



Exhibit B

Exhibit B

001480

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LOS ANGELES COUNTY WATERWORKS
6 DISTRICT NO. 40

**EXEMPT FROM FILING FEES
UNDER GOVERNMENT CODE
SECTION 6103**

7 **OFFICE OF COUNTY COUNSEL**
COUNTY OF LOS ANGELES
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COUNTY WATERWORKS DISTRICT NO. 40

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14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
15 **COUNTY OF LOS ANGELES – CENTRAL DISTRICT**
16

17 **ANTELOPE VALLEY**
18 **GROUNDWATER CASES**
19 Included Actions:
Los Angeles County Waterworks District
20 No. 40 v. Diamond Farming Co., Superior
Court of California, County of Los Angeles,
21 Case No. BC 325201;
22 Los Angeles County Waterworks District
No. 40 v. Diamond Farming Co., Superior
23 Court of California, County of Kern, Case
No. S-1500-CV-254-348;
24 Wm. Bolthouse Farms, Inc. v. City of
25 Lancaster, Diamond Farming Co. v. City of
Lancaster, Diamond Farming Co. v.
26 Palmdale Water Dist., Superior Court of
California, County of Riverside, Case Nos.
27 RIC 353 840, RIC 344 436, RIC 344 668

Judicial Council Coordination No. 4408

CLASS ACTION

Santa Clara Case No. 1-05-CV-049053
Assigned to The Honorable Jack Komar

**OBJECTIONS TO DECLARATIONS AND
STIPULATIONS IN PHASE IV**

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Kathleen M. Munz

- Entire Ex Parte Application of Stipulation for Approval of Stipulation. No stipulation or declaration was submitted; insufficient information provided regarding ownership, parcels, water use, and calculation of applied water use; see objections to Declaration of Terry Munz.

Don Bartz

- Entire declaration, except Paragraph 10. The information supplied does not support claimed water use; the information is unclear or insufficient regarding pump tests, water use, and calculation of applied water use.

Phelan Pinon Hills Community Services District

- Entire stipulation, except Paragraphs 5 and 6. The information supplied does not support claimed water use; the information is unclear or insufficient regarding pump tests, water use, and calculation of applied water use.

Antelope Valley East-Kern Water Agency (Declarations of Thomas Barnes, Dan Flory,

Michael Flood, Dr. Hong-lie Qiu, and Dwayne Chisam)

- Public Water Suppliers generally object to these declarations in their entirety.

City of Los Angeles/LAWA (Declarations of Vivian Howell and Robert Wagner)

- Public Water Suppliers generally object to these declarations in their entirety.

County Sanitation Districts of Los Angeles County Nos. 14 & 20 (Declaration of Raymond Tremblay)

- Public Water Suppliers generally object to declaration of Raymond Tremblay in its entirety.

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Don Bartz’s Supplemental Declaration

- The entire supplemental declaration. The supplemental declaration was untimely, and was not served until April 23, 2013. The information supplied does not support claimed water use; the information is unclear or insufficient regarding pump tests, water use, and calculation of applied water use.

John Calandri Declaration re Property Owned by Landinv, Inc.

- Entire declaration. The declaration was untimely, and was not served until April 23, 2013. The information supplied does not support claimed water use; the information is unclear or insufficient regarding ownership, acreage, leases, groundwater rights to leased parcels, crop type, irrigated acreage, crop duty, water use and calculation of applied water use.

Addendum Exhibits E-1 Through E-4 to Declaration of Anthony L Leggio

- The entire addendum. The addendum was untimely, and was not served until May 1, 2013. The information supplied does not support claimed water use; the information is unclear or insufficient regarding pump records, pump tests, crop type, irrigated acreage, crop duty, water use and calculation of applied water use.

Stipulation Between Tejon Ranchcorp. Tejon Ranch Company. Granite Construction, Diamond Farming Company, Crystal Organic Farms, Grimmway Enterprises, Inc., and Lapis Land Company LLC

- The entire stipulation. The stipulation was untimely, and was not served until May 1, 2013. The information supplied does not support claimed water use. The information is unclear or insufficient regarding ownership, parcel size, leases, irrigated acreage, water use, and calculation of applied water use.

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1 Notwithstanding the objections stated above, the Public Water Suppliers will continue to
2 work with the parties to enter into stipulations before trial.

3
4 Dated: May 3, 2013

BEST BEST & KRIEGER LLP

5
6 By Jeffrey V. Dunn/w.w.
7 ERIC L. GARNER
8 JEFFREY V. DUNN
9 STEFANIE D. HEDLUND
10 Attorneys for Cross-Complainant
11 LOS ANGELES COUNTY
12 WATERWORKS DISTRICT NO. 40

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23 Dated: May 3, 2013

24
25 By _____
26 JAMES L. MARKMAN
27 STEVEN ORR
28 Attorneys for Cross-Defendant
CITY OF PALMDALE

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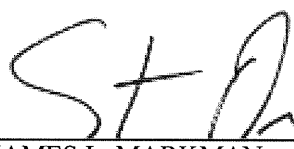
Dated: May 3, 2013

BEST BEST & KRIEGER LLP

By _____
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JEFFREY V. DUNN
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LOS ANGELES COUNTY
WATERWORKS DISTRICT NO. 40

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Dated: May 3, 2013

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JAMES L. MARKMAN
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CITY OF PALMDALE

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Dated: May 3, 2013

By Douglas Evertz (E.J.)
DOUGLAS J. EVERTZ
Attorneys for Cross-Defendant
CITY OF LANCASTER AND
ROSAMOND COMMUNITY SERVICES
DISTRICT

Dated: May 3, 2013

By _____
WAYNE LEMIEUX
KEITH LEMIEUX
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DISTRICT AND PALM RANCH
IRRIGATION DISTRICT

Dated: May 3, 2013

By _____
THOMAS BUNN III
Attorneys for Cross-Defendant
PALMDALE WATER DISTRICT

Dated: May 3, 2013

By _____
BRADLEY T. WEEKS
Attorneys for Cross-Defendant
QUARTZ HILL WATER DISTRICT

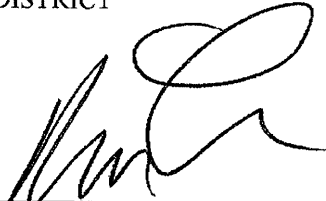
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Dated: May 3, 2013

By _____
DOUGLAS J. EVERTZ
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CITY OF LANCASTER AND
ROSAMOND COMMUNITY SERVICES
DISTRICT

Dated: May 3, 2013

By  _____
WAYNE LEMIEUX
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IRRIGATION DISTRICT

Dated: May 3, 2013

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IRRIGATION DISTRICT

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DISTRICT AND PALM RANCH
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Dated: May 3, 2013

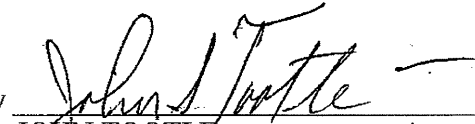
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Dated: May 3, 2013

By 
JOHN TOOTLE
Attorneys for Cross-Defendant
CALIFORNIA WATER SERVICE
COMPANY

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