Qualifications of Henry House

Licensed Appraiser · Economist · Rural-Property Expert · Farmer House Agricultural Consultants

Winter 2025-2006

Keywords:—economist; lost profits; forensic appraiser; agricultural appraiser; rural appraiser; business valuation; crop loss; livestock valuation; foodstuff valuation; farming standard of care; agricultural dust; livestock standard of care; fencing; California Food & Agriculture Code section 17121; right to farm; eminent domain; econometrics.

Summary of professional expertise:—

- California appraiser's license number AG-3010876 (Certified General Appraiser). This is the highest level of licensing for a real-estate appraiser and additionally qualifies Mr. House to value business interests, intellectual property, and other specialized assets and to opine on appraisals by others (the service of appraisal review).
 - Agricultural economics and business lost profits; econometric controversies.
 - Value of lost crops, emblements, and foodstuff inventory.
- Farm management: good farming practices in or chards, such as almonds and walnuts, row crops.
- Livestock management: carrying capacity of land, range management, standard of care for grazing animals, fencing.
- Right-to-farm issues, e.g., vehicle-agriculture, vehicle-livestock conflicts in agricultural districts, feasibility of agriculture on urban-proximate lands.
- Appraisal: valuation in disputes concerning real property, valuation of agricultural and rural land, valuation of valuation of agricultural personal property (e.g., chattel), valuation of agricultural-commercial facilities (e.g., aquaculture), valuation of development rights, assessed-value analysis for assessment appeal.
- Condemnation: valuation services for this appraisal specialty, including severance damages, in support of eminent-domain litigation.
- Conservation projects: Mr. House has assisted numerous land trusts in establishing conservation easements, including The Nature Conservancy, Yolo Land Trust, Solano Land Trust, Agricultural-Natural Resources Trust, River Partners, and Sutter Buttes Regional Land Trust.
 - Management evaluation of commercial equestrian facilities.
 - Management of rural property.
- Statistical analysis, geographic-information-system (GIS) analysis, and software engineering (analytics).
- Expert services to litigation on the foregoing with deposition and trial-testimony experience; partial list of matters below. Qualified expert in the counties of Butte, Colusa, Kern, and Riverside.

Representative recently concluded matters in which Mr. Henry House was retained by counsel as a forensic expert:—

County of Tulare, October 2025.—Topic: econometrics · agricultural irrigation · evapotranspiration · water rights · California Sustainable Groundater Management Act (SGMA). Friant Water Authority v. Eastern Tule Groundwater Sustainability Agency (case no. VCU306343). A matter of claimed economic damages due to the defendant's method of charging and accounting for groundwater drawn from a regulated basis by its memners, primarily farms growing diverse crops. Scope included econometrics and expertise in farm management.

County of Sacramento, September 2025.—Topic: farming standard of care \cdot agricultural dust \cdot walnuts. Gerald Larson, et al. v. Robert Larson, et al. (Sacramento County case no. 34-2021-00294930, consolidated with 34-2021-00311331 and 34-2022-00327390). An auto-accident case wherein dust allegedly originating from the defendants' walnut orchard obscured

visibility on a public road, contributing to an accident with multiple vehicles involved. Mr. House was retained and designated to review the location of the incident, the crops and nature of agriculture in the area, and the standard of care used by the farming defendants, reasonableness of their actions, and their process for conducting agricultural operations, opining on the same and in rebuttal of other experts.

County of Wake, State of North Carolina, November 2024.—Topic: farm management, standard of care for labor contracting. Carlos Moreno, et al. v. Florida Orange Gold, LLC, José Javier Gutierrez, Gilberto Gutierrez, and Howell Farming Co., Inc. Mr. House was retained and designated for expertise on the client's standard of care in hiring contract labor in Wayne County, North Carolina. Plaintiff Moreno suffered a workplace injury, alleged to have been caused by heat sickness, while weeding watermelons as a contract laborer (as an employee of Florida Orange Gold) on the farmland of client Howell Farming Co. (defendant); the plaintiffs' cause of action against Howell was negligence. Mr. House opined on several controverted factual elements of the allegation of negligence, including the division of responsibility for workers' safety between farmlabor contractor (employer) and farmer hiring contract labor (nonemployer owner of the crop and possessor of the farmland), customary and accepted practices to manage risk of heat illness from hot weather, and whether summertime weeding in eastern North Carolina meets the characteristics of an "inherently dangerous activity" as defined by North Carolina law.

Federal venue, August 2024.—Topic: farm management, real-property rights. A federal-court matter, involving appraisal and farm-management expertise, which is confidential per our agreement with the client. This matter was venued in a federal district of California.

County of Sacramento, July 2024.—Topic: real-estate costs to cure · appraisal · conspiracy.—Robert Williams and Christina Williams v. Dynamic Asset Solutions, LLC, Prato Real Estate, Inc., Bricker Construction, Inc., and Finley Home Services, Inc., et al.. Mr. House was retained by Williams and opined in deposition on the fair market value of the subject property, a luxury home, in as-sold condition, its fair market value as if it had not suffered from damage discovered by buyer, and the market cost of repairs. Additional details on this matter are found in Mr. House's separately provided testimony list.

County of Los Angeles, March 2024.—Topic: real-estate appraisal. JP's Nevada Trust v. 2Bulls Conservation Ventures et al. Mr. House was retained by JP's Nevada Trust and opined on valuation methodology and opined the fair market value of three ranch properties at the times of three controverted transactions in service of the plaintiff in a dispute in which the buyer (plaintiff) alleged conspiracy to defraud and a pattern of racketeering activity in violation of 19 U.S.C. § 1962(c), the Racketeer Influenced and Corrupt Organizations Act (RICO). Additional details on this matter are found in Mr. House's separately provided testimony list.

County of Nevada, November 2023.—Topic: lost profits. Andrew Hainsworth, et al. v. Pacific Gas & Electric Company. A fire loss on a property in Rough and Ready. Mr. House was retained by Hainsworth and subsequently opined written findings regarding the plaintiff's lost profits from licensed Cannabis production in rural Nevada County, including an opinion on the market value of Nevada County-grown Cannabis relative to the market in aggregate.

County of Franklin, State of Washington, September 2023–June 2024.—Topic: real-estate appraisal. Ice Harbor Properties, LLC and Certain Underwriters Subscribing to Certificate No. XLS0342717 v. Agri Control Technologies, Inc. d.b.a. BTU Ventilation and Parrish Stakkeland (case no. 20-2-50118-11, Superior Court of the State of Washington, County of Franklin). A dispute over the compensation due by the defendants for the fire loss of the plaintiff's real property, a warehouse specialized for climate-controlled bulk storage of potatoes and onions. The plaintiffs retained and designated Mr. House as a rebuttal witness to opine on the fair market value of the lost building, the market for similar buildings, and other experts' opinions.

County of Tulare, July 2023.—Topic: livestock economics · real-estate appraisal. *Jones, et al. v. Pleasant Valley Canal Company, et al.* (Tulare County Superior Court case no. VCU274417). A dispute over a cattle-ranching and hay-growing operation which the plaintiffs alleged had been damaged by the operation of a canal crossing the plaintiffs' property. The scope for which

Mr. House was retained and designated by the defendants included analyzing the plaintiffs' alleged diminution of value of real estate, analyzing the plaintiffs' alleged economic loss from death of cattle, and opining on the water company's standard of care in maintenance of its canal. Additionally, I assisted retaining counsel to engage an expert in veterinary pathology.

County of Minidoka, State of Idaho, March–August 2023.—Topic: standard of care for livestock fencing. *Michael O. Ottley v. Hanssen et al.* (case no. CV34-21-00168, District Court of the Fifth Judicial District of the State of Idaho). An auto-accident case wherein the defendants' cattle had escaped onto a public road and been struck by the plaintiff in rural Minidoka County, Idaho. The defendants retained and designated Mr. House to analyze the defendants' standard of care in managing the cattle, to opine on the quality of the defendants' fencing in comparison to locally accepted standards of adequacy, and for rebuttal of the plaintiff's fencing expert.

County of Imperial, November 2022–February 2024.—Topic: agricultural economics · hay. Freddi Abatti et al. v. James Davis, et al. (Imperial County Superior Court case no. ECU002597). The defendants retained and designated Mr. House to evaluate the lost profits in hay crops in Imperial County resulting from a fire.

County of Merced, September 2022–January 2024.—Topic: agricultural economics · lost profits · almonds. Athwal Investments et al. v. San Luis Pump Co. et al. (case no. 20CV03787). A matter of almond trees in Merced County allegedly damaged consequent to lack of irrigation water. Scope included analysis of the economic lost profits from orchard trees lost and replanted as well as from lost yield in service of two defendants.

See also.—Mr. House's separately provided list of testimonies lists additional matters.

Partial list of management-consulting assignments:—

- Numerous consulting assignments for Leland Stanford Junior University on the management of its agricultural lands, which feature cattle, horses, and vegetable crops. Topics addressed have included livestock standard of care, carrying capacity of lands, safety of animals, safety of structures, and management of drainage and water quality.
- Consulting farm management for John and Marie Cronin Trust B, a landowner near Rio Vista, California. Lands were utilized for cattle grazing.
- Numerous appraisal assignments of farmland and rangeland properties utilized for crops and livestock (cattle, sheep, and aquaculture).
 - A list of additional management-consulting clients served available on request.

Experience:—

Agricultural consultant, appraiser, consulting agricultural economist.— House Agricultural Consultants, providing agricultural science, economics, management, and appraisal services. 2000–present.

Farmer.— Coco Ranch, a family farm growing organic apples, peaches, cherries, and field crops and raising sheep, poultry, and goats. 2000–present.

Education:—

- B.S., "Natural History", University of California, Davis, 1999, with Honors. Coursework in agronomy, botany, ecology, entomology, geology, hydrology, nematology, plant pathology, soil biology, sustainable agriculture, statistics, and wildlife biology.
- Numerous courses of the American Society of Farm Managers & Rural Appraisers (ASFMRA) regarding farm management, agricultural consulting, and appraisal. Recently completed: *Livestock Ranch Seminar* (February 15, 2024) and *Appraisal of Water Rights Seminar* (March 8, 2024), both in ASFMRA's appraisal-education series.
 - Numerous courses of the Appraisal Institute regarding real-estate appraisal.
 - Courses from Savory Institute regarding livestock management.

Appointments & activities:—

- Member, Solano County Farm Bureau.
- Member, American Society of Farm Managers & Rural Appraisers.
- Board of Directors, Davis Media Access, Davis, California, 2014–2017.
- Board of Directors, Davis Farmers Market Association, 2001–2003.

- Assistant instructor, "Principles of Farm Management", course M-10, an Internet course of the American Society of Farm Managers & Rural Appraisers, 1999–2003.
- Course proctor, "M-25: Enhanced Client Services", an Internet course of the American Society of Farm Managers & Rural Appraisers, 1999–2003.

Publications & speaking engagements:—

- Lecturer/instructor, "Farm Management", course ARE 140, and "Appraisal of Farms & Rural Resources", course ARE 145, University of California–Davis, 2015–present.
- Principles of Farm Management, Course M-10, a 40-hour professional credit Internet educational offering of the American Society of Farm Managers & Rural Appraisers
- Educational speaker at the annual meeting of the California Chapter of the American Society of Farm Managers & Rural Appraisers, November 19, 2021, Coalinga, California. Topic: valuation of conservation easements.