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EXEMPT FROM FILING FEES
[Gov. Code, § 6103]

8 ADDITIONAL PARTIES LISTED ON PAGE 2 HEREOF
9

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA

11 COUNTY OF LOS ANGELES

12
13 **Coordination Proceeding
Special Title (Rule 3.550(c))**

14 **ANTELOPE VALLEY GROUNDWATER
15 CASES**

16 **Included Actions:**

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

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

21 **Wm. Bolthouse Farms, Inc. v. City of
22 Lancaster, Diamond Farming Co. v. City of
Lancaster, Diamond Farming Co. v.
23 Palmdale Water Dist. Superior Court of
California, County of Riverside,
24 consolidated Actions, Case Nos. RIC 353
840, RIC 344 436, RIC 344 668**
25 -----

26 **AND RELATED ACTIONS.**
27
28

Judicial Council Coordination
Proceeding No. 4408

Santa Clara Case No. 1-05-CV-049053

**JOINT OBJECTIONS TO BLUM TRUST
EVIDENCE BY STATE OF CALIFORNIA,
CITY OF LOS ANGELES, COUNTY
SANITATION DISTRICTS OF LOS
ANGELES COUNTY NOS. 14 & 20, AND
ANTELOPE VALLEY-EAST KERN
WATER AGENCY**

[Assigned for All Purposes to the Honorable
Jack Komar]

Hearing: December 22, 2014

Time: 9:00 a.m.

Place: Los Angeles County Superior Court
Department:

Action Filed: October 26, 2005

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AGENCY

1 **INTRODUCTION**

2 Cross-Defendants, State of California, State of California 50th District Agricultural
3 Association (collectively, State of California), the City of Los Angeles, by and through its
4 Department of Airports, Los Angeles World Airports (LAWA) and the County Sanitation
5 Districts of Los Angeles County Nos. 14 and 20 (LA County Sanitation), and Cross-Complainant
6 Antelope Valley-East Kern Water Agency (AVEK) (collectively, Public Overliers) submit the
7 following Objections to Blum Trust’s Evidence in Support of Its Motion for Summary Judgment.

8 **I. OBJECTIONS TO WELL INDEX LOG FACSIMILE EXHIBIT B TO REQUEST**
9 **FOR JUDICIAL NOTICE**

10 **Grounds for Objection No. 1:**

11 Not authenticated, lacks foundation, lacks personal knowledge, hearsay (Evid. Code sections 403,
12 702, 803, 1200). Mr. Blum and Blum Trust have not demonstrated personal knowledge
13 concerning the well logs and whether these are in fact official government records. They have
14 not authenticated these documents or provided foundation for where these documents came from
15 and why. The contents of the well logs are hearsay, subject to no exception.

16 **II. OBJECTIONS TO DECLARATION OF ANTHONY L. LEGGIO EXHIBIT C TO**
17 **REQUEST FOR JUDICIAL NOTICE**

18 **Grounds for Objection No. 1:**

19 Not relevant, lacks foundation, lacks personal knowledge, hearsay (Evid. Code sections 350, 403,
20 702, 803, 1200). The alleged water use on Blum Trust’s land is not a complete affirmative
21 defense to any cause of action, nor is it related to a complete affirmative defense. Self help was
22 not raised by Blum Trust as a complete defense to prescription and it cannot possibly defeat any
23 other cause of action. Mr. Leggio has not made any declaration on behalf of Wm. Bolthouse
24 Farms, Inc. that it used any particular crop on Blum Trust’s land, the crop duty for that crop, his
25 personal knowledge of that crop duty, or his expertise, and where and when the water was used.
26 He declared on behalf of Bolthouse Properties LLC, an entity that did no farming on Blum Trust
27 land. Further, since it is an incomplete document, filed in a separate action, it is hearsay subject
28 to no exception.

1 **III. OBJECTIONS TO ADDENDUM TO DECLARATION OF ANTHONY L. LEGGIO**
2 **EXHIBIT D TO REQUEST FOR JUDICIAL NOTICE**

3 **Grounds for Objection No. 1:**

4 Not relevant, lacks foundation, lacks personal knowledge, hearsay (Evid. Code sections 350, 403,
5 702, 803, 1200). The alleged water use on Blum Trust's land is not a complete affirmative
6 defense to any cause of action, nor is it related to a complete affirmative defense. Self help was
7 not raised by Blum Trust as a complete defense to prescription and it cannot possibly defeat any
8 other cause of action. Mr. Leggio has not made any declaration on behalf of Wm. Bolthouse
9 Farms, Inc. that it used any particular crop on Blum Trust's land, the crop duty for that crop, his
10 personal knowledge of that crop duty, his expertise, and where and when the water was used. He
11 declared on behalf of Bolthouse Properties LLC, an entity that did no farming on Blum Trust
12 land. Further, since it is an incomplete document, filed in a separate action, it is hearsay subject
13 to no exception.

14 **IV. OBJECTIONS TO ADDENDUM TO STIPULATION BETWEEN PUBLIC WATER**
15 **SUPPLIERS AND BLUM TRUST EXHIBIT H TO REQUEST FOR JUDICIAL NOTICE**

16 **Grounds for Objection No. 1:**

17 Not relevant (Evid. Code section 350). The Stipulation itself acknowledges it is not for the
18 purposes of establishing a water right. The Public Overliers have not stipulated with Blum Trust
19 regarding its water use. Water use in 2011-2012 is not relevant to any complete affirmative
20 defense in this matter. The alleged water use on Blum Trust's land is not a complete affirmative
21 defense to any cause of action, nor is it related to a complete affirmative defense. Self-help was
22 not raised by Blum Trust as a complete defense to prescription and it cannot possibly defeat any
23 other cause of action.

24 **IV. OBJECTIONS TO DECLARATION OF TRACY M. SAIKI EXHIBIT I TO**
25 **REQUEST FOR JUDICIAL NOTICE**

26 **Grounds for Objection No. 1:**

27 Not relevant (Evid. Code section 350). Whether or not Wm. Bolthouse Farms, Inc. is
28 claiming any rights to groundwater is not relevant to any alleged affirmative defense in this

1 matter. Ms. Saiki also states that Wm. Bolthouse Farms, Inc. does not lease any property other
2 than property owned by Bolthouse Properties LLC.

3 **V. OBJECTIONS TO PUBLIC WATER SUPPLIERS' CASE MANAGEMENT**
4 **STATEMENT EXHIBIT J TO REQUEST FOR JUDICIAL NOTICE**

5 **Grounds for Objection No. 1:**

6 Not relevant (Evid. Code section 350). The Public Water Suppliers' blanket statement, without
7 legal authority is not relevant to any affirmative defense in this matter.

8 **VI. OBJECTIONS TO CITY OF LOS ANGELES' PROPOSAL REGARDING**
9 **DISCOVERY EXHIBIT K TO REQUEST FOR JUDICIAL NOTICE**

10 **Grounds for Objection No. 1:**

11 Not relevant (Evid. Code section 350).

12 **VII. OBJECTIONS TO RICHARD WOOD'S SUPPLEMENTAL CASE MANAGEMENT**
13 **STATEMENT EXHIBIT L TO REQUEST FOR JUDICIAL NOTICE**

14 **Grounds for Objection No. 1:**

15 Not relevant (Evid. Code section 350).

16 **VIII. OBJECTIONS TO EXCERPT OF CONFIDENTIAL SETTLEMENT DOCUMENT**
17 **EXHIBIT M TO REQUEST FOR JUDICIAL NOTICE**

18 **Grounds for Objection No. 1:**

19 Not relevant, lacks foundation, lacks personal knowledge, hearsay, confidential settlement
20 discussions (Evid. Code sections 350, 403, 702, 803, 1152, 1200). Incomplete hearsay not
21 "capable of immediate and accurate determination by resort to sources of reasonably indisputable
22 accuracy." Furthermore, the substance of the exhibit is inadmissible for a multitude of reasons: It
23 is irrelevant to the determination of any fact or issue related to Blum Trust's motion; there is a
24 lack of any foundation for the exhibit; it constitutes hearsay to the extent it is even intelligible;
25 and, finally, evidence of settlement discussions are inadmissible. Handing settlement documents
26 to the Court and offering them for proof in a summary judgment motion is a sanctionable act and
27 undermines a years long settlement process.

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1 **VIII. OBJECTIONS TO DECLARATION OF SHELDON R. BLUM**

2 **Objection No. 1:**

3 Declaration of Sheldon R. Blum (Blum Dec.) par. 3. Not relevant and lacks foundation
4 (Evid. Code sections 350, 403, 702, 803). No foundation for why he thinks the land would have
5 little value without its location with respect to the groundwater basin. The reason Blum Trust
6 bought the land is irrelevant to any affirmative defense or part thereof.

7 **Objection No. 2:**

8 Blum Dec. par. 4. Not relevant, lacks foundation, lacks personal knowledge, hearsay (Evid.
9 Code sections 350, 403, 702, 803, 1200). There is no foundation to the statement that it paid its
10 property taxes. In fact, the lease agreement between WM. Bolthouse Farms, Inc. and Blum Trust
11 states that WM. Bolthouse Farms, Inc. will pay the property taxes. To the extent Mr. Blum is
12 relying on an out of court statement of a non-declarant it is hearsay not subject to any exception.

13 **Objection No. 3:**

14 Blum Dec. par. 5. Not relevant, lacks foundation, lacks personal knowledge, hearsay (Evid.
15 Code sections 350, 403, 702, 803, 1200). Exhibit B to the Exhibit list is an exhibit made out of
16 Court that lacks foundation and lacks authentication and is hearsay not subject to any exception.
17 No foundation that these are the same wells there today and not relevant because Blum Trust and
18 WM. Bolthouse Farms, Inc. did not pump from those wells.

19 **Objection No. 4:**

20 Blum Dec. par. 6. Not relevant, lacks foundation, lacks personal knowledge, hearsay (Evid.
21 Code sections 350, 403, 702, 803, 1200) See above regarding Exhibit B to Request for Judicial
22 Notice. No foundation that these are the same wells on the property today and not relevant
23 because Blum Trust and WM. Bolthouse Farms, Inc. did not pump from those wells.

24 **Objection No. 5:**

25 Blum Dec. par. 7. Not relevant, conclusory, lacks foundation, lacks personal knowledge,
26 hearsay, inadmissible opinion testimony (Evid. Code sections 350, 403, 702, 800, 803, 1200).

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1 **Objection No. 6:**

2 Blum Dec. par. 8. Not relevant, conclusory, lacks foundation, lacks personal knowledge,
3 hearsay, inadmissible opinion testimony (Evid. Code sections 350, 403, 702, 800, 803, 1200).
4 Exhibit 1 to the Exhibit List is a partial out of court document that is hearsay and lacks foundation
5 and not authenticated. The comments in the paragraph lack foundation and are inadmissible legal
6 conclusions of a lay witness.

7 **Objection No. 7:**

8 Blum Dec. par. 9. Not relevant, conclusory, lacks foundation, lacks personal knowledge,
9 hearsay, inadmissible opinion testimony (Evid. Code sections 350, 403, 702, 800, 803, 1200).
10 See above Objection No. 6. Further, the alleged facts that the covenants run with the land and
11 that the Lease cited the groundwater adjudication are not relevant and prove nothing related to
12 any affirmative defense in this matter.

13 **Objection No. 8:**

14 Blum Dec. par. 11. Not relevant, conclusory, lacks foundation, lacks personal knowledge,
15 hearsay, inadmissible opinion testimony (Evid. Code sections 350, 403, 702, 800, 803, 1200).
16 Exhibit 3 to the Exhibit list is inadmissible hearsay not subject to any exception. Further the
17 alleged statement in the email is not relevant to any affirmative defense in this matter.

18 **Objection No. 9:**

19 Blum Dec. par. 12. Not relevant, conclusory, lacks foundation, lacks personal knowledge,
20 hearsay, inadmissible opinion testimony (Evid. Code sections 350, 403, 702, 800, 803, 1200).
21 Exhibit 4 to the Exhibit list is inadmissible hearsay not subject to any exception. Further the
22 alleged statement in the email is not relevant to any affirmative defense in this matter.

23 **Objection No. 9:**

24 Blum Dec. par. 14. Not relevant, lacks foundation, lacks personal knowledge, hearsay,
25 (Evid. Code sections 350, 403, 702, 803, 1200). Same objections as to Exhibit 6 to the Exhibit
26 list.

1 **Objection No. 10:**

2 Blum Dec. par. 15. Not relevant, lacks foundation, lacks personal knowledge, hearsay,
3 (Evid. Code sections 350, 403, 702, 803, 1200).

4 **Objection No. 11:**

5 Blum Dec. par. 18. Not relevant, conclusory, lacks foundation, lacks personal knowledge,
6 hearsay, inadmissible opinion testimony (Evid. Code sections 350, 403, 702, 800, 803, 1200).
7 The comments in the paragraph lack foundation and are inadmissible legal conclusions of a lay
8 witness. Further, they are not relevant to any affirmative defense in this matter and lack personal
9 knowledge of the declarant.

10 **Objection No. 12:**

11 Blum Dec. par. 19. Not relevant, conclusory, lacks foundation, lacks personal knowledge,
12 hearsay, inadmissible opinion testimony (Evid. Code sections 350, 403, 702, 800, 803, 1200).
13 See above regarding Exhibits C and D to the Request for Judicial Notice. Mr. Blum has no
14 personal knowledge of any of the facts contained in those alleged business records and all
15 information contained in those declarations and business records are hearsay and subject to no
16 exception. The statements in the paragraph lack foundation regarding how the information
17 proves anything and contains the inadmissible opinions of a lay witness.

18 **Objection No. 13:**

19 Blum Dec. par. 20. Not relevant, conclusory, lacks foundation, lacks personal knowledge,
20 hearsay, inadmissible opinion testimony (Evid. Code sections 350, 403, 702, 800, 803, 1200).
21 Mr. Blum has no personal knowledge regarding Mr. Scalmanini's report and conclusions and any
22 opinion regarding Place of Use and when that type of analysis is used is an inadmissible lay
23 opinion and a legal conclusion. Further, Mr. Scalamnini's report is not authenticated and only
24 one piece of the entire report is used. Mr. Scalamnini's report is also hearsay that cannot be
25 relied upon by a lay witness. Finally, Mr. Blum lays no foundation for use of the report, what the
26 report is, what its conclusions are and that onions were in fact planted on his land and when.

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1 **Objection No. 14:**

2 Blum Dec. par. 21. Not relevant, conclusory, lacks foundation, lacks personal knowledge,
3 hearsay, inadmissible opinion testimony (Evid. Code sections 350, 403, 702, 800, 803, 1200).
4 Mr. Blum’s statements regarding what Mr. Shahroody or Mr. Scalmini may have said in their
5 declarations or reports are inadmissible hearsay statements subject to no exceptions. Further, Mr.
6 Blum lacks any personal knowledge regarding the applied water duties for onions. Mr. Blum’s
7 opinion regarding applied water duties is an inadmissible lay opinion and a legal conclusion. Mr.
8 Blum lays no foundation for use of the report or declaration, what the report is, what its
9 conclusions are and that onions were in fact planted on his land and when. The conclusory
10 statements are also not relevant, as they do not support any affirmative defense to the Public
11 Water Suppliers’ Complaint.

12 **Objection No. 15:**

13 Blum Dec. par. 25. Not relevant, conclusory, lacks foundation, lacks personal knowledge,
14 hearsay (Evid. Code sections 350, 403, 702, 803, 1200). Statements made in a discovery
15 response in another case are hearsay subject to no exception. The document is not provided in its
16 entirety and is not authenticated. Mr. Leggio does not profess to personal knowledge regarding
17 WM. Bolthouse Farms, Inc.’s actions. Mr. Blum’s statements lack foundation and are not
18 relevant to any affirmative defense to any causes of action in the Public Water Suppliers’
19 Complaint.

20 **Objection No. 16:**

21 Blum Dec. par. 26. Not relevant, conclusory, lacks foundation, lacks personal knowledge,
22 hearsay (Evid. Code sections 350, 403, 702, 803, 1200). Statements made in a settlement
23 document in another case are hearsay subject to no exception. Exhibit 10 is also not provided in
24 its entirety and is therefore not authenticated. Finally, the alleged fact that the settlement
25 agreement between those two parties contained a reservation of rights is not relevant to any
26 affirmative defense in this matter.

27 **Objection No. 17:**

28 Blum Dec. par. 27. See objections to Exhibit I of the Request for Judicial Notice above.

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Objection No. 18:

Blum Dec. par. 28. Not relevant, conclusory, lacks foundation, lacks personal knowledge, hearsay, inadmissible opinion testimony (Evid. Code sections 350, 403, 702, 800, 803, 1200). Mr. Blum’s statements are inadmissible lay opinions and legal conclusions. See objections nos. 6, 7, 1 and 17 above.

Objection No. 19:

Blum Dec. par. 29. Not relevant, conclusory, lacks foundation, lacks personal knowledge, hearsay, inadmissible opinion testimony, confidential settlement communications (Evid. Code sections 350, 403, 702, 800, 803, 1152, 1200). Whether or not Blum Trust’s production rights are in conflict with Bolthouse Properties LLC is not relevant to any affirmative defense in this matter. The statements made in this paragraph are also inadmissible opinions of a lay witness and legal conclusions. Mr. Blum’s statements regarding confidential settlement discussions are inappropriate and inadmissible and not within his personal knowledge. They are also hearsay not subject to any exception and no foundation is laid for their admissibility.

Objection No. 20:

Blum Dec. par. 30. See objection to Exhibit H to Request for Judicial Notice above.

Objection No. 21:

Blum Dec. par. 31. Not relevant, conclusory, lacks foundation, lacks personal knowledge, hearsay, inadmissible opinion testimony (Evid. Code sections 350, 403, 702, 800, 803, 1200).

Objection No. 22:

Blum Dec. par. 32. Not relevant, lacks foundation, hearsay (Evid. Code sections 350, 403, 702, 803).

Objection No. 23:

Blum Dec. par. 33. Not relevant, lacks foundation, hearsay (Evid. Code sections 350, 403, 702, 803).

1 **Objection No. 24:**

2 Blum Dec. par. 34. Not relevant, lacks foundation, hearsay (Evid. Code sections 350, 403,
3 702, 803).

4 **Objection No. 25:**

5 Blum Dec. par. 35. Not relevant, lacks foundation, hearsay (Evid. Code sections 350, 403,
6 702, 803).

7 **Objection No. 26:**

8 Blum Dec. par. 36. Not relevant, lacks foundation, hearsay (Evid. Code sections 350, 403,
9 702, 803).

10 **Objection No. 27:**

11 Blum Dec. par. 37. Not relevant, lacks foundation, hearsay (Evid. Code sections 350, 403,
12 702, 803).

13 **IX. OBJECTIONS TO DECLARATION OF ALI SHAHROODY**

14 **Objection No. 1:**

15 Declaration of Ali Shahroody (Shahroody Dec.) par. 4. Not relevant, lacks foundation,
16 hearsay, authenticity (Evid. Code sections 350, 403, 702, 803). See objections to Exhibit B to
17 Request for Judicial Notice above. Mr. Shahroody lays no foundation for the alleged fact that
18 these wells still existed at the time Blum Trust bought the property. Further, since Bolthouse
19 Farms, Inc. did not pump from these wells, this information is not relevant. The statements are
20 also not relevant since they speak to no affirmative defense to an entire cause of action in this
21 matter.

22 **Objection No. 2:**

23 Shahroody Dec. par. 5. Not relevant, lacks foundation, hearsay, authenticity (Evid. Code
24 sections 350, 403, 702, 803). See objections to Exhibit 1 to the Exhibit list above. The
25 statements are not relevant since they speak to no affirmative defense to an entire cause of action
26 in this matter. The statements are hearsay subject to no exception, since Mr. Shahroody's
27 expertise is not interpretations of lease agreements and the lease agreement is not authenticated.
28 Finally, no foundation is laid for how he came to those conclusions.

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Objection No. 3:

Shahroody Dec. par. 6. See objections to Exhibits C and D in the Request for Judicial Notice above.

Objection No. 4:

Shahroody Dec. par. 7. Lacks foundation, not relevant (Evid. Code sections 350, 403, 702, 803). Mr. Shahroody does not lay a foundation for his expert opinion regarding the water use.

Objection No. 5:

Shahroody Dec. par. 8. Lacks foundation, not relevant, legal conclusion (Evid. Code sections 350, 403, 702, 803). The amount of water WM. Bolthouse Farms used on Blum Trust land is irrelevant to any affirmative defense raised to any cause of action in the Public Water Suppliers' Complaint. Mr. Shahroody's statement on Blum Trust's entitlements are legal conclusions and improper for an expert witness.

Objection No. 6:

Shahroody Dec. par. 9. Lacks foundation, not relevant, legal conclusion (Evid. Code sections 350, 403, 702, 803).

Objection No. 7:


Shahroody Dec. par. 10. Lacks foundation, not relevant, legal conclusion (Evid. Code sections 350, 403, 702, 803).

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Dated: December 8, 2014

OFFICE OF THE ATTORNEY GENERAL
STATE OF CALIFORNIA

By: 
NOAH GOLDEN-KRASNER
Attorneys for the State of California,
Santa Monica Mountains Conservancy,
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Agricultural Association

Dated: December __, 2014

ELLISON, SCHNEIDER & HARRIS L.L.P.

By: _____
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Districts of Los Angeles County Nos. 14
and 20

Dated: December __, 2014

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By: _____
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Angeles World Airports

Dated: December __, 2014

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EAST KERN WATER AGENCY

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Dated: December __, 2014

OFFICE OF THE ATTORNEY GENERAL
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Dated: December 8, 2014

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Angeles World Airports

Dated: December __, 2014

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EAST KERN WATER AGENCY

1 Dated: December __, 2014

OFFICE OF THE ATTORNEY GENERAL
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By: _____
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By: _____
CHRISTOPHER M. SANDERS
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Districts of Los Angeles County Nos. 14
and 20

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14 Dated: December 8, 2014

Kronick, Moskovitz, Tiedemann & Girard
By: Janet K. Goldsmith
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19 Dated: December __, 2014

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EAST KERN WATER AGENCY

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and 20

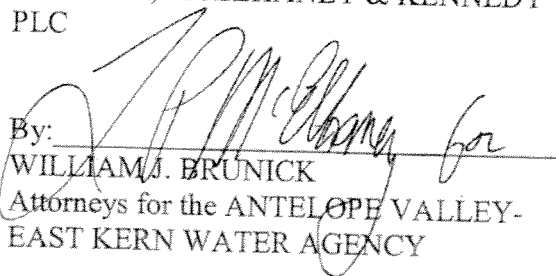
Dated: December __, 2014

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Angeles World Airports

Dated: December 8, 2014

BRUNICK, MCELHANEY & KENNEDY
PLC

By:  _____
WILLIAM J. BRUNICK
Attorneys for the ANTELOPE VALLEY-
EAST KERN WATER AGENCY

CERTIFICATE OF SERVICE

Case Name: Antelope Valley Groundwater No. JCCP 4408
Cases

I hereby certify that on December 8, 2014, I electronically filed the following document(s) with the Clerk of the Court by using the CM/ECF system:

**JOINT OBJECTIONS TO BLUM TRUST EVIDENCE BY STATE OF CALIFORNIA,
CITY OF LOS ANGELES, COUNTY SANITATION DISTRICTS OF LOS ANGELES
COUNTY NOS. 14 & 20, AND ANTELOPE VALLEY-EAST KERN WATER AGENCY**

on the interested parties in this action, by posting the document(s) listed above to the Santa Clara County Superior Court e-filing website (<http://www.scefiling.org>) under the Antelope Valley Groundwater matter pursuant to the Court's Order dated October 27, 2005.

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on December 8, 2014, at Los Angeles, California.

Gwen Blanchard

Declarant



Signature