc., Kwikset
18 Locks, Inc., Kwikset Corporation, Black & Decker Inc., Pyro Spectaculars and Goodrich
19 Corporation to be received on April 17, 2007 and further reserve the right to offer any
20 portion of this deponent's transcript for impeachment and rebuttal purposes.

21
22 4. Leo Autote

23 Mr. Autote was PSI's plant manager for the Astro division. Mr. Autote worked for
24 Trojan fireworks and Trojan's "Astro" division. Mr. Autote continued to work for Astro at
25 2298 Stonehurst after it was purchased by PSI. Mr. Autote will testify regarding Astro's
26 operations while a division of PSI. The testimony Rialto intends to elicit from Mr. Autote
27 can be located at the following page and line numbers of Mr. Autote's deposition: 145:9-

1 11, 278:5-298:8, 534:17-535:16. The subject areas covered in the deposition are
2 incorporated by reference. We reserve the right to supplement this based on the case
3 submission of Emhart Industries, Inc., Kwikset Locks, Inc., Kwikset Corporation, Black &
4 Decker Inc., Pyro Spectaculars and Goodrich Corporation to be received on April 17,
5 2007 and further reserve the right to offer any portion of this deponent's transcript for
6 impeachment and rebuttal purposes.

7
8 5. Gerald Bland

9 Gerald Bland is a former employee of both Goodrich Corporation and WCLC.
10 Mr. Bland was worked as an assembler and night watchman for WCLC. For Goodrich
11 Corp., Mr. Bland was part of a final assembly team for filling and finishing various rocket
12 motors. Mr. Bland will testify his handling and clean-up of potassium perchlorate at
13 WCLC. Mr. Bland will further testify about his personal experience loading and trimming
14 Goodrich rocket motors, and salvaging rocket motors, and the use of solvents at
15 Goodrich's Rialto facility. The testimony Rialto intends to elicit from Mr. Bland can be
16 located at the following page numbers of Mr. Bland's deposition: 19:4-16, 20:8-11,
17 26:6-20, 27, 28:18-29:21, 34:14-20, 37:6-40:20, 51:2-52:5, 83:8-84:15, 93-94, 116:17-
18 19, 173:8-176:7, 182:11-184:1, 188:15-189:9, 229:18-237:17. The subject areas
19 covered in the deposition are incorporated by reference. We reserve the right to
20 supplement this based on the case submission of Emhart Industries, Inc., Kwikset
21 Locks, Inc., Kwikset Corporation, Black & Decker Inc., Pyro Spectaculars and Goodrich
22 Corporation to be received on April 17, 2007 and further reserve the right to offer any
23 portion of this deponent's transcript for impeachment and rebuttal purposes.

24
25 6. Stuart Carlton

26 Mr. Carlton is a former Trojan and PSI employee. Carlton was the plant manager
27 for Trojan at 2298 Stonehurst, and worked for PSI for a short period after the Astro

1 division was sold to PSI. The testimony Rialto intends to elicit from Mr. Carlton can be
2 located at the following page and line numbers of Mr. Carlton's deposition: 37, 50,
3 301:25-302:13, 362:6-363:14, 399. The subject areas covered in the deposition are
4 incorporated by reference. We reserve the right to supplement this based on the case
5 submission of Emhart Industries, Inc., Kwikset Locks, Inc., Kwikset Corporation, Black &
6 Decker Inc., Pyro Spectaculars and Goodrich Corporation to be received on April 17,
7 2007 and further reserve the right to offer any portion of this deponent's transcript for
8 impeachment and rebuttal purposes.

9
10 7. Margot Cartagena

11 Ms. Cartagena is the former facilities manager for Pyrotronics and American
12 Promotional Events, Inc. Ms. Cartagena will testify about her observations of PSI
13 operations and testing of aerial shells. The testimony Rialto intends to elicit from Ms.
14 Cartagena can be located at the following page and line numbers of Ms. Cartagena's
15 deposition: 70:1-25, 74:1-18. The subject areas covered in the deposition are
16 incorporated by reference. We reserve the right to supplement this based on the case
17 submission of Emhart Industries, Inc., Kwikset Locks, Inc., Kwikset Corporation, Black &
18 Decker Inc., Pyro Spectaculars and Goodrich Corporation to be received on April 17,
19 2007 and further reserve the right to offer any portion of this deponent's transcript for
20 impeachment and rebuttal purposes.

21
22 8. Arnold Clayton

23 Mr. Clayton is a former product assembler for WCLC and worked at WCLC's
24 Rialto facility. Mr. Clayton will testify about his personal handling and clean-up of
25 potassium perchlorate and flashpowder, and use of TCE at WCLC's Rialto facility. The
26 testimony Rialto intends to elicit from Mr. Clayton can be located at the following page
27 numbers of Mr. Clayton's deposition: 22:10-23:22, 24:9-25:14, 26:18-27:8, 28:15-30:1,
28

1 30:5-30:11, 30:17-31:12, 30:25-31:8, 31:13-32:2, 32:3-33:8, 32:23-33:8, 57:11-58:6,
2 57:16-59:18, 58:7-60:3, 63:8-64:25, 68:4-68:15, 79:14-80:4, 80:10-80:20, 81:8-81:16,
3 81:17-81:20, 82:14-83:13, 82:22-83:13, 83:14-85:7, 85:13-86:5, 100:13-100:21, 101:22-
4 102:3, 102:4-102:19, 103:16-104:4, 107:15-107:23, 228:20-228:25, 240:23-241:17;
5 246:14-247:6, 260:18-260:23, 261:16-264:1, 283:14-284:102, 285:8-285:24, 289:1-
6 289:4, 291:25-292:7. The subject areas covered in the deposition are incorporated by
7 reference. We reserve the right to supplement this based on the case submission of
8 Emhart Industries, Inc., Kwikset Locks, Inc., Kwikset Corporation, Black & Decker Inc.,
9 Pyro Spectaculars and Goodrich Corporation to be received on April 17, 2007 and
10 further reserve the right to offer any portion of this deponent's transcript for
11 impeachment and rebuttal purposes.

12
13 9. Raymond Davis

14 Raymond Davis is a former night foreman, foreman and superintendent of
15 assembly for photoflash cartridges for West Coast Loading Corporation ("WCLC"). Mr.
16 Davis will testify about the use and disposal of potassium perchlorate in the
17 manufacturing and testing of photo flash cartridges and other WCLC products. Mr.
18 Davis will further testify about the clean-up and disposal practices for potassium
19 perchlorate that was attendant to WCLC manufacturing process. The testimony Rialto
20 intends to elicit from Mr. Davis can be located at the following page numbers of Mr.
21 Davis' deposition: 25:14-25:24, 33:1-33:4, 33:23-34:13, 35:11-36:7, 39:1-40:25, 53:12-
22 54:20, 61:4-61:8, 62:8-65:17, 67:5-67:22, 67:24-69:4, 82:23-86:9, 88:7-89:7, 90:24-
23 91:10, 92:14-94:1, 94:2-95:6, 102:8-102:12, 105:1-105:25, 106:1-106:25, 107:1-107:25,
24 107:19-108:1, 109:11-110:9, 110:1-112:25, 111:4-112:16, 114:1-114:25, 114:3-115:17,
25 116:21-118:6, 117:1-117:25, 119:9-120:16, 119:1-121:25, 119:11-129:9, 122:8-124:16,
26 122:16-124:16, 123:1-124:25, 128:14-130:20, 132:6-133:1, 142:11-144:7, 146:25-
27 147:24, 149:25-153:6, 151:1-152:25, 153:1-153:25, 155:1-155:25, 158:1-159:25, 161:1-

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1 165:25, 163:1-165:9, 184:7-185:2, 185:1-185:25, 206:1-206:10, 207:3-207:14, 207:9-
2 208:9, 208:11-209:22, 211:19 -213:22, 218:1-219:25, 220:1-220:25, 222:7-222:24,
3 262:9 -265:11, 265:15-267:15, 269:19-270:24, 272:1-272:11, 324:4-326:2, 341:1-345:5,
4 344:2-345:1, 344:2-346:6, 347:22-352:7, 350:1-350:25, 354:18-355:21, 366:4-367:20,
5 369:3-369:20, 369:1-369:25, 372:23-373:5, 373:20-373:23, 373:1-373:25, 375:2-376:4,
6 441:24 -442:18, 450:12-452:21, 484:8-489:9, 493:19-494:12, 495:3-495:17, 496:19-
7 498:21, 500:7-503:8, 504:1-508:10, 544:8-546:19, 793:21-794:21, 799:8-799:15, 803:6-
8 803:17, 803:23-804:2, 806:25-807:11, 827:20-828:22, 973:16-974:19, 978:9-978:17,
9 977:3-977:6, 1012:5-1012:10, 1014:3-1014:14, 1060:2 -1060:24, 1090:8-1090:15,
10 1091:4-1091:17, 1091:19-1091:24, 1098:1-1098:17, 1143:11-1144:3, 1178:9-1179:14.
11 The subject areas covered in the deposition are incorporated by reference. We reserve
12 the right to supplement this based on the case submission of Emhart Industries, Inc.,
13 Kwikset Locks, Inc., Kwikset Corporation, Black & Decker Inc., Pyro Spectaculars and
14 Goodrich Corporation to be received on April 17, 2007 and further reserve the right to
15 offer any portion of this deponent's transcript for impeachment and rebuttal purposes.

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10. Frank Gardner

Frank Gardner was a former process chemist for WCLC. In addition to his job duties as chemist, Mr. Gardner was responsible for enforcing safety procedures and standard operating procedures at WCLC in Rialto. Mr. Gardner will testify regarding the use of potassium perchlorate at WCLC, and WCLC standard operating procedures with respect to the manufacturing and clean-up process for photoflash powder and potassium perchlorate. The testimony Rialto intends to elicit from Mr. Gardner can be located at the following page numbers of Mr. Gardner's deposition: 36:11-36:17, 45:4-45:8, 54:4-54:7, 59:6-59:13, 62:7-62:15, 88:13-88:16, 90:1-90:4, 92:1-92:13, 98:8-98:13, 113:1-113:10, 121:7-121:16, 126:19-126:22, 127:2-127:10, 144:1-145:25, 175:14-175:16, 176:8-176:11, 183:7-183:16, 185:24-186:2, 187:9-188:4, 188:14-188:16,

1 195:21-195:24, 211:1-211:17, 215:7-215:15, 230:6-230:24, 243:13-243:22, 389:1-
2 389:23, 506:9-506:18, 519:14-519:19, 527:7-527:18, 529:1-529:18, 535:7-535:16. The
3 subject areas covered in the deposition are incorporated by reference. We reserve the
4 right to supplement this based on the case submission of Emhart Industries, Inc.,
5 Kwikset Locks, Inc., Kwikset Corporation, Black & Decker Inc., Pyro Spectaculars and
6 Goodrich Corporation to be received on April 17, 2007 and further reserve the right to
7 offer any portion of this deponent's transcript for impeachment and rebuttal purposes.

8
9 11. John Graham

10 John Graham is a former research and development engineer for Goodrich
11 Corporation. Mr. Graham will testify about his personal experience working on research
12 and development and testing of rocket motors and rocket propellant for Goodrich Corp.
13 in Rialto. The testimony Rialto intends to elicit from Mr. Graham can be located at the
14 following page numbers of Mr. Graham's deposition: 96:11-16 132:20-133:7. The
15 subject areas covered in the deposition are incorporated by reference. We reserve the
16 right to supplement this based on the case submission of Emhart Industries, Inc.,
17 Kwikset Locks, Inc., Kwikset Corporation, Black & Decker Inc., Pyro Spectaculars and
18 Goodrich Corporation to be received on April 17, 2007 and further reserve the right to
19 offer any portion of this deponent's transcript for impeachment and rebuttal purposes.

20
21 12. Jimmie Haggard

22 Jimmie Haggard is a former production employee for Goodrich Corporation. Mr.
23 Haggard will testify about his personal experience loading rocket motors at Goodrich's
24 facility in Rialto. Mr. Haggard will further testify regarding the grinding of ammonium
25 perchlorate, the mixing of perchlorate-based propellant, the trimming of solid rocket
26 propellant from finished motors, and the clean-up process for all of the foregoing. The
27 testimony Rialto intends to elicit from Mr. Haggard can be located at the following page

28

1 numbers of Mr. Haggard's deposition: 17:19-18:5, 18:20-20:11, 28:1-28:22, 40:18-
2 42:16, 49:18-50:17, 51:23-53:22, 53:23-55:13, 59:16-60:3, 62:22-63:10, 66:21-67:7,
3 68:10-68:22, 69:21-71:24, 71:25-74:8, 74:24-77:22, 78:16-79:21, 81:2-83:8, 89:4-92:17,
4 93:22-94:24, 99:22-100:18, 101:18-104:22, 248:22-250:17. The subject areas covered
5 in the deposition are incorporated by reference. We reserve the right to supplement this
6 based on the case submission of Emhart Industries, Inc., Kwikset Locks, Inc., Kwikset
7 Corporation, Black & Decker Inc., Pyro Spectaculars and Goodrich Corporation to be
8 received on April 17, 2007 and further reserve the right to offer any portion of this
9 deponent's transcript for impeachment and rebuttal purposes.

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13. Harry Hatch

Harry Hatch is a detective for the San Bernardino County Sheriff's Department. Mr. Hatch will testify about his visits to PSI's Rialto facility over the years. The testimony Rialto intends to elicit from Mr. Hatch can be located at the following page and line numbers of Mr. Hatch's deposition: 89:10-92:8. The subject areas covered in the deposition are incorporated by reference. We reserve the right to supplement this based on the case submission of Emhart Industries, Inc., Kwikset Locks, Inc., Kwikset Corporation, Black & Decker Inc., Pyro Spectaculars and Goodrich Corporation to be received on April 17, 2007 and further reserve the right to offer any portion of this deponent's transcript for impeachment and rebuttal purposes.

14. Harry Hescox

Executive VP of Clipper Fireworks and President of Pyrotronics Corp until 1986. Mr. Hescox will testify generally about his experience with Pyro Spectaculars, Inc. ("PSI") before it was sold to Mr. Souza, and PSI's operation post sale including disposed of perchlorate containing aerial shells in the McLaughlin Pit. The testimony Rialto intends to elicit from Mr. Hescox can be located at the following page and line

1 numbers of Mr. Hescox's deposition: 37:3-37:9, 47:3-49:12, 79:4-81:1, 105:9-105:17,
2 197:22-200:25, 198:17-199:24, 200:20-200:23, 201:7-204:17, 219:1-231:25, 175:15-
3 176:9, 175:15-176:20, 199:19-200:9, 205:13-206:4, 206:13-207:5, 314:1-316:25, 360:4-
4 362:21. The subject areas covered in the deposition are incorporated by reference. We
5 reserve the right to supplement this based on the case submission of Emhart Industries,
6 Inc., Kwikset Locks, Inc., Kwikset Corporation, Black & Decker Inc., Pyro Spectaculars
7 and Goodrich Corporation to be received on April 17, 2007 and further reserve the right
8 to offer any portion of this deponent's transcript for impeachment and rebuttal purposes.
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10 15. William McLaughlin

11 Mr. McLaughlin is an environmental consultant who supervised the closure of the
12 McLaughlin Pit on behalf of Western Precast. Mr. McLaughlin will testify regarding the
13 process he undertook in gaining administrative approval to close the Pit, and the
14 physical steps taken to close the Pit. Mr. McLaughlin will further testify regarding his
15 assessment of the Pit, including whether it leaked at any time. The testimony Rialto
16 intends to elicit from Mr. McLaughlin can be located at the following page and line
17 numbers of Mr. McLaughlin's deposition: (vol.1) 51:1-51:24, 125:13-127:18, 133:17-
18 134:2, 170:7-171:3, 181:12-183:1, 191:18-194:8, (vol.2) 63:1-65:24, 189:5-191:3. The
19 subject areas covered in the deposition are incorporated by reference. We reserve the
20 right to supplement this based on the case submission of Emhart Industries, Inc.,
21 Kwikset Locks, Inc., Kwikset Corporation, Black & Decker Inc., Pyro Spectaculars and
22 Goodrich Corporation to be received on April 17, 2007 and further reserve the right to
23 offer any portion of this deponent's transcript for impeachment and rebuttal purposes.
24

25 16. John Melito

26 Mr. Melito is WCLC's former chief process inspector. Mr. Melito will testify
27 regarding WCLC manufacturing processes. The testimony Rialto intends to elicit from
28

1 Mr. Melito can be located at the following page and line numbers of Mr. Melito's
2 deposition: 402:1-403:25. The subject areas covered in the deposition are incorporated
3 by reference. We reserve the right to supplement this based on the case submission of
4 Emhart Industries, Inc., Kwikset Locks, Inc., Kwikset Corporation, Black & Decker Inc.,
5 Pyro Spectaculars and Goodrich Corporation to be received on April 17, 2007 and
6 further reserve the right to offer any portion of this deponent's transcript for
7 impeachment and rebuttal purposes.

8
9 17. Patrick Moriarty

10 Patrick Moriarty was the principal shareholder for Clipper Fireworks Co., Atlas
11 Fireworks Co. and Pyrotronics. Mr. Moriarty will testify regarding PSI's historical
12 operations as well as PSI's use, disposal and testing of aerial shells. The testimony
13 Rialto intends to elicit from Mr. Moriarty can be located at the following page and line
14 numbers of Mr. Moriarty's deposition: 35:17-5:25, 37:1-7:2, 36:1-25, 192:13-93:10,
15 194:20-95:7. The subject areas covered in the deposition are incorporated by
16 reference. We reserve the right to supplement this based on the case submission of
17 Emhart Industries, Inc., Kwikset Locks, Inc., Kwikset Corporation, Black & Decker Inc.,
18 Pyro Spectaculars and Goodrich Corporation to be received on April 17, 2007 and
19 further reserve the right to offer any portion of this deponent's transcript for
20 impeachment and rebuttal purposes.

21
22 18. Joane Pfarr

23 Ms. Pfarr is a former assembler from WCLC. She will testify about her
24 knowledge of perchlorate powder handling as well as general cleaning practices at the
25 Rialto plant. The testimony Rialto intends to elicit from Ms. Pfarr can be located at the
26 following page numbers of Ms. Pfarr's deposition: 28:20-29:24; 32:14-33:15; 40:7-
27 41:19, 53:15-54:19; 55:1-22; 60:16-62:10; 95:16-96:19; 112:14-113:21. The subject
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1 areas covered in the deposition are incorporated by reference. We reserve the right to
2 supplement this based on the case submission of Emhart Industries, Inc., Kwikset
3 Locks, Inc., Kwikset Corporation, Black & Decker Inc., Pyro Spectaculars and Goodrich
4 Corporation to be received on April 17, 2007 and further reserve the right to offer any
5 portion of this deponent's transcript for impeachment and rebuttal purposes.

6
7 19. Ronald Polzien

8 Ronald Polzien is a former Test Engineer for Goodrich Corporation in Rialto. Mr.
9 Polzien will testify about the use of ammonium perchlorate in Goodrich Corporation's
10 rocket motor manufacturing and testing at the 160 Acre Parcel. Mr. Polzien will also
11 testify regarding Goodrich Corporation's procedures for disposing of ammonium
12 perchlorate and trichloroethylene (TCE) in an earthen burn pit. The testimony Rialto
13 intends to ask and elicit from Mr. Polzien can be located at the following page and line
14 numbers of Mr. Polzien's deposition: 19:11-21:13, 22-23, 26-27, 30-31, 48:13-48:21,
15 49:24-51:20, 87:1-87:24, 89:13-91:10, 93, 103:18-106:4, 106:15-108:2, 109:22-110:8,
16 121:3-123:3, 123:5-123:19, 125:2-126:1, 126:12-127:3, 128:22-130:15, 131:10-132:4,
17 133:24-134:24, 136:18-137:7, 139:17-141:22, 146:25-147:23, 153:22-154:23, 199:6-
18 201:28, 203:19-204:1, 213:16-213:18, 215:20-215:22, 217:7-218:16, 220:21-221:4,
19 229:12-229:23, 232:19-233:1, 233:13-233:24, 234:8-234:11, 251:5--252:12, 253:11-
20 253:14, 262:24-263:2, 268:3-268:18, 272:4-272:22, 273:21-275:6, 275:19-276:4,
21 276:24-277:11, 339-340, 491:2-491:18, 493:24-494:16, 500:6-501:11, 557:5-557:8, 748,
22 779:20-780:1, 935, 975, 1049:-1049:22, 1163, 1203:25-1205:12, 1229:17-1230:11,
23 1230:22-1231:4, 1232:17-1233:24, 1295:11-1297:24. The subject areas covered in the
24 deposition are incorporated by reference. We reserve the right to supplement this
25 based on the case submission of Emhart Industries, Inc., Kwikset Locks, Inc., Kwikset
26 Corporation, Black & Decker Inc., Pyro Spectaculars and Goodrich Corporation to be
27 received on April 17, 2007 and further reserve the right to offer any portion of this

1 deponent's transcript for impeachment and rebuttal purposes.

2
3 20. Donald H. Ransom

4 Mr. Ransom is a former industrial engineer from KLI and also worked at the
5 WCLC facility in Rialto. He will testify about the initial construction of the Rialto plant
6 and about the manufacturing process at WCLC. He will also testify regarding his
7 knowledge of perchlorate disposal procedures. The testimony Rialto intends to elicit
8 from Mr. Ransom can be located at the following page numbers of Mr. Ransom's
9 deposition: 86-87, 91:7-92:18; 93:3-15; 106:14-109:4; 117:8-21; 118:12-120:3; 145:18-
10 146:15; 166:11-24; 172:22-173:10. The subject areas covered in the deposition are
11 incorporated by reference. We reserve the right to supplement this based on the case
12 submission of Emhart Industries, Inc., Kwikset Locks, Inc., Kwikset Corporation, Black &
13 Decker Inc., Pyro Spectaculars and Goodrich Corporation to be received on April 17,
14 2007 and further reserve the right to offer any portion of this deponent's transcript for
15 impeachment and rebuttal purposes.

16
17 21. Eugene Sachara

18 Mr. Sachara is a former employee of Goodrich Corporation. Mr. Sachara will
19 testify about manufacturing and testing process for various rocket motors at Goodrich's
20 Rialto facility. The testimony Rialto intends to elicit from Mr. Sachara can be located at
21 the following page and line numbers of Mr. Sachara's deposition: 53:10-54:4; 56:15-
22 57:10, 59:15-60:17, 126:10-128:16, 129:13-129:24, 198:15-21. The subject areas
23 covered in the deposition are incorporated by reference. We reserve the right to
24 supplement this based on the case submission of Emhart Industries, Inc., Kwikset
25 Locks, Inc., Kwikset Corporation, Black & Decker Inc., Pyro Spectaculars and Goodrich
26 Corporation to be received on April 17, 2007 and further reserve the right to offer any
27 portion of this deponent's transcript for impeachment and rebuttal purposes.

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22. Charles Skaggs

Mr. Skaggs is a former fire chief for the City of Rialto. Mr. Skaggs will testify about his investigation of explosive incidents at PSI's facility in Rialto. The specific testimony Rialto intends to elicit from Mr. Skaggs can be located at the following page and line numbers of Mr. Skaggs' deposition: 18-19, 84:17-86:23. The subject areas covered in the deposition are incorporated by reference. We reserve the right to supplement this based on the case submission of Emhart Industries, Inc., Kwikset Locks, Inc., Kwikset Corporation, Black & Decker Inc., Pyro Spectaculars and Goodrich Corporation to be received on April 17, 2007 and further reserve the right to offer any portion of this deponent's transcript for impeachment and rebuttal purposes.

23. Fred Skovgard

Mr. Skovgard is a former chemist for WCLC and worked at WCLC's Rialto facility. Mr. Skovgard will testify regarding the use and "scrap allowance" for potassium perchlorate at WCLC's facility in Rialto. Mr. Skovgard will further testify regarding amounts of potassium perchlorate use in various WCLC products and the standard operating procedures for WCLC in Rialto. The testimony Rialto intends to elicit from Mr. Skovgard can be located at the following page numbers of Mr. Skovgard's deposition: 15-17, 43:7-45:7, 109:15-110:18, 118:17-120:12, 141:11-144:14; 160:15-162:12; 253:17-254:6; 257:18-259:10; 276:25-278:11; 317:23-319:4; 347:3-350:11; 353:10-356:20; 383:24-384:2; 414:11-25; 768:16-19. The subject areas covered in the deposition are incorporated by reference. We reserve the right to supplement this based on the case submission of Emhart Industries, Inc., Kwikset Locks, Inc., Kwikset Corporation, Black & Decker Inc., Pyro Spectaculars and Goodrich Corporation to be received on April 17, 2007 and further reserve the right to offer any portion of this

1 deponent's transcript for impeachment and rebuttal purposes.

2
3 24. James Souza

4 James Souza is the president of PSI. Mr. Souza will be questioned regarding
5 PSI operations at its Rialto facility including the testing and disposal of fireworks. The
6 testimony Rialto intends to elicit from Mr. Souza can be located at the following page
7 and line numbers of Mr. Souza's deposition: 38:6-38:12, 39:9-39:17, 39:22-39:24, 41:9-
8 41:12, 45:4-45:18, 53:18-56:16, 99:18-100:9, 103:7-104:17, 105:11-105:19, 122:8-
9 122:19, 141:10-141:13, 143:16-146:12, 163:18-200:10, 176:11-177:19, 184:16-185:15,
10 194:21-195:20, 197:13-198:25, 200:14-204:15, 267:1-267:10, 279:6-279:15, 387:13-
11 409:7, 420:24-421:16, 450:7-450:11, 469:4-469:17. The subject areas covered in the
12 deposition are incorporated by reference. We reserve the right to supplement this
13 based on the case submission of Emhart Industries, Inc., Kwikset Locks, Inc., Kwikset
14 Corporation, Black & Decker Inc., Pyro Spectaculars and Goodrich Corporation to be
15 received on April 17, 2007 and further reserve the right to offer any portion of this
16 deponent's transcript for impeachment and rebuttal purposes.

17
18 25. Robert Veline

19 Mr. Veline was a former Trojan and PSI employee. Mr. Veline was a self taught
20 chemist who learned about fireworks manufacturing under Stuart Carlton. Mr. Veline
21 will testify about PSI's manufacturing and testing of pyrotechnic devises. The testimony
22 Rialto intends to elicit from Mr. Veline can be located at the following page and line
23 numbers of Mr. Veline's deposition: 57:10-60:12; 86:8-87:21; 240:13-241:1, 300:23-
24 302:2, 332:22-333:20. The subject areas covered in the deposition are incorporated by
25 reference. We reserve the right to supplement this based on the case submission of
26 Emhart Industries, Inc., Kwikset Locks, Inc., Kwikset Corporation, Black & Decker Inc.,
27 Pyro Spectaculars and Goodrich Corporation to be received on April 17, 2007 and

1 further reserve the right to offer any portion of this deponent's transcript for
2 impeachment and rebuttal purposes.

3
4 26. Viola Waters

5 Ms. Waters was a Cardex clerk tracking inventory at WCLC, and later a
6 purchasing agent. The testimony Rialto intends to elicit from Ms. Waters can be located
7 at the following page and line numbers of Ms. Waters' deposition: 13-15, 20:12-20:22.
8 The subject areas covered in the deposition are incorporated by reference. We reserve
9 the right to supplement this based on the case submission of Emhart Industries, Inc.,
10 Kwikset Locks, Inc., Kwikset Corporation, Black & Decker Inc., Pyro Spectaculars and
11 Goodrich Corporation to be received on April 17, 2007 and further reserve the right to
12 offer any portion of this deponent's transcript for impeachment and rebuttal purposes.

13
14 27. Dwight Wever

15 Dwight Wever is a former Production Manager for Goodrich Corporation in Rialto.
16 Mr. Wever assisted in opening Goodrich's Rialto plant and stayed through its closure.
17 Mr. Wever will testify about the use of ammonium perchlorate and TCE at Goodrich's
18 Rialto facility. Mr. Wever will further testify regarding the production process for LOKI
19 and Sidewinder rocket motors, and the clean-up and disposal of ammonium perchlorate
20 associated with the production process. The testimony Rialto intends to elicit from Mr.
21 Wever can be located at the following page and line numbers of Mr. Wever's deposition:
22 11-17, 19:22-22:12, 25:5-25:10, 26:10-27:17, 27:21-29:7, 29:13-30:2, 33:11-33:17,
23 35:13-36:8, 36:25-37:11, 38:19-38:25, 40:14-42:23, 44:23-45:11, 45:12-45:25, 49:6-
24 49:20, 51:18-51:24, 52:11-52:19, 57:22-58:15, 58:6-59:21, 60:14-60:17, 61:23-62:20,
25 66:16-67:14, 68:7-69:12, 95:2-95:16, 116:17-116:19, 117:8 -118:4, 159:2-159:15,
26 164:5-164:20, 230:24-231:11, 246:15-246:19, 254:5-255:8, 269:11-271:23, 280:2-
27 281:12, 321:9-321:23, 331:17-332:7, 345:7-345:12, 347:7-347:24, 353:5-356:15. The

1 subject areas covered in the deposition are incorporated by reference. We reserve the
2 right to supplement this based on the case submission of Emhart Industries, Inc.,
3 Kwikset Locks, Inc., Kwikset Corporation, Black & Decker Inc., Pyro Spectaculars and
4 Goodrich Corporation to be received on April 17, 2007 and further reserve the right to
5 offer any portion of this deponent's transcript for impeachment and rebuttal purposes.

6
7 28. Cleland Nelson

8 Mr. Nelson is a former accounting manager for Kwikset Locks, Inc ("KLI"). He
9 will testify about KLI's general accounting procedures and the relationship between KLI
10 and American Hardware Corporation ("AHC"). The testimony Rialto intends to elicit
11 from Mr. Nelson can be located at the following page numbers of Mr. Nelson's
12 deposition: 44:4-44:6, 183:18-189:19; 225:10-226:9; 232:6-233:16; 270:8-272:12;
13 293:24-303:11; 323:14-335:3; 333:3-335:2, 337:16-338:3, 358:21-364:5, 389:6-392:2;
14 725:9-727:17; 744:11-745:20; 748:16-751:1, 859:3-24; 861:1-861:6, 869:7-869:18,
15 869:25-872:1, 872:10-872:22, 873:5-873:19, 891:15-895:21, 896:18-897:20, 900:7-
16 903:2; 915:6-24; 917:19-919:9, 925:3-927:14; 1120:6-1121:2, 1170:5-1173:13. The
17 subject areas covered in the deposition are incorporated by reference. We reserve the
18 right to supplement this based on the case submission of Emhart Industries, Inc.,
19 Kwikset Corporation, Kwikset Locks, Inc., Black & Decker Inc., Pyro Spectaculars and
20 Goodrich Corporation to be received on April 17, 2007 and further reserve the right to
21 offer any portion of this deponent's transcript for impeachment and rebuttal purposes.

22
23 29. Harold Cardin

24 Mr. Cardin is the former chief accountant at West Coast Loading Company
25 ("WCLC") in charge of payroll. He will testify about WCLC's general accounting
26 protocols as dictated by KLI as well as operations at AHC. The testimony Rialto intends
27 to elicit from Mr. Cardin can be located at the following page numbers of Mr. Cardin's

1 deposition: 24:11-25:22; 157:16-158:11; 161:24-163:4; 164:4-25. The subject areas
2 covered in the deposition are incorporated by reference. We reserve the right to
3 supplement this based on the case submission of Emhart Industries, Inc., Kwikset
4 Corporation, Kwikset Locks, Inc., Black & Decker Inc., Pyro Spectaculars and Goodrich
5 Corporation to be received on April 17, 2007 and further reserve the right to offer any
6 portion of this deponent's transcript for impeachment and rebuttal purposes.

7
8 30. Dean Cordiano

9 Mr. Cordiano is a partner at the law firm of Day, Berry and Howard. His firm has
10 represented AHC as well as Emhart Corporation. The testimony Rialto intends to elicit
11 from Mr. Cordiano can be located at the following page numbers of Mr. Cordiano's
12 deposition: 15:11-16:8; 47:20-49:5; 204:2-25, 209:24-211:1. The subject areas covered
13 in the deposition are incorporated by reference. We reserve the right to supplement this
14 based on the case submission of Emhart Industries, Inc., Kwikset Locks, Inc., Kwikset
15 Corporation, Black & Decker Inc., Pyro Spectaculars and Goodrich Corporation to be
16 received on April 17, 2007 and further reserve the right to offer any portion of this
17 deponent's transcript for impeachment and rebuttal purposes.

18
19 31. Robert Parrett

20 Mr. Parrett is the former plant manager at KLI and a former member of its Board
21 of Directors. He will testify regarding the daily plant operations at KLI and AHC. The
22 testimony Rialto intends to elicit from Mr. Parrett can be located at the following page
23 numbers of Mr. Parrett's deposition: 80:23-83:22; 89:24-90:1; 92:6-24; 93:13-95:14;
24 99:11-100:24; 106:10-107:4; 169:10-18; 170:22-171:12; 305:16-25, 320:24-322:19.
25 The subject areas covered in the deposition are incorporated by reference. We reserve
26 the right to supplement this based on the case submission of Emhart Industries, Inc.,
27 Kwikset Corporation, Kwikset Locks, Inc., Black & Decker Inc., Pyro Spectaculars and

1 Goodrich Corporation to be received on April 17, 2007 and further reserve the right to
2 offer any portion of this deponent's transcript for impeachment and rebuttal purposes.

3
4
5 32. Robert Hutchinson

6 Mr. Hutchinson is a former accountant and director for KLI. He will testify
7 regarding the stock exchange between KLI and AHC as well as subsequent operations
8 at the companies. The testimony Rialto intends to elicit from Mr. Hutchinson can be
9 located at the following page numbers of Mr. Hutchinson's deposition: 53:4-20; 117:5-
10 17; 145:3-20; 150:16-151:3; 156:2-13; 403:15-404:2; 433:12-434:2; 436:4-23; 587:8-25;
11 604:25-606:11. The subject areas covered in the deposition are incorporated by
12 reference. We reserve the right to supplement this based on the case submission of
13 Emhart Industries, Inc., Kwikset Corporation, Kwikset Locks, Inc., Black & Decker Inc.,
14 Pyro Spectaculars and Goodrich Corporation to be received on April 17, 2007 and
15 further reserve the right to offer any portion of this deponent's transcript for
16 impeachment and rebuttal purposes.

17
18 33. Edgar Steinmeyer

19 Mr. Steinmeyer is a former professional quality engineer with KLI. He will testify
20 regarding the operations and practices at KLI and AHC. The testimony Rialto intends to
21 elicit from Mr. Steinmeyer can be located at the following page numbers of Mr.
22 Steinmeyer's deposition: 56:10-57:4; 66:11; 73:12; 83:21-86:12; 103:20-109:25;
23 117:10-13; 130:19-133:8, 202:18-203:3. The subject areas covered in the deposition
24 are incorporated by reference. We reserve the right to supplement this based on the
25 case submission of Emhart Industries, Inc., Kwikset Corporation, Kwikset Locks, Inc.,
26 Black & Decker Inc., Pyro Spectaculars and Goodrich Corporation to be received on
27 April 17, 2007 and further reserve the right to offer any portion of this deponent's
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1 transcript for impeachment and rebuttal purposes.

2
3 34. Earl Robinson

4 Mr. Robinson is a former assembly line worker from KLI. He will testify regarding
5 KLI's manufacturing of defense products. His testimony will also include his knowledge
6 of the chemicals used in the process and cleaning practices employed. The testimony
7 Rialto intends to elicit from Mr. Robinson can be located at the following page numbers
8 of Mr. Robinson's deposition: 24-26; 33:7-33:11; 39-40, 42:12-43:11; 51:6-52:14; 61:1-
9 62:4; 63:22-72:5; 95:21-96:22; 98:4-99:1; 99:25-100:12; 100:13-101:18; 101:20-102:2;
10 102:3-102:10; 102:12-104:10; 105:2-107:17; 109:8-112:23; 115, 130:2-130:13; 132:6-
11 138:7; 142:2-142:21; 152:24-153:16; 155:7-175:14; 185:1-189:16; 191:13-193:22;
12 198:6-205:16; 210:1-210:13; 213:3-215:15; 221:11-222:5; 222:7-223:22; 228:3-229:7;
13 230:6-231:4; 231:6-232:6; 244:23-245:4; 252:14-253:5; 267:22-270:6. The subject
14 areas covered in the deposition are incorporated by reference. We reserve the right to
15 supplement this based on the case submission of Emhart Industries, Inc., Kwikset
16 Locks, Inc., Kwikset Corporation, Kwikset Locks, Inc., Black & Decker Inc., Pyro
17 Spectaculars and Goodrich Corporation to be received on April 17, 2007 and further
18 reserve the right to offer any portion of this deponent's transcript for impeachment and
19 rebuttal purposes.

20
21 35. Linda Biagioni

22 Ms. Biagioni is a former Environmental Planning and Compliance Manager at
23 Emhart Corporation and is now the Director of Environmental Affairs with Black and
24 Decker Corporation. She will testify regarding the relationship between AHC and KLI as
25 well as their relationship to B&D. The testimony Rialto intends to elicit from Ms. Biagioni
26 can be located at the following page numbers of Ms. Biagioni's deposition: 33:10-33:21;
27 110:1-111:23; 153:18-154:22; 262:9-263:19; 341:23-342:13; 451:2-456:6. The subject
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1 areas covered in the deposition are incorporated by reference. We reserve the right to
2 supplement this based on the case submission of Emhart Industries, Inc., Kwikset
3 Corporation, Kwikset Locks, Inc., Black & Decker Inc., Pyro Spectaculars and Goodrich
4 Corporation to be received on April 17, 2007 and further reserve the right to offer any
5 portion of this deponent's transcript for impeachment and rebuttal purposes.
6

7 36. Mildred Wilkins

8 Ms. Wilkins is a former assembly line worker for WCLC. She will testify
9 regarding her experience with loading photoflash cartridges. She will also testify as to
10 her knowledge of perchlorate disposal practices and procedures at the Rialto plant. The
11 testimony Rialto intends to elicit from Mr. Ransom can be located at the following page
12 numbers of Mr. Ransom's deposition: 34:13-35:4; 38:3-40:4; 48:22-50:24; 88:3-94:10;
13 97:15-98:21; 115:21-118:25; 119:5-122:7; 139:25-141:6; 154:1-20. The subject areas
14 covered in the deposition are incorporated by reference. We reserve the right to
15 supplement this based on the case submission of Emhart Industries, Inc., Kwikset
16 Corporation, Kwikset Locks, Inc., Black & Decker Inc., Pyro Spectaculars and Goodrich
17 Corporation to be received on April 17, 2007 and further reserve the right to offer any
18 portion of this deponent's transcript for impeachment and rebuttal purposes.
19

20 37. Marshall Roop

21 Mr. Roop worked at Black and Decker Corporation (B&D), first in accounting and
22 then in risk management. He will testify regarding the November 1998 Settlement
23 Agreement as well as insurance coverage. The testimony Rialto intends to elicit from
24 Mr. Roop can be located at the following page numbers of Mr. Roop's deposition:
25 17:11-22; 30:20-31:5; 161:19-22. The subject areas covered in the deposition are
26 incorporated by reference. We reserve the right to supplement this based on the case
27 submission of Emhart Industries, Inc., Kwikset Corporation, Kwikset Locks, Inc., Black &
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1 Decker Inc., Pyro Spectaculars and Goodrich Corporation to be received on April 17,
2 2007 and further reserve the right to offer any portion of this deponent's transcript for
3 impeachment and rebuttal purposes.

4
5 38. Gary Duvall

6 Mr. Duvall is an attorney with the law firm of Miles & Stockbridge, which
7 represents Black & Decker on various corporate matters. He will testify regarding the
8 November 1998 Settlement Agreement as well as B & D subsidiaries. The testimony
9 Rialto intends to elicit from Mr. Duvall can be located at the following page numbers of
10 Mr. Duvall's deposition: 58:22-66:22; 67:17-71:5. The subject areas covered in the
11 deposition are incorporated by reference. We reserve the right to supplement this
12 based on the case submission of Emhart Industries, Inc., Kwikset Corporation, Kwikset
13 Locks, Inc., Black & Decker Inc., Pyro Spectaculars and Goodrich Corporation to be
14 received on April 17, 2007 and further reserve the right to offer any portion of this
15 deponent's transcript for impeachment and rebuttal purposes.

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17 39. Theodore Lutkus

18 Mr. Lutkus is former counsel for USM, a company that was acquired by Emhart
19 Corporation. He will testify regarding Black & Decker's acquisition of Emhart. The
20 testimony Rialto intends to elicit from Mr. Lutkus can be located at the following page
21 numbers of Mr. Lutkus' deposition: 4, 6-8, 16-21, 36-41, 50:8-51:25; 53-55, 110:25-
22 111:15; 161:6-162:21. The subject areas covered in the deposition are incorporated by
23 reference. We reserve the right to supplement this based on the case submission of
24 Emhart Industries, Inc., Kwikset Corporation, Kwikset Locks, Inc., Black & Decker Inc.,
25 Pyro Spectaculars and Goodrich Corporation to be received on April 17, 2007 and
26 further reserve the right to offer any portion of this deponent's transcript for
27 impeachment and rebuttal purposes.

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40. Robert Cattaneo

Mr. Cattaneo is an attorney with the firm of Miles & Stockbridge. He will testify regarding the relationship between KLI and AHC. The testimony Rialto intends to elicit from Mr. Cattaneo can be located at the following page numbers of Mr. Cattaneo's deposition: 59:4-60:10; 71:15-75:7; 94:17-96:21; 120:4-123:8; 131:19-135:3; 145:8-146:4; 161:19-165:5. The subject areas covered in the deposition are incorporated by reference. We reserve the right to supplement this based on the case submission of Emhart Industries, Inc., Kwikset Corporation, Kwikset Locks, Inc., Black & Decker Inc., Pyro Spectaculars and Goodrich Corporation to be received on April 17, 2007 and further reserve the right to offer any portion of this deponent's transcript for impeachment and rebuttal purposes.

41. Charles Fenton

Mr. Fenton is a former attorney with the firm of Miles & Stockbridge. He later became general counsel for Black & Decker, who was a client of his former firm. He will testify regarding his transactional representation of B&D and the November 1998 Settlement Agreement. The testimony Rialto intends to elicit from Mr. Fenton can be located at the following page numbers of Mr. Fenton's deposition: 57:1-25; 75:1-25. The subject areas covered in the deposition are incorporated by reference. We reserve the right to supplement this based on the case submission of Emhart Industries, Inc., Kwikset Locks, Inc., Kwikset Corporation, Black & Decker Inc., Pyro Spectaculars and Goodrich Corporation to be received on April 17, 2007 and further reserve the right to offer any portion of this deponent's transcript for impeachment and rebuttal purposes.

42. William Bruner

Mr. Bruner is a current officer of various B & D entities. He will testify regarding

1 the November 1998 Settlement Agreement as well as B & D subsidiaries; these subject
2 areas are incorporated by reference in his deposition transcript from February 28, 2006.
3 We reserve the right to supplement this based on the case submission of Emhart
4 Industries, Inc., Kwikset Locks, Inc., Kwikset Corporation, Black & Decker Inc., Pyro
5 Spectaculars and Goodrich Corporation to be received on April 17, 2007 and further
6 reserve the right to offer any portion of this deponent's transcript for impeachment and
7 rebuttal purposes.

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9 43. Custodian

10 Custodian of Goodrich-manufactured LOKI missile; Rialto Police Department.

11 44. Barbara McGee

12 Ms. McGee is the Rialto City Clerk. Her testimony will be used for the sole
13 purpose of authenticating Rialto's business records. She will testify that the documents
14 were made in the regular course of business and near the time of the activity or event
15 they describe.

16
17 45. Daniel B. Stephens (Expert)

18 Mr. Stephens is the principal hydrogeologist with Daniel B. Stephens &
19 Associates, Inc. He has a Bachelor of Science degree in geological science, a Master
20 of Science degree in hydrology and a doctorate in hydrology. He will testify regarding
21 his study and evaluation of the technical evidence justifying site investigation and
22 cleanup. He will also testify regarding the feasibility and propriety of cleanup and other
23 remediation requirements.

24
25 46. Michael McPherson (Expert)

26 Mr. McPherson is a water rights consultant having training and experience in the
27 fields of both engineering and law. He had a Bachelor of Science degree in mining
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1 engineering and has worked in various capacities as a mining engineer or construction
2 engineer. He also received a Juris Doctorate degree and was admitted to the California
3 Bar in 1979. Practicing first in the fields of mining and construction law, he has focused
4 primarily on the practice of water law in California. He will testify regarding services he
5 provided in the investigation of water resources available to City of Rialto and the
6 investigation of City of Rialto's water interests in Rialto-Colton Basin. His testimony will
7 also pertain to the water rights held by City of Rialto, including copies of governing court
8 judgments, agreements among various parties, and technical reports. Based upon his
9 services to Rialto in this capacity, he is familiar with City of Rialto's water rights and with
10 the water rights framework including the requirements for adequate water replacement.

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47. William Hunt (Expert)

Mr. Hunt is a California Registered Geologist #5079, Certified Hydrogeologist #104, Certified Engineering Geologist #1589, Certified Wastewater Treatment Plant Operator #III-3850 and Licensed Engineering Construction Contractor #781829. He has a Bachelor of Science Degree in Geology and has been working in the water treatment and subsurface remediation industries since 1977. He will testify about the technical consulting he provided to the City of Rialto with regard to the subsurface perchlorate problem and its effects on the water supply. He is qualified to describe the City's water supply system and the effects that perchlorate contamination is having on it. He is also qualified to describe the justification for a water replacement order and the minimum requirements of water replacement plans that will alleviate the supply shortfalls that the City is currently undergoing. His qualifications are based on his background in water treatment and groundwater remediation along with direct involvement with the City of Rialto since October 2003.

1 Dated: April 12, 2007

MORGAN MILLER BLAIR,
A LAW CORPORATION

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CHRISTIAN M. CARRIGAN
Attorneys for CITY OF RIALTO and RIALTO
UTILITY AUTHORITY

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