

5 White Fence Farms 22

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5 Attorneys for Cross-Defendants/Cross-Complainants,
 6 Eldorado Mutual Water Co., Landale Mutual Water
 7 Co., Shadow Acres Mutual Water Co., Sunnyside
 8 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]

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

12)	
13	Coordination Proceeding)	Judicial Council Coordination
	Special Title (Rule 1550(b)))	Proceeding No. 4408
14	ANTELOPE VALLEY GROUNDWATER)	Santa Clara Case No. 1-05-CV-049053
15	CASES)	Assigned to the Honorable Jack Komar
)	Department 17C
16	Including <u>Consolidated</u> Actions:)	
17	Los Angeles County Waterworks District)	RESPONSES TO ANTELOPE VALLEY-
18	No. 40 v. Diamond Farming Co.)	EAST KERN WATER AGENCY'S FIRST
	Superior Court of California, County of Los)	SET OF SPECIAL INTERROGATORIES
19	Angeles, Case No. BC 325 201)	PROPOUNDED TO CROSS-
20)	DEFENDANTS / CROSS-
21	Los Angeles County Waterworks District)	COMPLAINANTS, ELDORADO
22	No. 40 v. Diamond Farming Co.)	MUTUAL WATER CO., LANDALE
23	Superior Court of California, County of Kern,)	MUTUAL WATER CO., SHADOW
24	Case No. S-1500-CV-254-348)	ACRES MUTUAL WATER CO.,
25)	SUNNYSIDE FARMS MUTUAL WATER
26	Wm. Bolthouse Farms, Inc. v. City of)	CO., WESTSIDE PARK MUTUAL
	Lancaster)	WATER CO., AND WHITE FENCE
27	Diamond Farming Co. v. City of Lancaster)	FARMS MUTUAL WATER CO., INC.,
	Diamond Farming Co. v. Palmdale Water)	[SIX OF THE 16 MUTUAL WATER
	Dist.)	COMPANIES THAT COMPRISE A. V.
	Superior Court of California, County of)	UNITED MUTUAL GROUP]
	Riverside, consolidated actions, Case Nos. RIC)	
	353 840, RIC 344 436, RIC 344 668)	
28	AND RELATED ACTIONS.)	For Court's Use Only:
)	Santa Clara County
)	Case No. 1-05-CV-049053
)	(For E-Posting/E-Service Purposes Only)

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PROPOUNDING PARTY: Antelope Valley-East Kern Water Agency

RESPONDING PARTIES: 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]

SET NO.: ONE

TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

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. [which are six of the 16 mutual water companies that comprise A. V. UNITED MUTUAL GROUP], by and through their attorneys of record, Gresham Savage Nolan & Tilden, PC, by Michael Duane Davis, Marlene L. Allen-Hammarlund, and Derek R. Hoffman submit the following response to Antelope Valley-East Kern Water Agency’s First Set of Special Interrogatories, pursuant to the provisions of *Code of Civil Procedure* section 2030.010, as follows:

It should be noted that these responding parties have not fully completed their investigation of the facts relating to this case, and have not fully completed their discovery in this action and have not completed their preparation for the trial. All of the answers contained herein are based upon such information and documents which are presently available to and specifically known to these responding parties and disclose only those contentions which presently occur to such responding parties. It is anticipated that further discovery, independent investigation, legal research and analysis will supply additional facts, add meaning to the known facts, as well as establish entirely new factual conclusions and legal contentions, all of which may lead to substantial additions to, changes in, and variations from the contentions herein set forth. The following interrogatory responses are given without prejudice to responding parties’ right to 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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WHITE FENCE FARMS 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.

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, the members of this Mutual Water Company, individually, have been assessed and have paid significant special water and other property based taxes and/or special assessments for the construction, operation and maintenance of AVEK’s infrastructure, for AVEK’s State Water Project entitlements, and for AVEK’s administrative and operational costs since AVEK was organized. Additionally, the members of this Mutual Water Company, by and through the Mutual Water Company have paid

1 substantial capacity fees, as well as the assessed costs of receiving treated and delivered State
2 Water Project water in the quantities reported.

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

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

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

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.

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18 **SPECIAL INTERROGATORY NO. 4:**

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

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

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

1 **SPECIAL INTERROGATORY NO. 5:**

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

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

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

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12 **SPECIAL INTERROGATORY NO. 6:**

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

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

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

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23 **SPECIAL INTERROGATORY NO. 7:**

24 Describe in detail all WRITINGS supporting your response to Special Interrogatory No.
25 5 above.

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

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 further objects to this interrogatory on the grounds that
9 this responding party has not yet completed discovery and has not yet completed preparation for
10 trial.

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12 **SPECIAL INTERROGATORY NO. 8:**

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

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

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

22
23 **SPECIAL INTERROGATORY NO. 9:**

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

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

26 This responding party objects to this interrogatory on the grounds that this responding
27 party has not yet completed discovery and has not yet completed preparation for trial. This

1 responding party further objects to this interrogatory on the grounds that it seeks information and
2 documents equally available to and in the possession of the propounding party.

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4 **SPECIAL INTERROGATORY NO. 10:**

5 Describe in detail all WRITINGS supporting YOUR response to Special Interrogatory
6 No. 8 above.

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

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.

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18 **SPECIAL INTERROGATORY NO. 11:**

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

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

23 This responding party objects to this interrogatory on the grounds that this responding
24 party has not yet completed discovery and has not yet completed preparation for trial. This
25 responding party further objects to this interrogatory on the grounds that it seeks information and
26 documents equally available to and in the possession of the propounding party. Without waiving
27 its objections, this responding party responds as follows: Yes.

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SPECIAL INTERROGATORY NO. 12:

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

RESPONSE TO SPECIAL INTERROGATORY NO. 12:

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. This responding party further objects to this interrogatory on the grounds that it seeks information protected by the attorney-client privilege and attorney work product privilege. Without waiving said objections, this responding party engaged in discussions at meetings of the Technical Committee of the Antelope Valley Water Resource Study, in 1992 -1993, with Wally Spinarski, then the General Manager of AVEK, during which conversations this responding party was assured that AVEK would not claim what was described as “in lieu water” that was imported State Water Project water that was being brought into the basin by AVEK for White Fence Farms Mutual Water Company.

SPECIAL INTERROGATORY NO. 13:

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

RESPONSE TO SPECIAL INTERROGATORY NO. 13:

This responding party objects to this interrogatory on the grounds that it is overbroad and the documents requested are equally available to the propounding party, and, to the extent the documents are not available, it would be unduly burdensome and oppressive for this responding party to obtain the documents. This responding party further objects to this interrogatory on the grounds that the documents have already been produced, have been posted to the Court’s 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.
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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 from
25 AVEK, in the amounts reported, based upon the representations by Wally Spinarski that AVEK
26 would not claim rights to the State Water Project water that was being imported into the basin by
27

1 AVEK for White Fence Farms Mutual Water Company; and produced the return flows from said
2 State Water Project water.

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4 **SPECIAL INTERROGATORY NO. 16:**

5 Describe in detail all WRITINGS which support YOUR response to Special Interrogatory
6 No. 14.

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

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

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16 **SPECIAL INTERROGATORY NO. 17:**

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

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

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

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1 **SPECIAL INTERROGATORY NO. 18:**

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

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

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

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16 **SPECIAL INTERROGATORY NO. 19:**

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

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

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

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4 **SPECIAL INTERROGATORY NO. 20:**

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

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

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

18
19 **SPECIAL INTERROGATORY NO. 21:**

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

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

24 This responding party objects to this interrogatory on the grounds that it has not yet
25 completed its discovery and investigation of the facts in this matter; on the grounds that it seeks
26 information protected by the attorney-client privilege, the attorney work product doctrine, and
27 the right of privacy; and is overly broad, unduly burdensome and oppressive in that the

1 information, persons and documents that are responsive to this interrogatory are numerous and
2 are equally within the knowledge and availability of the propounding party. Without waiving
3 this objection, this responding party will produce the documents it has located that are in its
4 possession that are responsive to this interrogatory. The individuals with the most knowledge
5 regarding this information have been disclosed in the witness designations.

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7 **SPECIAL INTERROGATORY NO. 22:**

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

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

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

21

22 **SPECIAL INTERROGATORY NO. 23:**

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

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

26 This responding party objects to this interrogatory in that it calls for a legal conclusion,
27 expert opinion, and/or information that is protected by the attorney work product doctrine and

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

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7 **SPECIAL INTERROGATORY NO. 24:**

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

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

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

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16 **SPECIAL INTERROGATORY NO. 25:**

17 Describe in detail all WRITINGS which support your response to Special Interrogatory
18 No. 23.

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

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

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1 Verification by Authorized Individual:

2 Declaration under Penalty of Perjury:

3 I, John Ukkestad, am the General Manager of the White Fence Farms Water Company
4 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 day of November, 2013 at Lancaster, CA.

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11 JOHN UKKESTAD

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28 GRESHAM | SAVAGE
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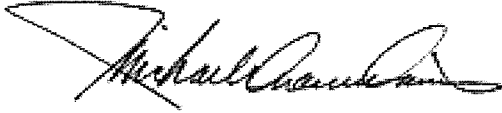
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SIGNED BY ATTORNEY AS TO OBJECTIONS ONLY.

DATED: December 5, 2013

Respectfully submitted,

GRESHAM SAVAGE NOYAN & TIDEN, PC



By: _____

MICHAEL DUANE DAVIS, ESQ.
MARLENE L. ALLEN-HAMMARLUND, ESQ.
DEREK R. HOFFMAN, EQ.
Attorneys for CROSS-DEFENDANT / CROSS-
COMPLAINANT, A. V. UNITED MUTUAL GROUP
and Cross-Defendants, ADAMS BENNETT
INVESTMENTS, LLC; MIRACLE IMPROVEMENT
CORPORATION dba GOLDEN SANDS MOBILE
HOME PARK, aka GOLDEN SANDS TRAILER
PARK, named as ROE 1121; ST. ANDREW'S
ABBEY, INC., named as ROE 623; SERVICE ROCK
PRODUCTS, L.P.; and SHEEP CREEK WATER
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.scefilng.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