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**IN THE OFFICE OF THE STATE ENGINEER  
OF THE STATE OF NEVADA**

IN THE MATTER OF THE DETERMINATION  
OF THE RELATIVE RIGHTS IN AND TO ALL  
WATERS, BOTH SURFACE AND  
UNDERGROUND, LOCATED WITHIN  
DIAMOND VALLEY, HYDROGRAPHIC  
BASIN NO. 10-153, ELKO AND EUREKA  
COUNTIES, STATE OF NEVADA.

**DANIEL S. VENTURACCI AND AMANDA L. VENTURACCI'S WITNESS LIST**

COMES NOW, DANIEL S. VENTURACCI and AMANDA L. VENTURACCI ("Venturacci") by and through their counsel, PAUL G. TAGGART, ESQ., DAVID H. RIGDON, ESQ., and TIMOTHY D. O'CONNOR, ESQ., of the law firm of TAGGART & TAGGART, LTD., and hereby respectfully submits their witness list and summary of witnesses' testimony as required in the January 10, 2019, Notice of Hearing on Objections.

The following are summaries of the proposed testimonies of Venturacci's witnesses:

1. **Ramona Hage Morrison.** Ms. Morrison has an extensive background in ranching and conducting extensive research for ranches to determine historic ranch activities and operations in seven western states, including Nevada. If called to testify, Ms. Morrison may testify regarding her experience with title and operation research of ranches, evidence she has located regarding the Venturacci ranches in question, practices used to find such information including historic water use, historic ranching and agricultural practices of the Diamond Valley, Nevada, region, and vested water right information she has obtained. Ms. Morrison has drafted a report to coincide with her testimony that has been included in Venturacci's evidence submittal to the State Engineer. If Ms. Morrison is permitted to testify as an expert in this matter, Ms. Morrison would likely testify about her interpretation of ancient documents, published literature about the Diamond Valley, Nevada area, and historical ranching and farming practices in the Diamond Valley, Nevada, area.

2. **George M. Thiel, P.E.** Mr. Thiel is the principal engineer of Thiel Engineer Associates Inc. Mr. Thiel has been admitted as an expert on water rights and hydrology in many

State Engineer hearings and court proceedings. If called to testify, Mr. Thiel may testify regarding evidence reviewed to support Venturacci's vested claims, evidence reviewed to refute findings in the State Engineer's Preliminary Order of Determination, his opinion on the extent of the Venturacci vested claims, practices used to find such information including historic water use, historic ranching and agricultural practices of the Diamond Valley, Nevada, region, and the report and findings contained therein drafted by Mr. Thiel regarding the Venturacci ranches. Mr. Thiel has drafted a report to coincide with his testimony that has been included in Venturacci's evidence submittal to the State Engineer. Mr. Thiel's expert opinions may include interpretation of aerial photographs, maps and surveys, ancient documents, recorded documents, spring measurements and flow paths, water rights filings, duty, and published literature about the Diamond Valley, Nevada area.

3. **Terry Katzer.** Mr. Katzer is a consulting hydrogeologist. Mr. Katzer has been tendered as an expert in hydrology before the State Engineer and multiple courts in Nevada. If called to testify, he may testify regarding his personal and professional experience with the Diamond Valley, Nevada, region, his expertise in groundwater and surface water calculations and measurements, and his experience working for the United States Geological Survey in Diamond Valley, Nevada.

4. **Daniel S. Venturacci.** Mr. Venturacci is the co-owner of five ranches in Diamond Valley, Nevada, as well as multiple vested rights associated with his ranches and surrounding areas. If called to testify, he may testify regarding historical operations of his ranches, the current operations of the ranches, spring and stream locations, meadow locations, and evidence supporting his vested right claims.

5. **Amanda L. Venturacci.** Ms. Venturacci is the co-owner of five ranches in Diamond Valley, Nevada, as well as multiple vested rights associated with her ranches and surrounding areas. If called to testify, she may testify regarding historical operations of her ranches, the current operations of the ranches, spring and stream locations, meadow locations, and evidence supporting her vested right claims.

6. **Cliff Gardner.** Mr. Gardner is a long-time resident of the Diamond Valley, Nevada, region. If called to testify, he may testify regarding his family's knowledge of the historic ranching and farming practices in Diamond Valley, including an affidavit given by his mother prior to her death discussing the Diamond Valley region.

Venturacci reserves the right to identify additional witnesses and to call any witness from the witness lists submitted by any other party.

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TAGGART & TAGGART, LTD.  
108 North Minnesota Street  
Carson City, Nevada 89703  
(775) 882-9900 – Telephone  
(775) 883-9900 – Facsimile

By:   
PAUL G. TAGGART, ESQ.  
Nevada State Bar No. 6136  
DAVID H. RIGDON, ESQ.  
Nevada State Bar No. 13567  
TIMOTHY D. O'CONNOR, ESQ.  
Nevada State Bar No. 14098  
Attorneys for Daniel S. Venturacci and Amanda  
L. Venturacci