

5 El Dorado 10

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Eldorado Mutual Water Co., Landale Mutual Water  
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Co., and White Fence Farms Mutual Water Co., Inc.,  
[Six of the 16 Mutual Water Companies that Comprise  
A. V. United Mutual Group]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
IN AND FOR THE COUNTY OF LOS ANGELES**

Coordination Proceeding  
Special Title (Rule 1550(b))

) Judicial Council Coordination  
) Proceeding No. 4408

**ANTELOPE VALLEY GROUNDWATER  
CASES**

) Santa Clara Case No. 1-05-CV-049053  
) Assigned to the Honorable Jack Komar  
) Department 17C

Including Consolidated Actions:

**Los Angeles County Waterworks District  
No. 40 v. Diamond Farming Co.**  
Superior Court of California, County of Los  
Angeles, Case No. BC 325 201

) **RESPONSES TO ANTELOPE VALLEY-  
EAST KERN WATER AGENCY'S FIRST  
SET OF SPECIAL INTERROGATORIES  
PROPOUNDED TO CROSS-  
DEFENDANTS / CROSS-  
COMPLAINANTS, ELDORADO  
MUTUAL WATER CO., LANDALE  
MUTUAL WATER CO., SHADOW  
ACRES MUTUAL WATER CO.,  
SUNNYSIDE FARMS MUTUAL WATER  
CO., WESTSIDE PARK MUTUAL  
WATER CO., AND WHITE FENCE  
FARMS MUTUAL WATER CO., INC.,  
[SIX OF THE 16 MUTUAL WATER  
COMPANIES THAT COMPRISE A. V.  
UNITED MUTUAL GROUP]**

**Los Angeles County Waterworks District  
No. 40 v. Diamond Farming Co.**  
Superior Court of California, County of Kern,  
Case No. S-1500-CV-254-348

**Wm. Bolthouse Farms, Inc. v. City of  
Lancaster**  
**Diamond Farming Co. v. City of Lancaster**  
**Diamond Farming Co. v. Palmdale Water  
Dist.**

Superior Court of California, County of  
Riverside, consolidated actions, Case Nos. RIC  
353 840, RIC 344 436, RIC 344 668

) For Court's Use Only:  
) Santa Clara County  
) Case No. 1-05-CV-049053  
) (For E-Posting/E-Service Purposes Only)

**AND RELATED ACTIONS.**

1           **PROPOUNDING PARTY:** Antelope Valley-East Kern Water Agency

2           **RESPONDING PARTIES:** Eldorado Mutual Water Co., Landale Mutual Water Co.,  
3 Shadow Acres Mutual Water Co., Sunnyside Farms Mutual Water Co., Westside Park Mutual  
4 Water Co., and White Fence Farms Mutual Water Co., Inc., [Six of the 16 Mutual Water  
5 Companies that Comprise A. V. United Mutual Group]

6           **SET NO.:**     ONE

7  
8           **TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:**

9           Cross-Defendants / Cross-Complainants, Eldorado Mutual Water Co., Landale Mutual  
10 Water Co., Shadow Acres Mutual Water Co., Sunnyside Farms Mutual Water Co., Westside  
11 Park Mutual Water Co., and White Fence Farms Mutual Water Co., Inc. [which are six of the 16  
12 mutual water companies that comprise A. V. UNITED MUTUAL GROUP], by and through their  
13 attorneys of record, Gresham Savage Nolan & Tilden, PC, by Michael Duane Davis, Marlene L.  
14 Allen-Hammarlund, and Derek R. Hoffman submit the following response to Antelope Valley-  
15 East Kern Water Agency's First Set of Special Interrogatories, pursuant to the provisions of  
16 *Code of Civil Procedure* section 2030.010, as follows:

17           It should be noted that these responding parties have not fully completed their  
18 investigation of the facts relating to this case, and have not fully completed their discovery in this  
19 action and have not completed their preparation for the trial. All of the answers contained herein  
20 are based upon such information and documents which are presently available to and specifically  
21 known to these responding parties and disclose only those contentions which presently occur to  
22 such responding parties. It is anticipated that further discovery, independent investigation, legal  
23 research and analysis will supply additional facts, add meaning to the known facts, as well as  
24 establish entirely new factual conclusions and legal contentions, all of which may lead to  
25 substantial additions to, changes in, and variations from the contentions herein set forth. The  
26 following interrogatory responses are given without prejudice to responding parties' right to  
27 produce evidence of any subsequently discovered fact or facts which these responding parties

1 may later recall. Responding parties accordingly reserve the right to change any and all answers  
2 herein as additional facts are ascertained, analysis are made, legal research is completed and  
3 contentions are made. The answers contained herein are made in a good faith effort to supply as  
4 much factual information and as much specification of legal contentions as is presently known  
5 but should in no way be to the prejudice of the responding party in relation to further discovery,  
6 research or analysis.

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**EL DORADO MUTUAL WATER COMPANY:**

**SPECIAL INTERROGATORY NO. 1:**

Do YOU contend that YOU have the right to recapture or use the return flows resulting from State Water Project water AVEK imports into the area of adjudication?

**RESPONSE TO SPECIAL INTERROGATORY NO. 1:**

This responding party objects to this interrogatory in that it calls for a legal conclusion and information that is protected by the attorney work product doctrine. This responding party further objects to this interrogatory on the grounds that this responding party has not yet completed discovery and has not yet completed preparation for trial. Without waiving its objections, this responding party responds as follows: Yes, with regard to the State Water Project water acquired and delivered pursuant to the agreements between this responding party, AVEK and Palmdale Water District.

**SPECIAL INTERROGATORY NO. 2:**

Set forth all facts which support YOUR response to Special Interrogatory No. 1 above.

**RESPONSE TO SPECIAL INTERROGATORY NO. 2:**

This responding party objects to this interrogatory on the grounds that this responding party has not yet completed discovery and has not yet completed preparation for trial. This responding party further objects to this interrogatory on the grounds that it seeks information and documents equally available to and in the possession of the propounding party. Without waiving its objections, this responding party responds as follows: This responding party purchases State Water Project water that it delivers to its members. In addition, this Mutual Water Company is within the jurisdictional boundaries of the Palmdale Water District; however, due to delivery difficulties, this Mutual Water Company has entered into a three way contract with AVEK and Palmdale Water District, pursuant to which, Palmdale Water District has delivered quantities of its annual State Water Project entitlement to AVEK, which has treated and delivered said water

1 to this Mutual Water Company, for which payment is made to AVEK, a portion of which  
2 payment is returned to Palmdale Water District for the quantity of its State Water Project Water.  
3 This Mutual Water Company is informed and believes that the cost assessed by AVEK and paid  
4 by this Mutual Water Company includes a component charge for the construction, operation and  
5 maintenance of AVEK's infrastructure, for Palmdale Water District's State Water Project  
6 entitlements, and for AVEK's and Palmdale Water District's administrative and operational  
7 costs, for capacity fees, and for AVEK's treatment and delivery of Palmdale Water District's  
8 State Water Project water in the quantities reported.

9  
10 **SPECIAL INTERROGATORY NO. 3:**

11 Describe in detail all WRITINGS which support YOUR response to Special Interrogatory  
12 No. 1 above.

13 **RESPONSE TO SPECIAL INTERROGATORY NO. 3:**

14 This responding party objects to this interrogatory on the grounds that it is overbroad and  
15 the documents requested are equally available to the propounding party, and, to the extent the  
16 documents are not available, it would be unduly burdensome and oppressive for this responding  
17 party to obtain the documents. This responding party further objects to this interrogatory on the  
18 grounds that the documents have already been produced, have been posted to the Court's  
19 website, or are protected by the attorney-client privilege, attorney work product doctrine, or the  
20 right of privacy. This responding party further objects to this interrogatory on the grounds that  
21 this responding party has not yet completed discovery and has not yet completed preparation for  
22 trial.

23  
24 **SPECIAL INTERROGATORY NO. 4:**

25 Do you contend that YOU have a right to return flows presently in the groundwater  
26 which result from State Water Project water AVEK has imported into the area of adjudication?

1 **RESPONSE TO SPECIAL INTERROGATORY NO. 4:**

2 This responding party objects to this interrogatory in that it calls for a legal conclusion  
3 and information that is protected by the attorney work product doctrine and the attorney-client  
4 privilege. This responding party further objects to this interrogatory on the grounds that this  
5 responding party has not yet completed discovery and has not yet completed preparation for trial.  
6 Without waiving its objections, this responding party responds as follows: Yes.

7  
8 **SPECIAL INTERROGATORY NO. 5:**

9 Set forth the amount of return flows presently in the groundwater as a result of State  
10 Water Project water AVEK has imported to which you claim a right to recapture or use.

11 **RESPONSE TO SPECIAL INTERROGATORY NO. 5:**

12 This responding party objects to this interrogatory in that it calls for a legal conclusion,  
13 expert opinion, and/or information that is protected by the attorney work product doctrine and  
14 the attorney-client privilege. This responding party further objects to this interrogatory on the  
15 grounds that this responding party has not yet completed discovery and has not yet completed  
16 preparation for trial, and that the information sought is equally in the possession of or equally  
17 available to the propounding party.

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19 **SPECIAL INTERROGATORY NO. 6:**

20 Set forth all facts supporting your response to Special Interrogatory No. 5 above.

21 **RESPONSE TO SPECIAL INTERROGATORY NO. 6:**

22 This responding party objects to this interrogatory on the grounds that this responding  
23 party has not yet completed discovery and has not yet completed preparation for trial. This  
24 responding party further objects to this interrogatory on the grounds that it seeks information and  
25 documents equally available to and in the possession of the propounding party. This responding  
26 party objects to this interrogatory in that it calls for a legal conclusion, expert opinion, and/or

1 information that is protected by the attorney work product doctrine and the attorney-client  
2 privilege.

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4 **SPECIAL INTERROGATORY NO. 7:**

5 Describe in detail all WRITINGS supporting your response to Special Interrogatory No.  
6 5 above.

7 **RESPONSE TO SPECIAL INTERROGATORY NO. 7:**

8 This responding party objects to this interrogatory on the grounds that it is overbroad and  
9 the documents requested are equally available to the propounding party, and, to the extent the  
10 documents are not available, it would be unduly burdensome and oppressive for this responding  
11 party to obtain the documents. This responding party further objects to this interrogatory on the  
12 grounds that the documents have already been produced, have been posted to the Court's  
13 website, or are protected by the attorney-client privilege, attorney work product doctrine, or the  
14 right of privacy. This responding party further objects to this interrogatory on the grounds that  
15 this responding party has not yet completed discovery and has not yet completed preparation for  
16 trial.

17  
18 **SPECIAL INTERROGATORY NO. 8:**

19 Have YOU pumped return flows from State Water Project water AVEK has imported  
20 into the area of adjudication?

21 **RESPONSE TO SPECIAL INTERROGATORY NO. 8:**

22 This responding party objects to this interrogatory in that it calls for a legal conclusion,  
23 expert opinion, and/or information that is protected by the attorney work product doctrine and  
24 the attorney-client privilege. This responding party further objects to this interrogatory on the  
25 grounds that this responding party has not yet completed discovery and has not yet completed  
26 preparation for trial. Without waiving its objections, this responding party responds as follows:  
27 Yes.



1 **SPECIAL INTERROGATORY NO. 9:**

2 Set forth all facts supporting YOUR response to Special Interrogatory No. 8 above.

3 **RESPONSE TO SPECIAL INTERROGATORY NO. 9:**

4 This responding party objects to this interrogatory on the grounds that this responding  
5 party has not yet completed discovery and has not yet completed preparation for trial. This  
6 responding party further objects to this interrogatory on the grounds that it seeks information and  
7 documents equally available to and in the possession of the propounding party.

8  
9 **SPECIAL INTERROGATORY NO. 10:**

10 Describe in detail all WRITINGS supporting YOUR response to Special Interrogatory  
11 No. 8 above.

12 **RESPONSE TO SPECIAL INTERROGATORY NO. 10:**

13 This responding party objects to this interrogatory on the grounds that it is overbroad and  
14 the documents requested are equally available to the propounding party, and, to the extent the  
15 documents are not available, it would be unduly burdensome and oppressive for this responding  
16 party to obtain the documents. This responding party further objects to this interrogatory on the  
17 grounds that the documents have already been produced, have been posted to the Court's  
18 website, or are protected by the attorney-client privilege, attorney work product doctrine, or the  
19 right of privacy. This responding party further objects to this interrogatory on the grounds that  
20 this responding party has not yet completed discovery and has not yet completed preparation for  
21 trial.

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23 **SPECIAL INTERROGATORY NO. 11:**

24 Prior to January 18, 2006, did YOU participate in any communication with AVEK  
25 regarding the right to use return flows from State Water Project water AVEK imports into the  
26 area of adjudication?

1 **RESPONSE TO SPECIAL INTERROGATORY NO. 11:**

2 This responding party objects to this interrogatory on the grounds that this responding  
3 party has not yet completed discovery and has not yet completed preparation for trial. This  
4 responding party further objects to this interrogatory on the grounds that it seeks information and  
5 documents equally available to and in the possession of the propounding party.

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7 **SPECIAL INTERROGATORY NO. 12:**

8 Set forth all facts upon which YOUR response to Special Interrogatory No. 11 is based.

9 **RESPONSE TO SPECIAL INTERROGATORY NO. 12:**

10 This responding party objects to this interrogatory on the grounds that this responding  
11 party has not yet completed discovery and has not yet completed preparation for trial. This  
12 responding party further objects to this interrogatory on the grounds that it seeks information and  
13 documents equally available to and in the possession of the propounding party. This responding  
14 party further objects to this interrogatory on the grounds that it seeks information protected by  
15 the attorney-client privilege and attorney work product privilege.

16  
17 **SPECIAL INTERROGATORY NO. 13:**

18 Describe in detail all WRITINGS which support YOUR response to Special Interrogatory  
19 No. 11.

20 **RESPONSE TO SPECIAL INTERROGATORY NO. 13:**

21 This responding party objects to this interrogatory on the grounds that it is overbroad and  
22 the documents requested are equally available to the propounding party, and, to the extent the  
23 documents are not available, it would be unduly burdensome and oppressive for this responding  
24 party to obtain the documents. This responding party further objects to this interrogatory on the  
25 grounds that the documents have already been produced, have been posted to the Court's  
26 website, or are protected by the attorney-client privilege, attorney work product doctrine, or the

1 right of privacy. This responding party objects to this interrogatory on the grounds that this  
2 responding party has not yet completed discovery and has not yet completed preparation for trial.  
3

4 **SPECIAL INTERROGATORY NO. 14:**

5 Have YOU ever attempted to recapture or use return flows from State Water Project  
6 water AVEK has imported into the area of adjudication?

7 **RESPONSE TO SPECIAL INTERROGATORY NO. 14:**

8 This responding party objects to this interrogatory in that it calls for a legal conclusion,  
9 expert opinion, and/or information that is protected by the attorney work product doctrine and  
10 the attorney-client privilege. This responding party further objects to this interrogatory on the  
11 grounds that this responding party has not yet completed discovery and has not yet completed  
12 preparation for trial. Without waiving its objections, this responding party responds as follows:  
13 Yes.  
14

15 **SPECIAL INTERROGATORY NO. 15:**

16 Set forth all facts supporting YOUR response to Special Interrogatory No. 14.

17 **RESPONSE TO SPECIAL INTERROGATORY NO. 15:**

18 This responding party objects to this interrogatory on the grounds that this responding  
19 party has not yet completed discovery and has not yet completed preparation for trial. This  
20 responding party further objects to this interrogatory on the grounds that it seeks information and  
21 documents equally available to and in the possession of the propounding party. This responding  
22 party further objects to this interrogatory on the grounds that it seeks information protected by  
23 the attorney-client privilege and attorney work product privilege. Without waiving said  
24 objections, this responding party has voluntarily purchased State Water Project water, in the  
25 amounts reported, and produced the return flows from said State Water Project water.  
26  
27

1 **SPECIAL INTERROGATORY NO. 16:**

2 Describe in detail all WRITINGS which support YOUR response to Special Interrogatory  
3 No. 14.

4 **RESPONSE TO SPECIAL INTERROGATORY NO. 16:**

5 This responding party objects to this Special Interrogatory on the grounds that it is  
6 overbroad and the documents requested are equally available to the propounding party, and, to  
7 the extent the documents are not available, it would be unduly burdensome and oppressive for  
8 this responding party to obtain the documents. This responding party further objects to this  
9 Special Interrogatory on the grounds that the documents have already been produced, have been  
10 posted to the Court's website, or are protected by the attorney-client privilege, attorney work  
11 product doctrine, or the right of privacy.  
12

13 **SPECIAL INTERROGATORY NO. 17:**

14 If YOUR answer to Special Interrogatory No. 14 is anything other than "yes," explain in  
15 detail the reason(s) why YOU have not attempted to recapture or use return flows resulting from  
16 State Water Project water AVEK has imported into the area of adjudication.

17 **RESPONSE TO SPECIAL INTERROGATORY NO. 17:**

18 This responding party objects to this interrogatory in that it calls for a legal conclusion,  
19 expert opinion, and/or information that is protected by the attorney work product doctrine and  
20 the attorney-client privilege. This responding party further objects to this interrogatory on the  
21 grounds that this responding party has not yet completed discovery and has not yet completed  
22 preparation for trial.  
23

24 **SPECIAL INTERROGATORY NO. 18:**

25 In any non-privileged WRITINGS YOU have prepared from 1974 to present (excluding  
26 pleadings filed in this Action), have YOU stated that return flows from State Water Project  
27 water AVEK imports into the area of adjudication is a source of water available to YOU?

1 **RESPONSE TO SPECIAL INTERROGATORY NO. 18:**

2 This responding party objects to this interrogatory on the grounds that it is overbroad and  
3 the documents requested are equally available to the propounding party, and, to the extent the  
4 documents are not available, it would be unduly burdensome and oppressive for this responding  
5 party to obtain the documents. This responding party further objects to this interrogatory on the  
6 grounds that the documents have already been produced, have been posted to the Court's  
7 website, or are protected by the attorney-client privilege, attorney work product doctrine, or the  
8 right of privacy. This responding party also objects to this interrogatory in that it calls for a legal  
9 conclusion, expert opinion, and/or information that is protected by the attorney work product  
10 doctrine and the attorney-client privilege.

11  
12 **SPECIAL INTERROGATORY NO. 19:**

13 If YOUR answer to Special Interrogatory No. 18 is anything other than an unqualified  
14 "no," then describe in detail the WRITINGS wherein YOU stated that return flows from State  
15 Water Project water AVEK imports into the area of adjudication is a source of water available to  
16 YOU.

17 **RESPONSE TO SPECIAL INTERROGATORY NO. 19:**

18 This responding party objects to this interrogatory on the grounds that it is overbroad and  
19 the documents requested are equally available to the propounding party, and, to the extent the  
20 documents are not available, it would be unduly burdensome and oppressive for this responding  
21 party to obtain the documents. This responding party further objects to this interrogatory on the  
22 grounds that the documents have already been produced, have been posted to the Court's  
23 website, or are protected by the attorney-client privilege, attorney work product doctrine, or the  
24 right of privacy.

1 **SPECIAL INTERROGATORY NO. 20:**

2 If YOUR answer to Special Interrogatory No. 18 is anything other than an unqualified  
3 “yes,” then explain in detail why WRITINGS prepared by YOU have never stated that return  
4 flows from State Project Water AVEK imports into the area of adjudication is a source of water  
5 available to YOU.

6 **RESPONSE TO SPECIAL INTERROGATORY NO. 20::**

7 This responding party objects to this interrogatory on the grounds that it is overbroad and  
8 the documents requested are equally available to the propounding party, and, to the extent the  
9 documents are not available, it would be unduly burdensome and oppressive for this responding  
10 party to obtain the documents. This responding party further objects to this interrogatory on the  
11 grounds that the documents have already been produced, have been posted to the Court’s  
12 website, or are protected by the attorney-client privilege, attorney work product doctrine, or the  
13 right of privacy. This responding party further objects to this interrogatory in that it calls for a  
14 legal conclusion and/or expert opinion.

15  
16 **SPECIAL INTERROGATORY NO. 21:**

17 As to each admission request served concurrently herewith to which YOU do not provide  
18 an unqualified admission, separately set forth all facts upon which YOUR denial of the  
19 admission request is based.

20 **RESPONSE TO SPECIAL INTERROGATORY NO. 21:**

21 This responding party objects to this interrogatory on the grounds that it has not yet  
22 completed its discovery and investigation of the facts in this matter; on the grounds that it seeks  
23 information protected by the attorney-client privilege, the attorney work product doctrine, and  
24 the right of privacy; and is overly broad, unduly burdensome and oppressive in that the  
25 information, persons and documents that are responsive to this interrogatory are numerous and  
26 are equally within the knowledge and availability of the propounding party. Without waiving  
27 this objection, this responding party will produce the documents it has located that are in its

1 possession that are responsive to this interrogatory. The individuals with the most knowledge  
2 regarding this information have been disclosed in the witness designations.

3  
4 **SPECIAL INTERROGATORY NO. 22:**

5 As to each admission request served concurrently herewith to which YOU do not provide  
6 an unqualified admission, identify in detail all WRITINGS which support YOUR denial of the  
7 admission request.

8 **RESPONSE TO SPECIAL INTERROGATORY NO. 22:**

9 This responding party objects to this interrogatory on the grounds that it has not yet  
10 completed its discovery and investigation of the facts in this matter; on the grounds that it seeks  
11 information protected by the attorney-client privilege, the attorney work product doctrine, and  
12 the right of privacy; and is overly broad, unduly burdensome and oppressive in that the  
13 information, persons and documents that are responsive to this interrogatory are numerous and  
14 are equally within the knowledge and availability of the propounding party. Without waiving  
15 this objection, this responding party will produce the documents it has located that are in its  
16 possession that are responsive to this interrogatory. The individuals with the most knowledge  
17 regarding this information have been disclosed in the witness designations.

18  
19 **SPECIAL INTERROGATORY NO. 23:**

20 Have YOU constructed or developed any wells, a purpose of which was to recapture  
21 return flows from State Water Project water AVEK imports into the area of adjudication?

22 **RESPONSE TO SPECIAL INTERROGATORY NO. 23:**

23 This responding party objects to this interrogatory in that it calls for a legal conclusion,  
24 expert opinion, and/or information that is protected by the attorney work product doctrine and  
25 the attorney-client privilege. This responding party further objects to this interrogatory on the  
26 grounds that this responding party has not yet completed discovery and has not yet completed  
27 preparation for trial. This responding party objects to this interrogatory in that it calls for a legal

1 conclusion, expert opinion, and/or information that is protected by the attorney work product  
2 doctrine and the attorney-client privilege.

3  
4 **SPECIAL INTERROGATORY NO. 24:**

5 Set forth all facts supporting YOUR response to Special Interrogatory No. 23.

6 **RESPONSE TO SPECIAL INTERROGATORY NO. 24:**

7 This responding party objects to this interrogatory in that it calls for a legal conclusion,  
8 expert opinion, and/or information that is protected by the attorney work product doctrine and  
9 the attorney-client privilege. This responding party further objects to this interrogatory on the  
10 grounds that this responding party has not yet completed discovery and has not yet completed  
11 preparation for trial.

12  
13 **SPECIAL INTERROGATORY NO. 25:**

14 Describe in detail all WRITINGS which support your response to Special Interrogatory  
15 No. 23.

16 **RESPONSE TO SPECIAL INTERROGATORY NO. 25:**

17 This responding party objects to this interrogatory in that it calls for a legal conclusion,  
18 expert opinion, and/or information that is protected by the attorney work product doctrine and  
19 the attorney-client privilege. This responding party further objects to this interrogatory on the  
20 grounds that this responding party has not yet completed discovery and has not yet completed  
21 preparation for trial.



1 Verification by Authorized Individual:

2 Declaration under Penalty of Perjury:

3 I, Jeanne Miller, am the Secretary and Treasurer of the El Dorado Mutual Water  
4 Company and have personal knowledge of the facts set forth above.

5 If called to do so, I could and would competently testify to these facts under oath. I  
6 declare under penalty of perjury under the laws of the State of California that the foregoing is  
7 true and correct.

8 Executed this 5<sup>th</sup> day of December, 2013 at Palmdale, CA.

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11 JEANNE MILLER

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RIVERSIDE, CA 92501-3335  
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-16-

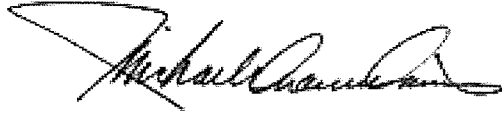
ANTELOPE VALLEY UNITED MUTUAL GROUP'S RESPONSES TO ANTELOPE VALLEY-EAST  
KERN WATER AGENCY'S FIRST SET OF SPECIAL INTERROGATORIES

1 SIGNED BY ATTORNEY AS TO OBJECTIONS ONLY.

2  
3 DATED: December 5, 2013

Respectfully submitted,

4 GRESHAM SAVAGE NOIAN & TIDEN, PC

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6  
7 By: \_\_\_\_\_

8 MICHAEL DUANE DAVIS, ESQ.

9 MARLENE L. ALLEN-HAMMARLUND, ESQ.

DEREK R. HOFFMAN, EQ.

10 Attorneys for CROSS-DEFENDANT / CROSS-  
11 COMPLAINANT, A. V. UNITED MUTUAL GROUP  
12 and Cross-Defendants, ADAMS BENNETT  
13 INVESTMENTS, LLC; MIRACLE IMPROVEMENT  
14 CORPORATION dba GOLDEN SANDS MOBILE  
15 HOME PARK, aka GOLDEN SANDS TRAILER  
16 PARK, named as ROE 1121; ST. ANDREW'S  
17 ABBEY, INC., named as ROE 623; SERVICE ROCK  
18 PRODUCTS, L.P.; and SHEEP CREEK WATER  
19 COMPANY, INC.

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**PROOF OF SERVICE**

**STATE OF CALIFORNIA, COUNTY OF SAN BERNARDINO**

Re: *ANTELOPE VALLEY GROUNDWATER CASES*  
Los Angeles County Superior Court Judicial Council Coordinated  
Proceedings No. 4408; Santa Clara County Superior Court Case No. 1-05-CV-049053

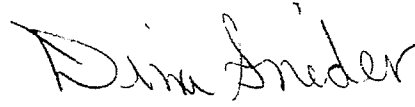
I am employed in the County of San Bernardino, State of California. I am over the age of 18 years and not a party to the within action; my business address is: 550 East Hospitality Lane, Suite 300, San Bernardino, CA 92408-4205.

On December 6, 2013, I served the foregoing document(s) described as **RESPONSES TO ANTELOPE VALLEY-EAST KERN WATER AGENCY'S FIRST SET OF SPECIAL INTERROGATORIES PROPOUNDED TO CROSS-DEFENDANTS / CROSS-COMPLAINANTS, ELDORADO MUTUAL WATER CO., LANDALE MUTUAL WATER CO., SHADOW ACRES MUTUAL WATER CO., SUNNYSIDE FARMS MUTUAL WATER CO., WESTSIDE PARK MUTUAL WATER CO., AND WHITE FENCE FARMS MUTUAL WATER CO., INC., [SIX OF THE 16 MUTUAL WATER COMPANIES THAT COMPRISE A. V. UNITED MUTUAL GROUP]** on the interested parties in this action in the following manner:

( X ) **BY ELECTRONIC SERVICE** – I posted the document(s) listed above to the Santa Clara County Superior Court website, <http://www.scefiling.org>, in the action of the Antelope Valley Groundwater Cases,

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on December 6, 2013, at San Bernardino, California.



DINA M. SNIDER