

1 Kurt A. Stiefler, SBN 103249  
4422 Mammoth Av.  
2 Sherman Oaks CA 91423  
(818) 616-1050

3 Counsel for Reesedale Mutual Water Company  
4  
5  
6  
7

8 SUPERIOR COURT OF CALIFORNIA  
9 COUNTY OF LOS ANGELES

|  |   |  |
|--|---|--|
| 10 ANTELOPE VALLEY                         | ) | Judicial Council Coordination No. 4408 |
| 11 GROUNDWATER CASES                       | ) |  |
| 12 Included actions:                       | ) | For Filing Purposes Only:              |
| 13 Los Angeles County Waterworks District  | ) | Santa Clara County Case No.: 1-05-CV-  |
| No.40 v. Diamond Farming Co.               | ) | 049053                                 |
| 14 Los Angeles County Superior Court       | ) | Assigned to: Honorable Jack Komar      |
| Case No. BC 325201                         | ) |  |
| 15 Los Angeles County Waterworks District  | ) | RESEDALE MUTUAL WATER                  |
| 16 No.40 v. Diamond Farming Co.            | ) | COMPANY'S SUBMISSION IN                |
| Kern County Superior Court                 | ) | SUPPORT OF JOINDER OF CLASS            |
| 17 Case No. S-1500-CV-254-348              | ) | SETTLEMENT                             |
| 18 Wm. Bolthouse Farms, Inc. v. City of    | ) |  |
| Lancaster, Diamond Farming Co. v. City     | ) |  |
| 19 of Lancaster, Diamond Farming Co. v.    | ) |  |
| Palmdale Water Dist.                       | ) |  |
| 20 Riverside County Superior Court         | ) |  |
| Consolidated actions                       | ) |  |
| 21 Case Nos. RIC 353 840, RIC 344 436, RIC | ) |  |
| 344 668                                    | ) |  |
| 22   | ) |  |

23  
24 Reesedale Mutual Water Company submits the following documents in support of  
25 its joinder in the Proposed Judgment and Physical Solution:


- 26 1. Declaration of Dani John
- 27 2. Declaration of Kristi Vivian

28

- 1 3. Declaration of Leesa Mansperger
- 2 4. Declaration of Christine McLernon
- 3 5. Declaration of Tommy Thompson
- 4 6. Declaration of Donna Hopkins
- 5 7. Declaration of Christine Medlin
- 6 8. Declaration of Rulon Parker
- 7 9. Declaration of Ernest Coleal
- 8 10. Declaration of Patricia Ellis
- 9 11. Declaration of Ulysses Contreareas
- 10 12. Declaration of Henry Giguere
- 11 13. Declaration of Bonnie Alsup
- 12 14. Declaration of James Johnson
- 13 15. Declaration of Justin Anderson
- 14 16. Declaration of Henry Balderas
- 15 17. Declaration of Christine Pendley
- 16 18. Supplemental Declaration of Patricia Parker

17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Dated; June 30, 2015

  
By: Kurt Stiefler, counsel for Reesedale  
Mutual Water Company

John Declaration

Dani or DECLARATION CONCERNING WATER USE

I, Stephan John, declare:

I have personal knowledge of the facts set forth in this declaration and I could and would competently testify thereto under oath if called upon to do so. I am providing the following information in response to the Jeffrey Dunn's letter dated May 7, 2015 concerning the Antelope Valley Water Cases. The numbered responses below correspond to the questions set forth in that letter.

1. I am the occupant of the residential property located at:

Address: 44315 N 88th St. E

APN: 3376-28-19

2. I own/lease that property and have since 4-13-2001

3. No well has existed on this parcel during any of the Time Periods. All of the water used by this parcel is provided through a metered connection from a well owned by the Reesedale Mutual Water District.

4. No

5. None

6. Not applicable

7. Residential use only.

8. None

9. All water is provided to this parcel by the Reesedale Mutual Water Company.

a.

10. See response to numbers 1 and 2.

11. Not applicable

12. Reesedale has the records concerning water usage.

13. I lack personal information to be able to respond further to this question. Please see the declaration submitted on behalf of Reesedale Water District.

I declare the foregoing to be true and correct under penalty of perjury under the laws of the State of California

Dated: 5/9/15

By: Daniel John



**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

Indian Wells  
(760) 568-2611  
Los Angeles  
(213) 617-8100  
Ontario  
(909) 989-8584  
Riverside  
(951) 686-1450

18101 Von Karman Avenue, Suite 1000, Irvine, CA 92612  
Phone: (949) 263-2600 | Fax: (949) 260-0972 | www.bbklaw.com

Sacramento  
(916) 325-4000  
San Diego  
(619) 525-1300  
Walnut Creek  
(925) 977-3300  
Washington, DC  
(202) 785-0600

**Jeffrey V. Dunn**  
(949) 263-2616  
jeffrey.dunn@bbklaw.com  
File No. 26345.00010

May 7, 2015

**VIA POSTING TO THE COURT'S WEBSITE AND E-MAIL**

Rosamond Mobile Home Park  
Robert Coldren (clo@coldrenlawoffices.com)

Milana VII, LLC  
Daniel T. Rudderow (danrudderow@gmail.com)

Eyherabide Land Co.  
Calvin Stead (cstead@bortonpetrini.com)  
Kyle Holmes (kholmes@bortonpetrini.com )

Charles Tapia and Nellie Tapia Family Trust  
Robert H. Brumfield (bob@brumfield-haganlaw.com)  
Heather Ijames (heather@brumfield-haganlaw.com)

Desert Breeze MHP, LLC  
Daniel Epstein (epstein14@yahoo.com)

Reesdale Mutual Water Company  
Kurt Stiefler (stieflerlaw@att.net)

Re: *Antelope Valley Groundwater Adjudication*  
Judicial Counsel Coordination Number 4408

Dear Counsel and Unrepresented Parties:

I write on behalf of the stipulating parties to the Proposed Judgment and Physical Solution in the above captioned case. Based on your court statements and/or communications with various stipulating parties, I understand that you wish to discuss settlement possibilities during the May 11, 2015 meet and confer session.

In anticipation of the settlement discussions, the stipulating parties request that you share the information and documents described below prior to Monday's meeting and bring such information with you on Monday. As background, this request is an abridged version of the Court's Phase 4 Discovery Order<sup>1</sup> and will help the stipulating parties understand your claim and facilitate a meaningful settlement discussion.

Please provide the following information and documents for the calendar years of 2000, 2001, 2002, 2003, 2004, 2011 or 2012 ("Time Periods"):

1. The Assessor Parcel Number, Assessor Tax Number, or Assessor's Identification Number of the parcel owned by you in the Antelope Valley Adjudication Area.

<sup>1</sup> The Phase 4 Discovery Order is available online at [http://www.scefiling.org/filingdocs/194/57805/92065\\_2012x12x11xJKxDiscoveryxOrderxforxPhasex4xTrial.pdf](http://www.scefiling.org/filingdocs/194/57805/92065_2012x12x11xJKxDiscoveryxOrderxforxPhasex4xTrial.pdf).



**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

May 7, 2015  
Page 2

2. The record title owner of the parcel referenced in subparagraph 1 from 2000 to present.
3. Whether a groundwater well existed on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
4. Whether a groundwater well was operated on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
5. The amount of groundwater produced from the parcel referenced in subparagraph 1 in any or all of the Time Periods.
6. The use(s) to which groundwater produced from the parcel was put on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
7. The use(s) to which the parcel referenced in subparagraph 1 was put during each of the calendar years 2011 and 2012.
8. The crop type, if any, grown on the parcel and irrigated acreage of such crop type during each of the calendar years during the Time Periods.
9. If you pump groundwater from another parcel for use on the parcel referenced in subparagraph 1 in any or all of the Time Periods, please identify the parcel from where water was pumped.
  - a. State the amount of water rights claimed as the reasonable and beneficial use for such parcel
10. For each parcel referenced in subparagraph 1, please indicate whether the parcel was leased during the Time Periods. If it was leased,
  - a. Provide the name of the lessee
  - b. The parcel's identification number
  - c. Whether the lease allocated credits for groundwater produced by lessee
  - d. Amount of groundwater produced by the lessee and delivered to another parcel and such parcel's identification number
  - e. If known, the use(s) to which groundwater was put to the leased parcel for calendar years 2011 and 2012.



**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

May 7, 2015  
Page 3

11. If you claim groundwater rights based upon something other than groundwater production or use, please state the claim for each of the Time Periods, and your legal and factual basis.
12. Documentations supporting your responses to requests 1 to 11, including but not limited to groundwater extraction notices, well logs, well efficiency test records, leases . . . etc.
13. All other information and documentations that substantiates your claim for water rights.

The stipulating parties request that your response be verified (e.g., provided under oath as true and correct).

Please provide the requested information either by posting them at the Court's website or email to me at [jeffrey.dunn@bbklaw.com](mailto:jeffrey.dunn@bbklaw.com) and copying Wendy Wang at [wendy.wang@bbklaw.com](mailto:wendy.wang@bbklaw.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeffrey V. Dunn', written over a horizontal line.

Jeffrey V. Dunn  
of BEST BEST & KRIEGER LLP



Vivian Declaration

DECLARATION CONCERNING WATER USE

I, Kristi Vivian, declare:

I have personal knowledge of the facts set forth in this declaration and I could and would competently testify thereto under oath if called upon to do so. I am providing the following information in response to the Jeffrey Dunn's letter dated May 7, 2015 concerning the Antelope Valley Water Cases. The numbered responses below correspond to the questions set forth in that letter.

1. I am the occupant of the residential property located at:

Address: 8762 E. Ave. J

APN: 3376-27-19

2. I own/~~lease~~ that property and have since

1992

3. No well has existed on this parcel during any of the Time Periods. All of the water used by this parcel is provided through a metered connection from a well owned by the Reesedale Mutual Water District.

4. No

5. None

6. Not applicable

7. Residential use only.

8. None

9. All water is provided to this parcel by the Reesedale Mutual Water Company.

a.

10. See response to numbers 1 and 2.

11. Not applicable

12. Reesedale has the records concerning water usage.

13. I lack personal information to be able to respond further to this question. Please see the declaration submitted on behalf of Reesedale Water District.

I declare the foregoing to be true and correct under penalty of perjury under the laws of the State of California

Dated: 5-9-15

By: Kristi L Oivian  
Kristi L Oivian

Indian Wells  
(760) 568-2611  
Los Angeles  
(213) 617-8100  
Ontario  
(909) 989-8584  
Riverside  
(951) 686-1450



**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

18101 Von Karman Avenue, Suite 1000, Irvine, CA 92612  
Phone: (949) 263-2600 | Fax: (949) 260-0972 | www.bbklaw.com

Sacramento  
(916) 325-4000  
San Diego  
(619) 525-1300  
Walnut Creek  
(925) 977-3300  
Washington, DC  
(202) 785-0600

**Jeffrey V. Dunn**  
(949) 263-2616  
jeffrey.dunn@bbklaw.com  
File No. 26345.00010

May 7, 2015

**VIA POSTING TO THE COURT'S WEBSITE AND E-MAIL**

Rosamond Mobile Home Park  
Robert Coldren (clo@coldrenlawoffices.com)

Milana VII, LLC  
Daniel T. Rudderow (danrudderow@gmail.com)

Eyherabide Land Co.  
Calvin Stead (cstead@bortonpetrini.com)  
Kyle Holmes (kholmes@bortonpetrini.com)

Charles Tapia and Nellie Tapia Family Trust  
Robert H. Brumfield (bob@brumfield-haganlaw.com)  
Heather Ijames (heather@brumfield-haganlaw.com)

Desert Breeze MHP, LLC  
Daniel Epstein (epstein14@yahoo.com)

Reesdale Mutual Water Company  
Kurt Stiefler (stieflerlaw@att.net)

Re: *Antelope Valley Groundwater Adjudication*  
Judicial Counsel Coordination Number 4408

Dear Counsel and Unrepresented Parties:

I write on behalf of the stipulating parties to the Proposed Judgment and Physical Solution in the above captioned case. Based on your court statements and/or communications with various stipulating parties, I understand that you wish to discuss settlement possibilities during the May 11, 2015 meet and confer session.

In anticipation of the settlement discussions, the stipulating parties request that you share the information and documents described below prior to Monday's meeting and bring such information with you on Monday. As background, this request is an abridged version of the Court's Phase 4 Discovery Order<sup>1</sup> and will help the stipulating parties understand your claim and facilitate a meaningful settlement discussion.

Please provide the following information and documents for the calendar years of 2000, 2001, 2002, 2003, 2004, 2011 or 2012 ("Time Periods"):

1. The Assessor Parcel Number, Assessor Tax Number, or Assessor's Identification Number of the parcel owned by you in the Antelope Valley Adjudication Area.

<sup>1</sup> The Phase 4 Discovery Order is available online at [http://www.scefiling.org/filingdocs/194/57805/92065\\_2012x12x11xJKxDiscoveryxOrderxforxPhasex4xTrial.pdf](http://www.scefiling.org/filingdocs/194/57805/92065_2012x12x11xJKxDiscoveryxOrderxforxPhasex4xTrial.pdf).



**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

May 7, 2015  
Page 2

2. The record title owner of the parcel referenced in subparagraph 1 from 2000 to present.
3. Whether a groundwater well existed on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
4. Whether a groundwater well was operated on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
5. The amount of groundwater produced from the parcel referenced in subparagraph 1 in any or all of the Time Periods.
6. The use(s) to which groundwater produced from the parcel was put on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
7. The use(s) to which the parcel referenced in subparagraph 1 was put during each of the calendar years 2011 and 2012.
8. The crop type, if any, grown on the parcel and irrigated acreage of such crop type during each of the calendar years during the Time Periods.
9. If you pump groundwater from another parcel for use on the parcel referenced in subparagraph 1 in any or all of the Time Periods, please identify the parcel from where water was pumped.
  - a. State the amount of water rights claimed as the reasonable and beneficial use for such parcel
10. For each parcel referenced in subparagraph 1, please indicate whether the parcel was leased during the Time Periods. If it was leased,
  - a. Provide the name of the lessee
  - b. The parcel's identification number
  - c. Whether the lease allocated credits for groundwater produced by lessee
  - d. Amount of groundwater produced by the lessee and delivered to another parcel and such parcel's identification number
  - e. If known, the use(s) to which groundwater was put to the leased parcel for calendar years 2011 and 2012.



**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

May 7, 2015  
Page 3

11. If you claim groundwater rights based upon something other than groundwater production or use, please state the claim for each of the Time Periods, and your legal and factual basis.
12. Documentations supporting your responses to requests 1 to 11, including but not limited to groundwater extraction notices, well logs, well efficiency test records, leases . . . etc.
13. All other information and documentations that substantiates your claim for water rights.

The stipulating parties request that your response be verified (e.g., provided under oath as true and correct).

Please provide the requested information either by posting them at the Court's website or email to me at [jeffrey.dunn@bbklaw.com](mailto:jeffrey.dunn@bbklaw.com) and copying Wendy Wang at [wendy.wang@bbklaw.com](mailto:wendy.wang@bbklaw.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeffrey V. Dunn', written over a horizontal line.

Jeffrey V. Dunn  
of BEST BEST & KRIEGER LLP

Mansperger Declaration

DECLARATION CONCERNING WATER USE

I, Leesa Mansperger, declare:

I have personal knowledge of the facts set forth in this declaration and I could and would competently testify thereto under oath if called upon to do so. I am providing the following information in response to the Jeffrey Dunn's letter dated May 7, 2015 concerning the Antelope Valley Water Cases. The numbered responses below correspond to the questions set forth in that letter.

1. I am the occupant of the residential property located at:

Address: 44303 N 87th St E

APN: 3376-27-9

2. I own/lease that property and have since JANUARY 1985

3. No well has existed on this parcel during any of the Time Periods. All of the water used by this parcel is provided through a metered connection from a well owned by the Reesedale Mutual Water District.

4. No

5. None

6. Not applicable

7. Residential use only.

8. None

9. All water is provided to this parcel by the Reesedale Mutual Water Company.

a.

10. See response to numbers 1 and 2.

11. Not applicable

12. Reesedale has the records concerning water usage.

13. I lack personal information to be able to respond further to this question. Please see the declaration submitted on behalf of Reesedale Water District.



I declare the foregoing to be true and correct under penalty of perjury under the laws of the State of California

Dated: 5-9-2015

By: Lee Susan Mansperger  
Lee Susan Mansperger

Indian Wells  
(760) 568-2611  
Los Angeles  
(213) 617-8100  
Ontario  
(909) 989-8584  
Riverside  
(951) 686-1450



**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

18101 Von Karman Avenue, Suite 1000, Irvine, CA 92612  
Phone: (949) 263-2600 | Fax: (949) 260-0972 | www.bbklaw.com

Sacramento  
(916) 325-4000  
San Diego  
(619) 525-1300  
Walnut Creek  
(925) 977-3300  
Washington, DC  
(202) 785-0600

**Jeffrey V. Dunn**  
(949) 263-2616  
jeffrey.dunn@bbklaw.com  
File No. 26345.00010

May 7, 2015

**VIA POSTING TO THE COURT'S WEBSITE AND E-MAIL**

|   |  |
|---|--|
| Rosamond Mobile Home Park<br>Robert Coldren (clo@coldrenlawoffices.com)                                   | Milana VII, LLC<br>Daniel T. Rudderow (danrudderow@gmail.com)  |
| Eyherabide Land Co.<br>Calvin Stead (cstead@bortonpetrini.com)<br>Kyle Holmes (kholmes@bortonpetrini.com) | Charles Tapia and Nellie Tapia Family Trust<br>Robert H. Brumfield (bob@brumfield-haganlaw.com)<br>Heather Ijames (heather@brumfield-haganlaw.com) |
| Desert Breeze MHP, LLC<br>Daniel Epstein (epstein14@yahoo.com)  | Reesdale Mutual Water Company<br>Kurt Stiefler (stieflerlaw@att.net)   |

Re: *Antelope Valley Groundwater Adjudication*  
Judicial Counsel Coordination Number 4408

Dear Counsel and Unrepresented Parties:

I write on behalf of the stipulating parties to the Proposed Judgment and Physical Solution in the above captioned case. Based on your court statements and/or communications with various stipulating parties, I understand that you wish to discuss settlement possibilities during the May 11, 2015 meet and confer session.

In anticipation of the settlement discussions, the stipulating parties request that you share the information and documents described below prior to Monday's meeting and bring such information with you on Monday. As background, this request is an abridged version of the Court's Phase 4 Discovery Order<sup>1</sup> and will help the stipulating parties understand your claim and facilitate a meaningful settlement discussion.

Please provide the following information and documents for the calendar years of 2000, 2001, 2002, 2003, 2004, 2011 or 2012 ("Time Periods"):

1. The Assessor Parcel Number, Assessor Tax Number, or Assessor's Identification Number of the parcel owned by you in the Antelope Valley Adjudication Area.

<sup>1</sup> The Phase 4 Discovery Order is available online at [http://www.scefiling.org/filingdocs/194/57805/92065\\_2012x12x11xJKxDiscoveryxOrderxforxPhasex4xTrial.pdf](http://www.scefiling.org/filingdocs/194/57805/92065_2012x12x11xJKxDiscoveryxOrderxforxPhasex4xTrial.pdf).



**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

May 7, 2015  
Page 2

2. The record title owner of the parcel referenced in subparagraph 1 from 2000 to present.
3. Whether a groundwater well existed on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
4. Whether a groundwater well was operated on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
5. The amount of groundwater produced from the parcel referenced in subparagraph 1 in any or all of the Time Periods.
6. The use(s) to which groundwater produced from the parcel was put on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
7. The use(s) to which the parcel referenced in subparagraph 1 was put during each of the calendar years 2011 and 2012.
8. The crop type, if any, grown on the parcel and irrigated acreage of such crop type during each of the calendar years during the Time Periods.
9. If you pump groundwater from another parcel for use on the parcel referenced in subparagraph 1 in any or all of the Time Periods, please identify the parcel from where water was pumped.
  - a. State the amount of water rights claimed as the reasonable and beneficial use for such parcel
10. For each parcel referenced in subparagraph 1, please indicate whether the parcel was leased during the Time Periods. If it was leased,
  - a. Provide the name of the lessee
  - b. The parcel's identification number
  - c. Whether the lease allocated credits for groundwater produced by lessee
  - d. Amount of groundwater produced by the lessee and delivered to another parcel and such parcel's identification number
  - e. If known, the use(s) to which groundwater was put to the leased parcel for calendar years 2011 and 2012.



**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

May 7, 2015  
Page 3

11. If you claim groundwater rights based upon something other than groundwater production or use, please state the claim for each of the Time Periods, and your legal and factual basis.
12. Documentations supporting your responses to requests 1 to 11, including but not limited to groundwater extraction notices, well logs, well efficiency test records, leases . . . etc.
13. All other information and documentations that substantiates your claim for water rights.

The stipulating parties request that your response be verified (e.g., provided under oath as true and correct).

Please provide the requested information either by posting them at the Court's website or email to me at [jeffrey.dunn@bbklaw.com](mailto:jeffrey.dunn@bbklaw.com) and copying Wendy Wang at [wendy.wang@bbklaw.com](mailto:wendy.wang@bbklaw.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeffrey V. Dunn', written over a horizontal line.

Jeffrey V. Dunn  
of BEST BEST & KRIEGER LLP

McLernon Declaration

DECLARATION CONCERNING WATER USE

I, Myrtle or Christine McLernon, declare:

I have personal knowledge of the facts set forth in this declaration and I could and would competently testify thereto under oath if called upon to do so. I am providing the following information in response to the Jeffrey Dunn's letter dated May 7, 2015 concerning the Antelope Valley Water Cases. The numbered responses below correspond to the questions set forth in that letter.

1. I am the occupant of the residential property located at:

Address: 8503 E AVE J

APN: 3376-5-15

2. I own/lease that property and have since \_\_\_\_\_

1997

3. No well has existed on this parcel during any of the Time Periods. All of the water used by this parcel is provided through a metered connection from a well owned by the Reesedale Mutual Water District.

4. No

5. None

6. Not applicable

7. Residential use only.

8. None

9. All water is provided to this parcel by the Reesedale Mutual Water Company.

a.

10. See response to numbers 1 and 2.

11. Not applicable

12. Reesedale has the records concerning water usage.

13. I lack personal information to be able to respond further to this question. Please see the declaration submitted on behalf of Reesedale Water District.

I declare the foregoing to be true and correct under penalty of perjury under the laws of the State of California

Dated: 5-9-15

By: Christine Bell McLernon

Christine Bell McLernon



Indian Wells  
(760) 568-2611  
Los Angeles  
(213) 617-8100  
Ontario  
(909) 989-8584  
Riverside  
(951) 686-1450

**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

18101 Von Karman Avenue, Suite 1000, Irvine, CA 92612  
Phone: (949) 263-2600 | Fax: (949) 260-0972 | www.bbklaw.com

Sacramento  
(916) 325-4000  
San Diego  
(619) 525-1300  
Walnut Creek  
(925) 977-3300  
Washington, DC  
(202) 785-0600

**Jeffrey V. Dunn**  
(949) 263-2616  
jeffrey.dunn@bbklaw.com  
File No. 26345.00010

May 7, 2015

**VIA POSTING TO THE COURT'S WEBSITE AND E-MAIL**

Rosamond Mobile Home Park  
Robert Coldren (clo@coldrenlawoffices.com)

Milana VII, LLC  
Daniel T. Rudderow (danrudderow@gmail.com)

Eyherabide Land Co.  
Calvin Stead (cstead@bortonpetrini.com)  
Kyle Holmes (kholmes@bortonpetrini.com)

Charles Tapia and Nellie Tapia Family Trust  
Robert H. Brumfield (bob@brumfield-haganlaw.com)  
Heather Ijames (heather@brumfield-haganlaw.com)

Desert Breeze MHP, LLC  
Daniel Epstein (epstein14@yahoo.com)

Reesdale Mutual Water Company  
Kurt Stiefler (stieflerlaw@att.net)

Re: *Antelope Valley Groundwater Adjudication*  
Judicial Counsel Coordination Number 4408

Dear Counsel and Unrepresented Parties:

I write on behalf of the stipulating parties to the Proposed Judgment and Physical Solution in the above captioned case. Based on your court statements and/or communications with various stipulating parties, I understand that you wish to discuss settlement possibilities during the May 11, 2015 meet and confer session.

In anticipation of the settlement discussions, the stipulating parties request that you share the information and documents described below prior to Monday's meeting and bring such information with you on Monday. As background, this request is an abridged version of the Court's Phase 4 Discovery Order<sup>1</sup> and will help the stipulating parties understand your claim and facilitate a meaningful settlement discussion.

Please provide the following information and documents for the calendar years of 2000, 2001, 2002, 2003, 2004, 2011 or 2012 ("Time Periods"):

1. The Assessor Parcel Number, Assessor Tax Number, or Assessor's Identification Number of the parcel owned by you in the Antelope Valley Adjudication Area.

<sup>1</sup> The Phase 4 Discovery Order is available online at [http://www.scefiling.org/filingdocs/194/57805/92065\\_2012x12x11xJKxDiscoveryxOrderxforxPhasex4xTrial.pdf](http://www.scefiling.org/filingdocs/194/57805/92065_2012x12x11xJKxDiscoveryxOrderxforxPhasex4xTrial.pdf).





**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

May 7, 2015  
Page 2

2. The record title owner of the parcel referenced in subparagraph 1 from 2000 to present.
3. Whether a groundwater well existed on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
4. Whether a groundwater well was operated on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
5. The amount of groundwater produced from the parcel referenced in subparagraph 1 in any or all of the Time Periods.
6. The use(s) to which groundwater produced from the parcel was put on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
7. The use(s) to which the parcel referenced in subparagraph 1 was put during each of the calendar years 2011 and 2012.
8. The crop type, if any, grown on the parcel and irrigated acreage of such crop type during each of the calendar years during the Time Periods.
9. If you pump groundwater from another parcel for use on the parcel referenced in subparagraph 1 in any or all of the Time Periods, please identify the parcel from where water was pumped.
  - a. State the amount of water rights claimed as the reasonable and beneficial use for such parcel
10. For each parcel referenced in subparagraph 1, please indicate whether the parcel was leased during the Time Periods. If it was leased,
  - a. Provide the name of the lessee
  - b. The parcel's identification number
  - c. Whether the lease allocated credits for groundwater produced by lessee
  - d. Amount of groundwater produced by the lessee and delivered to another parcel and such parcel's identification number
  - e. If known, the use(s) to which groundwater was put to the leased parcel for calendar years 2011 and 2012.



**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

May 7, 2015  
Page 3

11. If you claim groundwater rights based upon something other than groundwater production or use, please state the claim for each of the Time Periods, and your legal and factual basis.
12. Documentations supporting your responses to requests 1 to 11, including but not limited to groundwater extraction notices, well logs, well efficiency test records, leases . . . etc.
13. All other information and documentations that substantiates your claim for water rights.

The stipulating parties request that your response be verified (e.g., provided under oath as true and correct).

Please provide the requested information either by posting them at the Court's website or email to me at [jeffrey.dunn@bbklaw.com](mailto:jeffrey.dunn@bbklaw.com) and copying Wendy Wang at [wendy.wang@bbklaw.com](mailto:wendy.wang@bbklaw.com).

Sincerely,

Jeffrey V. Dunn  
of BEST BEST & KRIEGER LLP

Thomson Declaration

DECLARATION CONCERNING WATER USE

I, Tommy Thompson, declare:

I have personal knowledge of the facts set forth in this declaration and I could and would competently testify thereto under oath if called upon to do so. I am providing the following information in response to the Jeffrey Dunn's letter dated May 7, 2015 concerning the Antelope Valley Water Cases. The numbered responses below correspond to the questions set forth in that letter.

1. I am the occupant of the residential property located at:

Address: 8760 E. Ave J

APN: 3376-27-18

2. I ~~own~~/lease that property and have since August 2013

3. No well has existed on this parcel during any of the Time Periods. All of the water used by this parcel is provided through a metered connection from a well owned by the Reesedale Mutual Water District.

4. No

5. None

6. Not applicable

7. Residential use only.

8. None

9. All water is provided to this parcel by the Reesedale Mutual Water Company.

a.

10. See response to numbers 1 and 2.

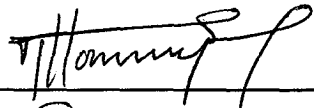
11. Not applicable

12. Reesedale has the records concerning water usage.

13. I lack personal information to be able to respond further to this question. Please see the declaration submitted on behalf of Reesedale Water District.

I declare the foregoing to be true and correct under penalty of perjury under the laws of the State of California

Dated: 05/09/15

By:   
Thomas Thompson



Indian Wells  
(760) 568-2611

Los Angeles  
(213) 617-8100

Ontario  
(909) 989-8584

Riverside  
(951) 686-1450

**BEST BEST & KRIEGER LLP**  
**ATTORNEYS AT LAW**

18101 Von Karman Avenue, Suite 1000, Irvine, CA 92612  
Phone: (949) 263-2600 | Fax: (949) 260-0972 | www.bbklaw.com

Sacramento  
(916) 325-4000

San Diego  
(619) 525-1300

Walnut Creek  
(925) 977-3300

Washington, DC  
(202) 785-0600

**Jeffrey V. Dunn**  
(949) 263-2616  
jeffrey.dunn@bbklaw.com  
File No. 26345.00010

May 7, 2015

**VIA POSTING TO THE COURT'S WEBSITE AND E-MAIL**

Rosamond Mobile Home Park  
Robert Coldren (clo@coldrenlawoffices.com)

Milana VII, LLC  
Daniel T. Rudderow (danrudderow@gmail.com)

Eyherabide Land Co.  
Calvin Stead (cstead@bortonpetrini.com)  
Kyle Holmes (kholmes@bortonpetrini.com)

Charles Tapia and Nellie Tapia Family Trust  
Robert H. Brumfield (bob@brumfield-haganlaw.com)  
Heather Ijames (heather@brumfield-haganlaw.com)

Desert Breeze MHP, LLC  
Daniel Epstein (epstein14@yahoo.com)

Reesdale Mutual Water Company  
Kurt Stiefler (stieflerlaw@att.net)

Re: *Antelope Valley Groundwater Adjudication*  
Judicial Counsel Coordination Number 4408

Dear Counsel and Unrepresented Parties:

I write on behalf of the stipulating parties to the Proposed Judgment and Physical Solution in the above captioned case. Based on your court statements and/or communications with various stipulating parties, I understand that you wish to discuss settlement possibilities during the May 11, 2015 meet and confer session.

In anticipation of the settlement discussions, the stipulating parties request that you share the information and documents described below prior to Monday's meeting and bring such information with you on Monday. As background, this request is an abridged version of the Court's Phase 4 Discovery Order<sup>1</sup> and will help the stipulating parties understand your claim and facilitate a meaningful settlement discussion.

Please provide the following information and documents for the calendar years of 2000, 2001, 2002, 2003, 2004, 2011 or 2012 ("Time Periods"):

1. The Assessor Parcel Number, Assessor Tax Number, or Assessor's Identification Number of the parcel owned by you in the Antelope Valley Adjudication Area.

<sup>1</sup> The Phase 4 Discovery Order is available online at  
[http://www.scefiling.org/filingdocs/194/57805/92065\\_2012x12x11xJKxDiscoveryxOrderxforxPhasex4xTrial.pdf](http://www.scefiling.org/filingdocs/194/57805/92065_2012x12x11xJKxDiscoveryxOrderxforxPhasex4xTrial.pdf).



**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

May 7, 2015  
Page 2

2. The record title owner of the parcel referenced in subparagraph 1 from 2000 to present.
3. Whether a groundwater well existed on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
4. Whether a groundwater well was operated on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
5. The amount of groundwater produced from the parcel referenced in subparagraph 1 in any or all of the Time Periods.
6. The use(s) to which groundwater produced from the parcel was put on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
7. The use(s) to which the parcel referenced in subparagraph 1 was put during each of the calendar years 2011 and 2012.
8. The crop type, if any, grown on the parcel and irrigated acreage of such crop type during each of the calendar years during the Time Periods.
9. If you pump groundwater from another parcel for use on the parcel referenced in subparagraph 1 in any or all of the Time Periods, please identify the parcel from where water was pumped.
  - a. State the amount of water rights claimed as the reasonable and beneficial use for such parcel
10. For each parcel referenced in subparagraph 1, please indicate whether the parcel was leased during the Time Periods. If it was leased,
  - a. Provide the name of the lessee
  - b. The parcel's identification number
  - c. Whether the lease allocated credits for groundwater produced by lessee
  - d. Amount of groundwater produced by the lessee and delivered to another parcel and such parcel's identification number
  - e. If known, the use(s) to which groundwater was put to the leased parcel for calendar years 2011 and 2012.



**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

May 7, 2015  
Page 3

11. If you claim groundwater rights based upon something other than groundwater production or use, please state the claim for each of the Time Periods, and your legal and factual basis.
12. Documentations supporting your responses to requests 1 to 11, including but not limited to groundwater extraction notices, well logs, well efficiency test records, leases . . . etc.
13. All other information and documentations that substantiates your claim for water rights.

The stipulating parties request that your response be verified (e.g., provided under oath as true and correct).

Please provide the requested information either by posting them at the Court's website or email to me at [jeffrey.dunn@bbklaw.com](mailto:jeffrey.dunn@bbklaw.com) and copying Wendy Wang at [wendy.wang@bbklaw.com](mailto:wendy.wang@bbklaw.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeffrey V. Dunn', written over a horizontal line.

Jeffrey V. Dunn  
of BEST BEST & KRIEGER LLP



Hopkins Declaration

DECLARATION CONCERNING WATER USE

I, Donna Hopkins, declare:

I have personal knowledge of the facts set forth in this declaration and I could and would competently testify thereto under oath if called upon to do so. I am providing the following information in response to the Jeffrey Dunn's letter dated May 7, 2015 concerning the Antelope Valley Water Cases. The numbered responses below correspond to the questions set forth in that letter.

1. I am the occupant of the residential property located at:

Address: 8531 E. Nugent

APN: 3376-4-18

2.  I own/lease that property and have since Feb 14 1983

3. No well has existed on this parcel during any of the Time Periods. All of the water used by this parcel is provided through a metered connection from a well owned by the Reesedale Mutual Water District.

4. No

5. None

6. Not applicable

7. Residential use only.

8. None

9. All water is provided to this parcel by the Reesedale Mutual Water Company.

a.

10. See response to numbers 1 and 2.

11. Not applicable

12. Reesedale has the records concerning water usage.

13. I lack personal information to be able to respond further to this question. Please see the declaration submitted on behalf of Reesedale Water District.

I declare the foregoing to be true and correct under penalty of perjury under the laws of the State of California

Dated: 5/9/15

By: Donna J Hopkins  
DONNA J HOPKINS



Indian Wells  
(760) 568-2611  
Los Angeles  
(213) 617-8100  
Ontario  
(909) 989-8584  
Riverside  
(951) 686-1450

**BEST BEST & KRIEGER LLP**  
ATTORNEYS AT LAW

18101 Von Karman Avenue, Suite 1000, Irvine, CA 92612  
Phone: (949) 263-2600 | Fax: (949) 260-0972 | www.bbklaw.com

Sacramento  
(916) 325-4000  
San Diego  
(619) 525-1300  
Walnut Creek  
(925) 977-3300  
Washington, DC  
(202) 785-0600

**Jeffrey V. Dunn**  
(949) 263-2616  
jeffrey.dunn@bbklaw.com  
File No. 26345.00010

May 7, 2015

**VIA POSTING TO THE COURT'S WEBSITE AND E-MAIL**

Rosamond Mobile Home Park  
Robert Coldren (clo@coldrenlawoffices.com)

Milana VII, LLC  
Daniel T. Rudderow (danrudderow@gmail.com)

Eyherabide Land Co.  
Calvin Stead (cstead@bortonpetrini.com)  
Kyle Holmes (kholmes@bortonpetrini.com)

Charles Tapia and Nellie Tapia Family Trust  
Robert H. Brumfield (bob@brumfield-haganlaw.com)  
Heather Ijames (heather@brumfield-haganlaw.com)

Desert Breeze MHP, LLC  
Daniel Epstein (epstein14@yahoo.com)

Reesdale Mutual Water Company  
Kurt Stiefler (stieflerlaw@att.net)

Re: *Antelope Valley Groundwater Adjudication*  
Judicial Counsel Coordination Number 4408

Dear Counsel and Unrepresented Parties:

I write on behalf of the stipulating parties to the Proposed Judgment and Physical Solution in the above captioned case. Based on your court statements and/or communications with various stipulating parties, I understand that you wish to discuss settlement possibilities during the May 11, 2015 meet and confer session.

In anticipation of the settlement discussions, the stipulating parties request that you share the information and documents described below prior to Monday's meeting and bring such information with you on Monday. As background, this request is an abridged version of the Court's Phase 4 Discovery Order<sup>1</sup> and will help the stipulating parties understand your claim and facilitate a meaningful settlement discussion.

Please provide the following information and documents for the calendar years of 2000, 2001, 2002, 2003, 2004, 2011 or 2012 ("Time Periods"):

1. The Assessor Parcel Number, Assessor Tax Number, or Assessor's Identification Number of the parcel owned by you in the Antelope Valley Adjudication Area.

<sup>1</sup> The Phase 4 Discovery Order is available online at [http://www.scefiling.org/filingdocs/194/57805/92065\\_2012x12x11xJKxDiscoveryxOrderxforxPhasex4xTrial.pdf](http://www.scefiling.org/filingdocs/194/57805/92065_2012x12x11xJKxDiscoveryxOrderxforxPhasex4xTrial.pdf).



**BEST BEST & KRIEGER LLP**  
ATTORNEYS AT LAW

May 7, 2015  
Page 2

2. The record title owner of the parcel referenced in subparagraph 1 from 2000 to present.
3. Whether a groundwater well existed on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
4. Whether a groundwater well was operated on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
5. The amount of groundwater produced from the parcel referenced in subparagraph 1 in any or all of the Time Periods.
6. The use(s) to which groundwater produced from the parcel was put on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
7. The use(s) to which the parcel referenced in subparagraph 1 was put during each of the calendar years 2011 and 2012.
8. The crop type, if any, grown on the parcel and irrigated acreage of such crop type during each of the calendar years during the Time Periods.
9. If you pump groundwater from another parcel for use on the parcel referenced in subparagraph 1 in any or all of the Time Periods, please identify the parcel from where water was pumped.
  - a. State the amount of water rights claimed as the reasonable and beneficial use for such parcel
10. For each parcel referenced in subparagraph 1, please indicate whether the parcel was leased during the Time Periods. If it was leased,
  - a. Provide the name of the lessee
  - b. The parcel's identification number
  - c. Whether the lease allocated credits for groundwater produced by lessee
  - d. Amount of groundwater produced by the lessee and delivered to another parcel and such parcel's identification number
  - e. If known, the use(s) to which groundwater was put to the leased parcel for calendar years 2011 and 2012.



**BEST BEST & KRIEGER<sup>LLP</sup>**  
**ATTORNEYS AT LAW**

May 7, 2015  
Page 3

11. If you claim groundwater rights based upon something other than groundwater production or use, please state the claim for each of the Time Periods, and your legal and factual basis.
12. Documentations supporting your responses to requests 1 to 11, including but not limited to groundwater extraction notices, well logs, well efficiency test records, leases . . . etc.
13. All other information and documentations that substantiates your claim for water rights.

The stipulating parties request that your response be verified (e.g., provided under oath as true and correct).

Please provide the requested information either by posting them at the Court's website or email to me at [jeffrey.dunn@bbklaw.com](mailto:jeffrey.dunn@bbklaw.com) and copying Wendy Wang at [wendy.wang@bbklaw.com](mailto:wendy.wang@bbklaw.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeffrey V. Dunn', written over a light blue horizontal line.

Jeffrey V. Dunn  
of BEST BEST & KRIEGER LLP

Medlin Declaration

DECLARATION CONCERNING WATER USE

I, Bill Medlin or Chris Medlin, declare:

I have personal knowledge of the facts set forth in this declaration and I could and would competently testify thereto under oath if called upon to do so. I am providing the following information in response to the Jeffrey Dunn's letter dated May 7, 2015 concerning the Antelope Valley Water Cases. The numbered responses below correspond to the questions set forth in that letter.

1. I am the occupant of the residential property located at:

Address: 44544 N 86th St E.

APN: 3374-5-2

2. I ~~own~~/lease that property and have since 5-5-13

3. No well has existed on this parcel during any of the Time Periods. All of the water used by this parcel is provided through a metered connection from a well owned by the Reesedale Mutual Water District.

4. No

5. None

6. Not applicable

7. Residential use only.

8. None

9. All water is provided to this parcel by the Reesedale Mutual Water Company.

a.

10. See response to numbers 1 and 2.

11. Not applicable

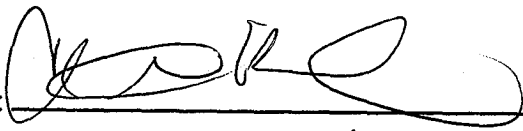
12. Reesedale has the records concerning water usage.

13. I lack personal information to be able to respond further to this question. Please see the declaration submitted on behalf of Reesedale Water District.



I declare the foregoing to be true and correct under penalty of perjury under the laws of the State of California

Dated: 5-9-15

By:   
CHRISTINE R. MEDINA



**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

Indian Wells  
(760) 568-2611  
Los Angeles  
(213) 617-8100  
Ontario  
(909) 989-8584  
Riverside  
(951) 686-1450

18101 Von Karman Avenue, Suite 1000, Irvine, CA 92612  
Phone: (949) 263-2600 | Fax: (949) 260-0972 | www.bbklaw.com

Sacramento  
(916) 325-4000  
San Diego  
(619) 525-1300  
Walnut Creek  
(925) 977-3300  
Washington, DC  
(202) 785-0600

**Jeffrey V. Dunn**  
(949) 263-2616  
jeffrey.dunn@bbklaw.com  
File No. 26345.00010

May 7, 2015

**VIA POSTING TO THE COURT'S WEBSITE AND E-MAIL**

Rosamond Mobile Home Park  
Robert Coldren (clo@coldrenlawoffices.com)

Milana VII, LLC  
Daniel T. Rudderow (danrudderow@gmail.com)

Eyherabide Land Co.  
Calvin Stead (cstead@bortonpetrini.com)  
Kyle Holmes (kholmes@bortonpetrini.com)

Charles Tapia and Nellie Tapia Family Trust  
Robert H. Brumfield (bob@brumfield-haganlaw.com)  
Heather Ijames (heather@brumfield-haganlaw.com)

Desert Breeze MHP, LLC  
Daniel Epstein (epstein14@yahoo.com)

Reesdale Mutual Water Company  
Kurt Stiefler (stieflerlaw@att.net)

Re: *Antelope Valley Groundwater Adjudication*  
Judicial Counsel Coordination Number 4408

Dear Counsel and Unrepresented Parties:

I write on behalf of the stipulating parties to the Proposed Judgment and Physical Solution in the above captioned case. Based on your court statements and/or communications with various stipulating parties, I understand that you wish to discuss settlement possibilities during the May 11, 2015 meet and confer session.

In anticipation of the settlement discussions, the stipulating parties request that you share the information and documents described below prior to Monday's meeting and bring such information with you on Monday. As background, this request is an abridged version of the Court's Phase 4 Discovery Order<sup>1</sup> and will help the stipulating parties understand your claim and facilitate a meaningful settlement discussion.

Please provide the following information and documents for the calendar years of 2000, 2001, 2002, 2003, 2004, 2011 or 2012 ("Time Periods"):

1. The Assessor Parcel Number, Assessor Tax Number, or Assessor's Identification Number of the parcel owned by you in the Antelope Valley Adjudication Area.

<sup>1</sup> The Phase 4 Discovery Order is available online at  
[http://www.scefiling.org/filingdocs/194/57805/92065\\_2012x12x11xJKxDiscoveryxOrderxforxPhasex4xTrial.pdf](http://www.scefiling.org/filingdocs/194/57805/92065_2012x12x11xJKxDiscoveryxOrderxforxPhasex4xTrial.pdf)



**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

May 7, 2015  
Page 2

2. The record title owner of the parcel referenced in subparagraph 1 from 2000 to present.
3. Whether a groundwater well existed on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
4. Whether a groundwater well was operated on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
5. The amount of groundwater produced from the parcel referenced in subparagraph 1 in any or all of the Time Periods.
6. The use(s) to which groundwater produced from the parcel was put on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
7. The use(s) to which the parcel referenced in subparagraph 1 was put during each of the calendar years 2011 and 2012.
8. The crop type, if any, grown on the parcel and irrigated acreage of such crop type during each of the calendar years during the Time Periods.
9. If you pump groundwater from another parcel for use on the parcel referenced in subparagraph 1 in any or all of the Time Periods, please identify the parcel from where water was pumped.
  - a. State the amount of water rights claimed as the reasonable and beneficial use for such parcel
10. For each parcel referenced in subparagraph 1, please indicate whether the parcel was leased during the Time Periods. If it was leased,
  - a. Provide the name of the lessee
  - b. The parcel's identification number
  - c. Whether the lease allocated credits for groundwater produced by lessee
  - d. Amount of groundwater produced by the lessee and delivered to another parcel and such parcel's identification number
  - e. If known, the use(s) to which groundwater was put to the leased parcel for calendar years 2011 and 2012.



**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

May 7, 2015  
Page 3

11. If you claim groundwater rights based upon something other than groundwater production or use, please state the claim for each of the Time Periods, and your legal and factual basis.
12. Documentations supporting your responses to requests 1 to 11, including but not limited to groundwater extraction notices, well logs, well efficiency test records, leases . . . etc.
13. All other information and documentations that substantiates your claim for water rights.

The stipulating parties request that your response be verified (e.g., provided under oath as true and correct).

Please provide the requested information either by posting them at the Court's website or email to me at [jeffrey.dunn@bbklaw.com](mailto:jeffrey.dunn@bbklaw.com) and copying Wendy Wang at [wendy.wang@bbklaw.com](mailto:wendy.wang@bbklaw.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeffrey V. Dunn', written over a horizontal line.

Jeffrey V. Dunn  
of BEST BEST & KRIEGER LLP

Parker Declaration

DECLARATION CONCERNING WATER USE

I, Bulon Parker, declare:

I have personal knowledge of the facts set forth in this declaration and I could and would competently testify thereto under oath if called upon to do so. I am providing the following information in response to the Jeffrey Dunn's letter dated May 7, 2015 concerning the Antelope Valley Water Cases. The numbered responses below correspond to the questions set forth in that letter.

1. I am the occupant of the residential property located at:

Address: 44609 86<sup>th</sup> St E

APN: 3376-4-17

2. I own/~~have~~ that property and have since 4-26-96

3. No well has existed on this parcel during any of the Time Periods. All of the water used by this parcel is provided through a metered connection from a well owned by the Reesedale Mutual Water District.

4. No

5. None

6. Not applicable

7. Residential use only.

8. None

9. All water is provided to this parcel by the Reesedale Mutual Water Company.

a.

10. See response to numbers 1 and 2.

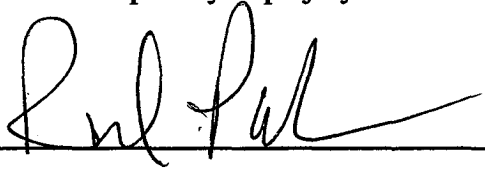
11. Not applicable

12. Reesedale has the records concerning water usage.

13. I lack personal information to be able to respond further to this question. Please see the declaration submitted on behalf of Reesedale Water District.

I declare the foregoing to be true and correct under penalty of perjury under the laws of the State of California

Dated:

By:  \_\_\_\_\_



**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

Indian Wells  
(760) 568-2611  
Los Angeles  
(213) 617-8100  
Ontario  
(909) 989-8584  
Riverside  
(951) 686-1450

18101 Von Karman Avenue, Suite 1000, Irvine, CA 92612  
Phone: (949) 263-2600 | Fax: (949) 260-0972 | www.bbklaw.com

Sacramento  
(916) 325-4000  
San Diego  
(619) 525-1300  
Walnut Creek  
(925) 977-3300  
Washington, DC  
(202) 785-0600

**Jeffrey V. Dunn**  
(949) 263-2616  
jeffrey.dunn@bbklaw.com  
File No. 26345.00010

May 7, 2015

**VIA POSTING TO THE COURT'S WEBSITE AND E-MAIL**

Rosamond Mobile Home Park  
Robert Coldren (clo@coldrenlawoffices.com)

Milana VII, LLC  
Daniel T. Rudderow (danrudderow@gmail.com)

Eyherabide Land Co.  
Calvin Stead (cstead@bortonpetrini.com)  
Kyle Holmes (kholmes@bortonpetrini.com)

Charles Tapia and Nellie Tapia Family Trust  
Robert H. Brumfield (bob@brumfield-haganlaw.com)  
Heather Ijames (heather@brumfield-haganlaw.com)

Desert Breeze MHP, LLC  
Daniel Epstein (epstein14@yahoo.com)

Reesdale Mutual Water Company  
Kurt Stiefler (stieflerlaw@att.net)

Re: *Antelope Valley Groundwater Adjudication*  
Judicial Counsel Coordination Number 4408

Dear Counsel and Unrepresented Parties:

I write on behalf of the stipulating parties to the Proposed Judgment and Physical Solution in the above captioned case. Based on your court statements and/or communications with various stipulating parties, I understand that you wish to discuss settlement possibilities during the May 11, 2015 meet and confer session.

In anticipation of the settlement discussions, the stipulating parties request that you share the information and documents described below prior to Monday's meeting and bring such information with you on Monday. As background, this request is an abridged version of the Court's Phase 4 Discovery Order<sup>1</sup> and will help the stipulating parties understand your claim and facilitate a meaningful settlement discussion.

Please provide the following information and documents for the calendar years of 2000, 2001, 2002, 2003, 2004, 2011 or 2012 ("Time Periods"):

1. The Assessor Parcel Number, Assessor Tax Number, or Assessor's Identification Number of the parcel owned by you in the Antelope Valley Adjudication Area.

<sup>1</sup> The Phase 4 Discovery Order is available online at [http://www.scefiling.org/filingdocs/194/57805/92065\\_2012x12x11xJKxDiscoveryxOrderxforxPhasex4xTrial.pdf](http://www.scefiling.org/filingdocs/194/57805/92065_2012x12x11xJKxDiscoveryxOrderxforxPhasex4xTrial.pdf).





**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

May 7, 2015  
Page 2

2. The record title owner of the parcel referenced in subparagraph 1 from 2000 to present.
3. Whether a groundwater well existed on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
4. Whether a groundwater well was operated on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
5. The amount of groundwater produced from the parcel referenced in subparagraph 1 in any or all of the Time Periods.
6. The use(s) to which groundwater produced from the parcel was put on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
7. The use(s) to which the parcel referenced in subparagraph 1 was put during each of the calendar years 2011 and 2012.
8. The crop type, if any, grown on the parcel and irrigated acreage of such crop type during each of the calendar years during the Time Periods.
9. If you pump groundwater from another parcel for use on the parcel referenced in subparagraph 1 in any or all of the Time Periods, please identify the parcel from where water was pumped.
  - a. State the amount of water rights claimed as the reasonable and beneficial use for such parcel
10. For each parcel referenced in subparagraph 1, please indicate whether the parcel was leased during the Time Periods. If it was leased,
  - a. Provide the name of the lessee
  - b. The parcel's identification number
  - c. Whether the lease allocated credits for groundwater produced by lessee
  - d. Amount of groundwater produced by the lessee and delivered to another parcel and such parcel's identification number
  - e. If known, the use(s) to which groundwater was put to the leased parcel for calendar years 2011 and 2012.



**BEST BEST & KRIEGER LLP**  
ATTORNEYS AT LAW

May 7, 2015  
Page 3

11. If you claim groundwater rights based upon something other than groundwater production or use, please state the claim for each of the Time Periods, and your legal and factual basis.
12. Documentations supporting your responses to requests 1 to 11, including but not limited to groundwater extraction notices, well logs, well efficiency test records, leases . . . etc.
13. All other information and documentations that substantiates your claim for water rights.

The stipulating parties request that your response be verified (e.g., provided under oath as true and correct).

Please provide the requested information either by posting them at the Court's website or email to me at [jeffrey.dunn@bbklaw.com](mailto:jeffrey.dunn@bbklaw.com) and copying Wendy Wang at [wendy.wang@bbklaw.com](mailto:wendy.wang@bbklaw.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeffrey V. Dunn'.

Jeffrey V. Dunn  
of BEST BEST & KRIEGER LLP

Coleal Declaration

DECLARATION CONCERNING WATER USE

I, Ernest Coleal, declare:

I have personal knowledge of the facts set forth in this declaration and I could and would competently testify thereto under oath if called upon to do so. I am providing the following information in response to the Jeffrey Dunn's letter dated May 7, 2015 concerning the Antelope Valley Water Cases. The numbered responses below correspond to the questions set forth in that letter.

1. I am the occupant of the residential property located at:

Address: 44723 N. 86<sup>th</sup> St E

APN: 3376-4-9

2. I  own  lease that property and have since 1956

3. No well has existed on this parcel during any of the Time Periods. All of the water used by this parcel is provided through a metered connection from a well owned by the Reesedale Mutual Water District.

4. No

5. None

6. Not applicable

7. Residential use only.

8. None

9. All water is provided to this parcel by the Reesedale Mutual Water Company.

a.

10. See response to numbers 1 and 2.

11. Not applicable

12. Reesedale has the records concerning water usage.

13. I lack personal information to be able to respond further to this question. Please see the declaration submitted on behalf of Reesedale Water District.

I declare the foregoing to be true and correct under penalty of perjury under the laws of the State of California

Dated:

By: Ernest Coleal  
Ernest Coleal

Indian Wells  
(760) 568-2611  
Los Angeles  
(213) 617-8100  
Ontario  
(909) 989-8584  
Riverside  
(951) 686-1450



**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

18101 Von Karman Avenue, Suite 1000, Irvine, CA 92612  
Phone: (949) 263-2600 | Fax: (949) 260-0972 | www.bbklaw.com

Sacramento  
(916) 325-4000  
San Diego  
(619) 525-1300  
Walnut Creek  
(925) 977-3300  
Washington, DC  
(202) 785-0600

**Jeffrey V. Dunn**  
(949) 263-2616  
jeffrey.dunn@bbklaw.com  
File No. 26345.00010

May 7, 2015

**VIA POSTING TO THE COURT'S WEBSITE AND E-MAIL**

Rosamond Mobile Home Park  
Robert Coldren (clo@coldrenlawoffices.com)

Milana VII, LLC  
Daniel T. Rudderow (danrudderow@gmail.com)

Eyherabide Land Co.  
Calvin Stead (cstead@bortonpetrini.com)  
Kyle Holmes (kholmes@bortonpetrini.com)

Charles Tapia and Nellie Tapia Family Trust  
Robert H. Brumfield (bob@brumfield-haganlaw.com)  
Heather Ijames (heather@brumfield-haganlaw.com)

Desert Breeze MHP, LLC  
Daniel Epstein (epstein14@yahoo.com)

Reesdale Mutual Water Company  
Kurt Stiefler (stieflerlaw@att.net)

Re: *Antelope Valley Groundwater Adjudication*  
Judicial Counsel Coordination Number 4408

Dear Counsel and Unrepresented Parties:

I write on behalf of the stipulating parties to the Proposed Judgment and Physical Solution in the above captioned case. Based on your court statements and/or communications with various stipulating parties, I understand that you wish to discuss settlement possibilities during the May 11, 2015 meet and confer session.

In anticipation of the settlement discussions, the stipulating parties request that you share the information and documents described below prior to Monday's meeting and bring such information with you on Monday. As background, this request is an abridged version of the Court's Phase 4 Discovery Order<sup>1</sup> and will help the stipulating parties understand your claim and facilitate a meaningful settlement discussion.

Please provide the following information and documents for the calendar years of 2000, 2001, 2002, 2003, 2004, 2011 or 2012 ("Time Periods"):

1. The Assessor Parcel Number, Assessor Tax Number, or Assessor's Identification Number of the parcel owned by you in the Antelope Valley Adjudication Area.

<sup>1</sup> The Phase 4 Discovery Order is available online at [http://www.sceffiling.org/filingdocs/194/57805/92065\\_2012x12x11xJKxDiscoveryxOrderxforxPhasex4xTrial.pdf](http://www.sceffiling.org/filingdocs/194/57805/92065_2012x12x11xJKxDiscoveryxOrderxforxPhasex4xTrial.pdf).



**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

May 7, 2015  
Page 2

2. The record title owner of the parcel referenced in subparagraph 1 from 2000 to present.
3. Whether a groundwater well existed on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
4. Whether a groundwater well was operated on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
5. The amount of groundwater produced from the parcel referenced in subparagraph 1 in any or all of the Time Periods.
6. The use(s) to which groundwater produced from the parcel was put on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
7. The use(s) to which the parcel referenced in subparagraph 1 was put during each of the calendar years 2011 and 2012.
8. The crop type, if any, grown on the parcel and irrigated acreage of such crop type during each of the calendar years during the Time Periods.
9. If you pump groundwater from another parcel for use on the parcel referenced in subparagraph 1 in any or all of the Time Periods, please identify the parcel from where water was pumped.
  - a. State the amount of water rights claimed as the reasonable and beneficial use for such parcel
10. For each parcel referenced in subparagraph 1, please indicate whether the parcel was leased during the Time Periods. If it was leased,
  - a. Provide the name of the lessee
  - b. The parcel's identification number
  - c. Whether the lease allocated credits for groundwater produced by lessee
  - d. Amount of groundwater produced by the lessee and delivered to another parcel and such parcel's identification number
  - e. If known, the use(s) to which groundwater was put to the leased parcel for calendar years 2011 and 2012.



**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

May 7, 2015  
Page 3

11. If you claim groundwater rights based upon something other than groundwater production or use, please state the claim for each of the Time Periods, and your legal and factual basis.
12. Documentations supporting your responses to requests 1 to 11, including but not limited to groundwater extraction notices, well logs, well efficiency test records, leases . . . etc.
13. All other information and documentations that substantiates your claim for water rights.

The stipulating parties request that your response be verified (e.g., provided under oath as true and correct).

Please provide the requested information either by posting them at the Court's website or email to me at [jeffrey.dunn@bbklaw.com](mailto:jeffrey.dunn@bbklaw.com) and copying Wendy Wang at [wendy.wang@bbklaw.com](mailto:wendy.wang@bbklaw.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeffrey V. Dunn', written over a light blue horizontal line.

Jeffrey V. Dunn  
of BEST BEST & KRIEGER LLP



Ellis Declaration

DECLARATION CONCERNING WATER USE

I, Patricia ELLIS, declare:

I have personal knowledge of the facts set forth in this declaration and I could and would competently testify thereto under oath if called upon to do so. I am providing the following information in response to the Jeffrey Dunn's letter dated May 7, 2015 concerning the Antelope Valley Water Cases. The numbered responses below correspond to the questions set forth in that letter.

1. I am the occupant of the residential property located at:

Address: 44741 N. 86<sup>th</sup> St E

APN: 3376-4-3

2.  I own/lease that property and have since 1985

3. No well has existed on this parcel during any of the Time Periods. All of the water used by this parcel is provided through a metered connection from a well owned by the Reesedale Mutual Water District.

4. No

5. None

6. Not applicable

7. Residential use only.

8. None

9. All water is provided to this parcel by the Reesedale Mutual Water Company.

a.

10. See response to numbers 1 and 2.

11. Not applicable

12. Reesedale has the records concerning water usage.

13. I lack personal information to be able to respond further to this question. Please see the declaration submitted on behalf of Reesedale Water District.

I declare the foregoing to be true and correct under penalty of perjury under the laws of the State of California

Dated:

By: Patricia Ellis  
Patricia Ellis



**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

Indian Wells  
(760) 568-2611  
Los Angeles  
(213) 617-8100  
Ontario  
(909) 989-8584  
Riverside  
(951) 686-1450

18101 Von Karman Avenue, Suite 1000, Irvine, CA 92612  
Phone: (949) 263-2600 | Fax: (949) 260-0972 | www.bbklaw.com

Sacramento  
(916) 325-4000  
San Diego  
(619) 525-1300  
Walnut Creek  
(925) 977-3300  
Washington, DC  
(202) 785-0600

**Jeffrey V. Dunn**  
(949) 263-2616  
jeffrey.dunn@bbklaw.com  
File No. 26345.00010

May 7, 2015

**VIA POSTING TO THE COURT'S WEBSITE AND E-MAIL**

Rosamond Mobile Home Park  
Robert Coldren (clo@coldrenlawoffices.com)

Milana VII, LLC  
Daniel T. Rudderow (danrudderow@gmail.com)

Eyherabide Land Co.  
Calvin Stead (cstead@bortonpetrini.com)  
Kyle Holmes (kholmes@bortonpetrini.com)

Charles Tapia and Nellie Tapia Family Trust  
Robert H. Brumfield (bob@brumfield-haganlaw.com)  
Heather Ijames (heather@brumfield-haganlaw.com)

Desert Breeze MHP, LLC  
Daniel Epstein (epstein14@yahoo.com)

Reesdale Mutual Water Company  
Kurt Stiefler (stieflerlaw@att.net)

Re: *Antelope Valley Groundwater Adjudication*  
Judicial Counsel Coordination Number 4408

Dear Counsel and Unrepresented Parties:

I write on behalf of the stipulating parties to the Proposed Judgment and Physical Solution in the above captioned case. Based on your court statements and/or communications with various stipulating parties, I understand that you wish to discuss settlement possibilities during the May 11, 2015 meet and confer session.

In anticipation of the settlement discussions, the stipulating parties request that you share the information and documents described below prior to Monday's meeting and bring such information with you on Monday. As background, this request is an abridged version of the Court's Phase 4 Discovery Order<sup>1</sup> and will help the stipulating parties understand your claim and facilitate a meaningful settlement discussion.

Please provide the following information and documents for the calendar years of 2000, 2001, 2002, 2003, 2004, 2011 or 2012 ("Time Periods"):

1. The Assessor Parcel Number, Assessor Tax Number, or Assessor's Identification Number of the parcel owned by you in the Antelope Valley Adjudication Area.

<sup>1</sup> The Phase 4 Discovery Order is available online at [http://www.scefiling.org/filingdocs/194/57805/92065\\_2012x12x11xJKxDiscoveryxOrderxforxPhasex4xTrial.pdf](http://www.scefiling.org/filingdocs/194/57805/92065_2012x12x11xJKxDiscoveryxOrderxforxPhasex4xTrial.pdf).



**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

May 7, 2015  
Page 2

2. The record title owner of the parcel referenced in subparagraph 1 from 2000 to present.
3. Whether a groundwater well existed on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
4. Whether a groundwater well was operated on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
5. The amount of groundwater produced from the parcel referenced in subparagraph 1 in any or all of the Time Periods.
6. The use(s) to which groundwater produced from the parcel was put on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
7. The use(s) to which the parcel referenced in subparagraph 1 was put during each of the calendar years 2011 and 2012.
8. The crop type, if any, grown on the parcel and irrigated acreage of such crop type during each of the calendar years during the Time Periods.
9. If you pump groundwater from another parcel for use on the parcel referenced in subparagraph 1 in any or all of the Time Periods, please identify the parcel from where water was pumped.
  - a. State the amount of water rights claimed as the reasonable and beneficial use for such parcel
10. For each parcel referenced in subparagraph 1, please indicate whether the parcel was leased during the Time Periods. If it was leased,
  - a. Provide the name of the lessee
  - b. The parcel's identification number
  - c. Whether the lease allocated credits for groundwater produced by lessee
  - d. Amount of groundwater produced by the lessee and delivered to another parcel and such parcel's identification number
  - e. If known, the use(s) to which groundwater was put to the leased parcel for calendar years 2011 and 2012.



**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

May 7, 2015  
Page 3

11. If you claim groundwater rights based upon something other than groundwater production or use, please state the claim for each of the Time Periods, and your legal and factual basis.
12. Documentations supporting your responses to requests 1 to 11, including but not limited to groundwater extraction notices, well logs, well efficiency test records, leases . . . etc.
13. All other information and documentations that substantiates your claim for water rights.

The stipulating parties request that your response be verified (e.g., provided under oath as true and correct).

Please provide the requested information either by posting them at the Court's website or email to me at [jeffrey.dunn@bbklaw.com](mailto:jeffrey.dunn@bbklaw.com) and copying Wendy Wang at [wendy.wang@bbklaw.com](mailto:wendy.wang@bbklaw.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeffrey V. Dunn', written over a horizontal line.

Jeffrey V. Dunn  
of BEST BEST & KRIEGER LLP

Contrearras Declaration

DECLARATION CONCERNING WATER USE

I, Ulysses Contreas, declare:

I have personal knowledge of the facts set forth in this declaration and I could and would competently testify thereto under oath if called upon to do so. I am providing the following information in response to the Jeffrey Dunn's letter dated May 7, 2015 concerning the Antelope Valley Water Cases. The numbered responses below correspond to the questions set forth in that letter.

1. I am the occupant of the residential property located at:

Address: 44325 N. 88th St. E

APN: 3376-27-20

2. I own/~~lease~~ that property and have since August, 2013

3. No well has existed on this parcel during any of the Time Periods. All of the water used by this parcel is provided through a metered connection from a well owned by the Reesedale Mutual Water District.

4. No

5. None

6. Not applicable

7. Residential use only.

8. None

9. All water is provided to this parcel by the Reesedale Mutual Water Company.

a.

10. See response to numbers 1 and 2.

11. Not applicable


12. Reesedale has the records concerning water usage.

13. I lack personal information to be able to respond further to this question. Please see the declaration submitted on behalf of Reesedale Water District.



I declare the foregoing to be true and correct under penalty of perjury under the laws of the State of California

Dated: 5/9/15

By:   
\_\_\_\_\_  
Ulysses Contreras



**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

Indian Wells  
(760) 568-2611  
Los Angeles  
(213) 617-8100  
Ontario  
(909) 989-8584  
Riverside  
(951) 686-1450

18101 Von Karman Avenue, Suite 1000, Irvine, CA 92612  
Phone: (949) 263-2600 | Fax: (949) 260-0972 | www.bbklaw.com

Sacramento  
(916) 325-4000  
San Diego  
(619) 525-1300  
Walnut Creek  
(925) 977-3300  
Washington, DC  
(202) 785-0600

**Jeffrey V. Dunn**  
(949) 263-2616  
jeffrey.dunn@bbklaw.com  
File No. 26345.00010

May 7, 2015

**VIA POSTING TO THE COURT'S WEBSITE AND E-MAIL**

Rosamond Mobile Home Park  
Robert Coldren (clo@coldrenlawoffices.com)

Milana VII, LLC  
Daniel T. Rudderow (danrudderow@gmail.com)

Eyherabide Land Co.  
Calvin Stead (cstead@bortonpetrini.com)  
Kyle Holmes (kholmes@bortonpetrini.com)

Charles Tapia and Nellie Tapia Family Trust  
Robert H. Brumfield (bob@brumfield-haganlaw.com)  
Heather Ijames (heather@brumfield-haganlaw.com)

Desert Breeze MHP, LLC  
Daniel Epstein (epstein14@yahoo.com)

Reesdale Mutual Water Company  
Kurt Stiefler (stieflerlaw@att.net)

Re: *Antelope Valley Groundwater Adjudication*  
Judicial Counsel Coordination Number 4408

Dear Counsel and Unrepresented Parties:

I write on behalf of the stipulating parties to the Proposed Judgment and Physical Solution in the above captioned case. Based on your court statements and/or communications with various stipulating parties, I understand that you wish to discuss settlement possibilities during the May 11, 2015 meet and confer session.

In anticipation of the settlement discussions, the stipulating parties request that you share the information and documents described below prior to Monday's meeting and bring such information with you on Monday. As background, this request is an abridged version of the Court's Phase 4 Discovery Order<sup>1</sup> and will help the stipulating parties understand your claim and facilitate a meaningful settlement discussion.

Please provide the following information and documents for the calendar years of 2000, 2001, 2002, 2003, 2004, 2011 or 2012 ("Time Periods"):

1. The Assessor Parcel Number, Assessor Tax Number, or Assessor's Identification Number of the parcel owned by you in the Antelope Valley Adjudication Area.

<sup>1</sup> The Phase 4 Discovery Order is available online at [http://www.scefiling.org/filingdocs/194/57805/92065\\_2012x12x11xJKxDiscoveryxOrderxforxPhasex4xTrial.pdf](http://www.scefiling.org/filingdocs/194/57805/92065_2012x12x11xJKxDiscoveryxOrderxforxPhasex4xTrial.pdf).



**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

May 7, 2015  
Page 2

2. The record title owner of the parcel referenced in subparagraph 1 from 2000 to present.
3. Whether a groundwater well existed on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
4. Whether a groundwater well was operated on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
5. The amount of groundwater produced from the parcel referenced in subparagraph 1 in any or all of the Time Periods.
6. The use(s) to which groundwater produced from the parcel was put on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
7. The use(s) to which the parcel referenced in subparagraph 1 was put during each of the calendar years 2011 and 2012.
8. The crop type, if any, grown on the parcel and irrigated acreage of such crop type during each of the calendar years during the Time Periods.
9. If you pump groundwater from another parcel for use on the parcel referenced in subparagraph 1 in any or all of the Time Periods, please identify the parcel from where water was pumped.
  - a. State the amount of water rights claimed as the reasonable and beneficial use for such parcel
10. For each parcel referenced in subparagraph 1, please indicate whether the parcel was leased during the Time Periods. If it was leased,
  - a. Provide the name of the lessee
  - b. The parcel's identification number
  - c. Whether the lease allocated credits for groundwater produced by lessee
  - d. Amount of groundwater produced by the lessee and delivered to another parcel and such parcel's identification number
  - e. If known, the use(s) to which groundwater was put to the leased parcel for calendar years 2011 and 2012.



**BEST BEST & KRIEGER LLP**

**ATTORNEYS AT LAW**

May 7, 2015

Page 3

11. If you claim groundwater rights based upon something other than groundwater production or use, please state the claim for each of the Time Periods, and your legal and factual basis.
12. Documentations supporting your responses to requests 1 to 11, including but not limited to groundwater extraction notices, well logs, well efficiency test records, leases . . . etc.
13. All other information and documentations that substantiates your claim for water rights.

The stipulating parties request that your response be verified (e.g., provided under oath as true and correct).

Please provide the requested information either by posting them at the Court's website or email to me at [jeffrey.dunn@bbklaw.com](mailto:jeffrey.dunn@bbklaw.com) and copying Wendy Wang at [wendy.wang@bbklaw.com](mailto:wendy.wang@bbklaw.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeffrey V. Dunn', written over a light blue horizontal line.

Jeffrey V. Dunn  
of BEST BEST & KRIEGER LLP

Giguere Declaration

DECLARATION CONCERNING WATER USE

I, HENRY GIERE, declare:

I have personal knowledge of the facts set forth in this declaration and I could and would competently testify thereto under oath if called upon to do so. I am providing the following information in response to the Jeffrey Dunn's letter dated May 7, 2015 concerning the Antelope Valley Water Cases. The numbered responses below correspond to the questions set forth in that letter.

1. I am the occupant of the residential property located at:

Address: 8532 E. Lanc. Blvd.

APN: 3376-2-12

2. I ~~own~~/lease that property and have since 2013

3. No well has existed on this parcel during any of the Time Periods. All of the water used by this parcel is provided through a metered connection from a well owned by the Reesedale Mutual Water District.

4. No

5. None

6. Not applicable

7. Residential use only.

8. None

9. All water is provided to this parcel by the Reesedale Mutual Water Company.

a.

10. See response to numbers 1 and 2.

11. Not applicable

12. Reesedale has the records concerning water usage.

13. I lack personal information to be able to respond further to this question. Please see the declaration submitted on behalf of Reesedale Water District.

I declare the foregoing to be true and correct under penalty of perjury under the laws of the State of California

Dated: 5/9/15

By: Henry Alvarez  
HENRY ALVAREZ



**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

Indian Wells  
(760) 568-2611  
Los Angeles  
(213) 617-8100  
Ontario  
(909) 989-8584  
Riverside  
(951) 686-1450

18101 Von Karman Avenue, Suite 1000, Irvine, CA 92612  
Phone: (949) 263-2600 | Fax: (949) 260-0972 | www.bbklaw.com

Sacramento  
(916) 325-4000  
San Diego  
(619) 525-1300  
Walnut Creek  
(925) 977-3300  
Washington, DC  
(202) 785-0600

**Jeffrey V. Dunn**  
(949) 263-2616  
jeffrey.dunn@bbklaw.com  
File No. 26345.00010

May 7, 2015

**VIA POSTING TO THE COURT'S WEBSITE AND E-MAIL**

Rosamond Mobile Home Park  
Robert Coldren (clo@coldrenlawoffices.com)

Milana VII, LLC  
Daniel T. Rudderow (danrudderow@gmail.com)

Eyherabide Land Co.  
Calvin Stead (cstead@bortonpetrini.com)  
Kyle Holmes (kholmes@bortonpetrini.com)

Charles Tapia and Nellie Tapia Family Trust  
Robert H. Brumfield (bob@brumfield-haganlaw.com)  
Heather Ijames (heather@brumfield-haganlaw.com)

Desert Breeze MHP, LLC  
Daniel Epstein (epstein14@yahoo.com)

Reesdale Mutual Water Company  
Kurt Stiefler (stieflerlaw@att.net)

Re: *Antelope Valley Groundwater Adjudication*  
Judicial Counsel Coordination Number 4408

Dear Counsel and Unrepresented Parties:

I write on behalf of the stipulating parties to the Proposed Judgment and Physical Solution in the above captioned case. Based on your court statements and/or communications with various stipulating parties, I understand that you wish to discuss settlement possibilities during the May 11, 2015 meet and confer session.

In anticipation of the settlement discussions, the stipulating parties request that you share the information and documents described below prior to Monday's meeting and bring such information with you on Monday. As background, this request is an abridged version of the Court's Phase 4 Discovery Order<sup>1</sup> and will help the stipulating parties understand your claim and facilitate a meaningful settlement discussion.

Please provide the following information and documents for the calendar years of 2000, 2001, 2002, 2003, 2004, 2011 or 2012 ("Time Periods"):

1. The Assessor Parcel Number, Assessor Tax Number, or Assessor's Identification Number of the parcel owned by you in the Antelope Valley Adjudication Area.

<sup>1</sup> The Phase 4 Discovery Order is available online at [http://www.scefiling.org/filingdocs/194/57805/92065\\_2012x12x11xJKxDiscoveryxOrderxforxPhasex4xTrial.pdf](http://www.scefiling.org/filingdocs/194/57805/92065_2012x12x11xJKxDiscoveryxOrderxforxPhasex4xTrial.pdf).





**BEST BEST & KRIEGER LLP**  
**ATTORNEYS AT LAW**

May 7, 2015  
Page 2

2. The record title owner of the parcel referenced in subparagraph 1 from 2000 to present.
3. Whether a groundwater well existed on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
4. Whether a groundwater well was operated on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
5. The amount of groundwater produced from the parcel referenced in subparagraph 1 in any or all of the Time Periods.
6. The use(s) to which groundwater produced from the parcel was put on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
7. The use(s) to which the parcel referenced in subparagraph 1 was put during each of the calendar years 2011 and 2012.
8. The crop type, if any, grown on the parcel and irrigated acreage of such crop type during each of the calendar years during the Time Periods.
9. If you pump groundwater from another parcel for use on the parcel referenced in subparagraph 1 in any or all of the Time Periods, please identify the parcel from where water was pumped.
  - a. State the amount of water rights claimed as the reasonable and beneficial use for such parcel
10. For each parcel referenced in subparagraph 1, please indicate whether the parcel was leased during the Time Periods. If it was leased,
  - a. Provide the name of the lessee
  - b. The parcel's identification number
  - c. Whether the lease allocated credits for groundwater produced by lessee
  - d. Amount of groundwater produced by the lessee and delivered to another parcel and such parcel's identification number
  - e. If known, the use(s) to which groundwater was put to the leased parcel for calendar years 2011 and 2012.



**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

May 7, 2015  
Page 3

11. If you claim groundwater rights based upon something other than groundwater production or use, please state the claim for each of the Time Periods, and your legal and factual basis.
12. Documentations supporting your responses to requests 1 to 11, including but not limited to groundwater extraction notices, well logs, well efficiency test records, leases . . . etc.
13. All other information and documentations that substantiates your claim for water rights.

The stipulating parties request that your response be verified (e.g., provided under oath as true and correct).

Please provide the requested information either by posting them at the Court's website or email to me at [jeffrey.dunn@bbklaw.com](mailto:jeffrey.dunn@bbklaw.com) and copying Wendy Wang at [wendy.wang@bbklaw.com](mailto:wendy.wang@bbklaw.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeffrey V. Dunn', written over a horizontal line.

Jeffrey V. Dunn  
of BEST BEST & KRIEGER LLP

Alsup Declaration

DECLARATION CONCERNING WATER USE

I, Bonnie Alsop, declare:

I have personal knowledge of the facts set forth in this declaration and I could and would competently testify thereto under oath if called upon to do so. I am providing the following information in response to the Jeffrey Dunn's letter dated May 7, 2015 concerning the Antelope Valley Water Cases. The numbered responses below correspond to the questions set forth in that letter.

1. I am the occupant of the residential property located at:

Address: 8605 E. Ave. J

APN: 3376-5-18

2. I own/~~lease~~ that property and have since approx 2000

3. No well has existed on this parcel during any of the Time Periods. All of the water used by this parcel is provided through a metered connection from a well owned by the Reesedale Mutual Water District.

4. No

5. None

6. Not applicable

7. Residential use only.

8. None

9. All water is provided to this parcel by the Reesedale Mutual Water Company.

a.

10. See response to numbers 1 and 2.

11. Not applicable

12. Reesedale has the records concerning water usage.

13. I lack personal information to be able to respond further to this question. Please see the declaration submitted on behalf of Reesedale Water District.

I declare the foregoing to be true and correct under penalty of perjury under the laws of the State of California

To the best of my knowledge

Dated: 5-9-2015

By: Bonnie R. Alsup

Bonnie R. Alsup

Indian Wells  
(760) 568-2611  
Los Angeles  
(213) 617-8100  
Ontario  
(909) 989-8584  
Riverside  
(951) 686-1450



**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

18101 Von Karman Avenue, Suite 1000, Irvine, CA 92612  
Phone: (949) 263-2600 | Fax: (949) 260-0972 | www.bbklaw.com

Sacramento  
(916) 325-4000  
San Diego  
(619) 525-1300  
Walnut Creek  
(925) 977-3300  
Washington, DC  
(202) 785-0600

**Jeffrey V. Dunn**  
(949) 263-2616  
jeffrey.dunn@bbklaw.com  
File No. 26345.00010

May 7, 2015

**VIA POSTING TO THE COURT'S WEBSITE AND E-MAIL**

Rosamond Mobile Home Park  
Robert Coldren (clo@coldrenlawoffices.com)

Milana VII, LLC  
Daniel T. Rudderow (danrudderow@gmail.com)

Eyherabide Land Co.  
Calvin Stead (cstead@bortonpetrini.com)  
Kyle Holmes (kholmes@bortonpetrini.com)

Charles Tapia and Nellie Tapia Family Trust  
Robert H. Brumfield (bob@brumfield-haganlaw.com)  
Heather Ijames (heather@brumfield-haganlaw.com)

Desert Breeze MHP, LLC  
Daniel Epstein (epstein14@yahoo.com)

Reesdale Mutual Water Company  
Kurt Stiefler (stieflerlaw@att.net)

Re: *Antelope Valley Groundwater Adjudication*  
Judicial Counsel Coordination Number 4408

Dear Counsel and Unrepresented Parties:

I write on behalf of the stipulating parties to the Proposed Judgment and Physical Solution in the above captioned case. Based on your court statements and/or communications with various stipulating parties, I understand that you wish to discuss settlement possibilities during the May 11, 2015 meet and confer session.

In anticipation of the settlement discussions, the stipulating parties request that you share the information and documents described below prior to Monday's meeting and bring such information with you on Monday. As background, this request is an abridged version of the Court's Phase 4 Discovery Order<sup>1</sup> and will help the stipulating parties understand your claim and facilitate a meaningful settlement discussion.

Please provide the following information and documents for the calendar years of 2000, 2001, 2002, 2003, 2004, 2011 or 2012 ("Time Periods"):

1. The Assessor Parcel Number, Assessor Tax Number, or Assessor's Identification Number of the parcel owned by you in the Antelope Valley Adjudication Area.

<sup>1</sup> The Phase 4 Discovery Order is available online at  
[http://www.scefiling.org/filingdocs/194/57805/92065\\_2012x12x11xJKxDiscoveryxOrderxforxPhasex4xTrial.pdf](http://www.scefiling.org/filingdocs/194/57805/92065_2012x12x11xJKxDiscoveryxOrderxforxPhasex4xTrial.pdf).



**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

May 7, 2015  
Page 2

2. The record title owner of the parcel referenced in subparagraph 1 from 2000 to present.
3. Whether a groundwater well existed on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
4. Whether a groundwater well was operated on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
5. The amount of groundwater produced from the parcel referenced in subparagraph 1 in any or all of the Time Periods.
6. The use(s) to which groundwater produced from the parcel was put on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
7. The use(s) to which the parcel referenced in subparagraph 1 was put during each of the calendar years 2011 and 2012.
8. The crop type, if any, grown on the parcel and irrigated acreage of such crop type during each of the calendar years during the Time Periods.
9. If you pump groundwater from another parcel for use on the parcel referenced in subparagraph 1 in any or all of the Time Periods, please identify the parcel from where water was pumped.
  - a. State the amount of water rights claimed as the reasonable and beneficial use for such parcel
10. For each parcel referenced in subparagraph 1, please indicate whether the parcel was leased during the Time Periods. If it was leased,
  - a. Provide the name of the lessee
  - b. The parcel's identification number
  - c. Whether the lease allocated credits for groundwater produced by lessee
  - d. Amount of groundwater produced by the lessee and delivered to another parcel and such parcel's identification number
  - e. If known, the use(s) to which groundwater was put to the leased parcel for calendar years 2011 and 2012.



**BEST BEST & KRIEGER LLP**

**ATTORNEYS AT LAW**

May 7, 2015

Page 3

11. If you claim groundwater rights based upon something other than groundwater production or use, please state the claim for each of the Time Periods, and your legal and factual basis.
12. Documentations supporting your responses to requests 1 to 11, including but not limited to groundwater extraction notices, well logs, well efficiency test records, leases . . . etc.
13. All other information and documentations that substantiates your claim for water rights.

The stipulating parties request that your response be verified (e.g., provided under oath as true and correct).

Please provide the requested information either by posting them at the Court's website or email to me at [jeffrey.dunn@bbklaw.com](mailto:jeffrey.dunn@bbklaw.com) and copying Wendy Wang at [wendy.wang@bbklaw.com](mailto:wendy.wang@bbklaw.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeffrey V. Dunn', written over a horizontal line.

Jeffrey V. Dunn  
of BEST BEST & KRIEGER LLP



Johnson Declaration

DECLARATION CONCERNING WATER USE

I, James Johnson, declare:

I have personal knowledge of the facts set forth in this declaration and I could and would competently testify thereto under oath if called upon to do so. I am providing the following information in response to the Jeffrey Dunn's letter dated May 7, 2015 concerning the Antelope Valley Water Cases. The numbered responses below correspond to the questions set forth in that letter.

1. I am the occupant of the residential property located at:

Address: 44451 N 86th St E

APN: 3376-5-13

2. ~~Own~~/lease that property and have since

2008

3. No well has existed on this parcel during any of the Time Periods. All of the water used by this parcel is provided through a metered connection from a well owned by the Reesedale Mutual Water District.

4. No

5. None

6. Not applicable

7. Residential use only.

8. None

9. All water is provided to this parcel by the Reesedale Mutual Water Company.

a.

10. See response to numbers 1 and 2.

11. Not applicable

12. Reesedale has the records concerning water usage.

13. I lack personal information to be able to respond further to this question. Please see the declaration submitted on behalf of Reesedale Water District.

I declare the foregoing to be true and correct under penalty of perjury under the laws of the State of California

Dated: 5/9/2015

By: James Johnson  
James Johnson

Indian Wells  
(760) 568-2611  
Los Angeles  
(213) 617-8100  
Ontario  
(909) 989-8584  
Riverside  
(951) 686-1450



**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

18101 Von Karman Avenue, Suite 1000, Irvine, CA 92612  
Phone: (949) 263-2600 | Fax: (949) 260-0972 | www.bbklaw.com

Sacramento  
(916) 325-4000  
San Diego  
(619) 525-1300  
Walnut Creek  
(925) 977-3300  
Washington, DC  
(202) 785-0600

**Jeffrey V. Dunn**  
(949) 263-2616  
jeffrey.dunn@bbklaw.com  
File No. 26345.00010

May 7, 2015

**VIA POSTING TO THE COURT'S WEBSITE AND E-MAIL**

Rosamond Mobile Home Park  
Robert Coldren (clo@coldrenlawoffices.com)

Milana VII, LLC  
Daniel T. Rudderow (danrudderow@gmail.com)

Eyherabide Land Co.  
Calvin Stead (cstead@bortonpetrini.com)  
Kyle Holmes (kholmes@bortonpetrini.com)

Charles Tapia and Nellie Tapia Family Trust  
Robert H. Brumfield (bob@brumfield-haganlaw.com)  
Heather Ijames (heather@brumfield-haganlaw.com)

Desert Breeze MHP, LLC  
Daniel Epstein (epstein14@yahoo.com)

Reesdale Mutual Water Company  
Kurt Stiefler (stieflerlaw@att.net)

Re: *Antelope Valley Groundwater Adjudication*  
Judicial Counsel Coordination Number 4408

Dear Counsel and Unrepresented Parties:

I write on behalf of the stipulating parties to the Proposed Judgment and Physical Solution in the above captioned case. Based on your court statements and/or communications with various stipulating parties, I understand that you wish to discuss settlement possibilities during the May 11, 2015 meet and confer session.

In anticipation of the settlement discussions, the stipulating parties request that you share the information and documents described below prior to Monday's meeting and bring such information with you on Monday. As background, this request is an abridged version of the Court's Phase 4 Discovery Order<sup>1</sup> and will help the stipulating parties understand your claim and facilitate a meaningful settlement discussion.

Please provide the following information and documents for the calendar years of 2000, 2001, 2002, 2003, 2004, 2011 or 2012 ("Time Periods"):

1. The Assessor Parcel Number, Assessor Tax Number, or Assessor's Identification Number of the parcel owned by you in the Antelope Valley Adjudication Area.

<sup>1</sup> The Phase 4 Discovery Order is available online at  
[http://www.scefiling.org/filingdocs/194/57805/92065\\_2012x12x11xJKxDiscoveryxOrderxforxPhasex4xTrial.pdf](http://www.scefiling.org/filingdocs/194/57805/92065_2012x12x11xJKxDiscoveryxOrderxforxPhasex4xTrial.pdf).



**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

May 7, 2015  
Page 2

2. The record title owner of the parcel referenced in subparagraph 1 from 2000 to present.
3. Whether a groundwater well existed on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
4. Whether a groundwater well was operated on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
5. The amount of groundwater produced from the parcel referenced in subparagraph 1 in any or all of the Time Periods.
6. The use(s) to which groundwater produced from the parcel was put on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
7. The use(s) to which the parcel referenced in subparagraph 1 was put during each of the calendar years 2011 and 2012.
8. The crop type, if any, grown on the parcel and irrigated acreage of such crop type during each of the calendar years during the Time Periods.
9. If you pump groundwater from another parcel for use on the parcel referenced in subparagraph 1 in any or all of the Time Periods, please identify the parcel from where water was pumped.
  - a. State the amount of water rights claimed as the reasonable and beneficial use for such parcel
10. For each parcel referenced in subparagraph 1, please indicate whether the parcel was leased during the Time Periods. If it was leased,
  - a. Provide the name of the lessee
  - b. The parcel's identification number
  - c. Whether the lease allocated credits for groundwater produced by lessee
  - d. Amount of groundwater produced by the lessee and delivered to another parcel and such parcel's identification number
  - e. If known, the use(s) to which groundwater was put to the leased parcel for calendar years 2011 and 2012.



**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

May 7, 2015  
Page 3

11. If you claim groundwater rights based upon something other than groundwater production or use, please state the claim for each of the Time Periods, and your legal and factual basis.
12. Documentations supporting your responses to requests 1 to 11, including but not limited to groundwater extraction notices, well logs, well efficiency test records, leases . . . etc.
13. All other information and documentations that substantiates your claim for water rights.

The stipulating parties request that your response be verified (e.g., provided under oath as true and correct).

Please provide the requested information either by posting them at the Court's website or email to me at [jeffrey.dunn@bbklaw.com](mailto:jeffrey.dunn@bbklaw.com) and copying Wendy Wang at [wendy.wang@bbklaw.com](mailto:wendy.wang@bbklaw.com).

Sincerely,

Jeffrey V. Dunn  
of BEST BEST & KRIEGER LLP

Anderson Declaration

DECLARATION CONCERNING WATER USE

I, Justin or Joey Anderson, declare:

I have personal knowledge of the facts set forth in this declaration and I could and would competently testify thereto under oath if called upon to do so. I am providing the following information in response to the Jeffrey Dunn's letter dated May 7, 2015 concerning the Antelope Valley Water Cases. The numbered responses below correspond to the questions set forth in that letter.

1. I am the occupant of the residential property located at:

Address: 44434 N 86<sup>th</sup> St E

APN: 3376-005-012

2. I ~~own~~/lease that property and have since

2013

3. No well has existed on this parcel during any of the Time Periods. All of the water used by this parcel is provided through a metered connection from a well owned by the Reesedale Mutual Water District.

4. No

5. None

6. Not applicable

7. Residential use only.

8. None

9. All water is provided to this parcel by the Reesedale Mutual Water Company.

a.

10. See response to numbers 1 and 2.

11. Not applicable

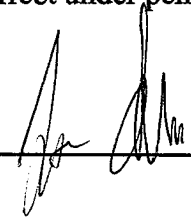
12. Reesedale has the records concerning water usage.

13. I lack personal information to be able to respond further to this question. Please see the declaration submitted on behalf of Reesedale Water District.



I declare the foregoing to be true and correct under penalty of perjury under the laws of the State of California

Dated: 5/10/15

By:  \_\_\_\_\_

JUSTIN ANDERSON.

Indian Wells  
(760) 568-2611  
Los Angeles  
(213) 617-8100  
Ontario  
(909) 989-8584  
Riverside  
(951) 686-1450



**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

18101 Von Karman Avenue, Suite 1000, Irvine, CA 92612  
Phone: (949) 263-2600 | Fax: (949) 260-0972 | www.bbklaw.com

Sacramento  
(916) 325-4000  
San Diego  
(619) 525-1300  
Walnut Creek  
(925) 977-3300  
Washington, DC  
(202) 785-0600

**Jeffrey V. Dunn**  
(949) 263-2616  
jeffrey.dunn@bbklaw.com  
File No. 26345.00010

May 7, 2015

**VIA POSTING TO THE COURT'S WEBSITE AND E-MAIL**

Rosamond Mobile Home Park  
Robert Coldren (clo@coldrenlawoffices.com)

Milana VII, LLC  
Daniel T. Rudderow (danrudderow@gmail.com)

Eyherabide Land Co.  
Calvin Stead (cstead@bortonpetrini.com)  
Kyle Holmes (kholmes@bortonpetrini.com)

Charles Tapia and Nellie Tapia Family Trust  
Robert H. Brumfield (bob@brumfield-haganlaw.com)  
Heather Ijames (heather@brumfield-haganlaw.com)

Desert Breeze MHP, LLC  
Daniel Epstein (epstein14@yahoo.com)

Reesdale Mutual Water Company  
Kurt Stiefler (stieflerlaw@att.net)

Re: *Antelope Valley Groundwater Adjudication*  
Judicial Counsel Coordination Number 4408

Dear Counsel and Unrepresented Parties:

I write on behalf of the stipulating parties to the Proposed Judgment and Physical Solution in the above captioned case. Based on your court statements and/or communications with various stipulating parties, I understand that you wish to discuss settlement possibilities during the May 11, 2015 meet and confer session.

In anticipation of the settlement discussions, the stipulating parties request that you share the information and documents described below prior to Monday's meeting and bring such information with you on Monday. As background, this request is an abridged version of the Court's Phase 4 Discovery Order<sup>1</sup> and will help the stipulating parties understand your claim and facilitate a meaningful settlement discussion.

Please provide the following information and documents for the calendar years of 2000, 2001, 2002, 2003, 2004, 2011 or 2012 ("Time Periods"):

1. The Assessor Parcel Number, Assessor Tax Number, or Assessor's Identification Number of the parcel owned by you in the Antelope Valley Adjudication Area.

<sup>1</sup> The Phase 4 Discovery Order is available online at  
[http://www.scefiling.org/filingdocs/194/57805/92065\\_2012x12x11xJKxDiscoveryxOrderxforxPhasex4xTrial.pdf](http://www.scefiling.org/filingdocs/194/57805/92065_2012x12x11xJKxDiscoveryxOrderxforxPhasex4xTrial.pdf).



**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

May 7, 2015  
Page 2

2. The record title owner of the parcel referenced in subparagraph 1 from 2000 to present.
3. Whether a groundwater well existed on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
4. Whether a groundwater well was operated on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
5. The amount of groundwater produced from the parcel referenced in subparagraph 1 in any or all of the Time Periods.
6. The use(s) to which groundwater produced from the parcel was put on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
7. The use(s) to which the parcel referenced in subparagraph 1 was put during each of the calendar years 2011 and 2012.
8. The crop type, if any, grown on the parcel and irrigated acreage of such crop type during each of the calendar years during the Time Periods.
9. If you pump groundwater from another parcel for use on the parcel referenced in subparagraph 1 in any or all of the Time Periods, please identify the parcel from where water was pumped.
  - a. State the amount of water rights claimed as the reasonable and beneficial use for such parcel
10. For each parcel referenced in subparagraph 1, please indicate whether the parcel was leased during the Time Periods. If it was leased,
  - a. Provide the name of the lessee
  - b. The parcel's identification number
  - c. Whether the lease allocated credits for groundwater produced by lessee
  - d. Amount of groundwater produced by the lessee and delivered to another parcel and such parcel's identification number
  - e. If known, the use(s) to which groundwater was put to the leased parcel for calendar years 2011 and 2012.



**BEST BEST & KRIEGER**

ATTORNEYS AT LAW

May 7, 2015

Page 3

11. If you claim groundwater rights based upon something other than groundwater production or use, please state the claim for each of the Time Periods, and your legal and factual basis.
12. Documentations supporting your responses to requests 1 to 11, including but not limited to groundwater extraction notices, well logs, well efficiency test records, leases . . . etc.
13. All other information and documentations that substantiates your claim for water rights.

The stipulating parties request that your response be verified (e.g., provided under oath as true and correct).

Please provide the requested information either by posting them at the Court's website or email to me at [jeffrey.dunn@bbklaw.com](mailto:jeffrey.dunn@bbklaw.com) and copying Wendy Wang at [wendy.wang@bbklaw.com](mailto:wendy.wang@bbklaw.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeffrey V. Dunn', written over a light blue horizontal line.

Jeffrey V. Dunn  
of BEST BEST & KRIEGER LLP

Balderas Declaration

DECLARATION CONCERNING WATER USE

I, Henry Badleras, declare:

I have personal knowledge of the facts set forth in this declaration and I could and would competently testify thereto under oath if called upon to do so. I am providing the following information in response to the Jeffrey Dunn's letter dated May 7, 2015 concerning the Antelope Valley Water Cases. The numbered responses below correspond to the questions set forth in that letter.

1. I am the occupant of the residential property located at:

Address: 44428 N 85th St E

APN: 3376-5-14

2. I own/~~lease~~ that property and have since 2006

3. No well has existed on this parcel during any of the Time Periods. All of the water used by this parcel is provided through a metered connection from a well owned by the Reesedale Mutual Water District.

4. No

5. None

6. Not applicable

7. Residential use only.

8. None

9. All water is provided to this parcel by the Reesedale Mutual Water Company.

a.

10. See response to numbers 1 and 2.

11. Not applicable

12. Reesedale has the records concerning water usage.

13. I lack personal information to be able to respond further to this question. Please see the declaration submitted on behalf of Reesedale Water District.

- I declare the foregoing to be true and correct under penalty of perjury under the laws of the State of California

Dated: 5/10/15

By: Enrique Balderas B  
ENRIQUE BALDERAS B.

Indian Wells  
(760) 568-2611  
Los Angeles  
(213) 617-8100  
Ontario  
(909) 989-8584  
Riverside  
(951) 686-1450



**BEST BEST & KRIEGER LLP**  
**ATTORNEYS AT LAW**

18101 Von Karman Avenue, Suite 1000, Irvine, CA 92612  
Phone: (949) 263-2600 | Fax: (949) 260-0972 | www.bbklaw.com

Sacramento  
(916) 325-4000  
San Diego  
(619) 525-1300  
Walnut Creek  
(925) 977-3300  
Washington, DC  
(202) 785-0600

**Jeffrey V. Dunn**  
(949) 263-2616  
jeffrey.dunn@bbklaw.com  
File No. 26345.00010

May 7, 2015

**VIA POSTING TO THE COURT'S WEBSITE AND E-MAIL**

Rosamond Mobile Home Park  
Robert Coldren (clo@coldrenlawoffices.com)

Milana VII, LLC  
Daniel T. Rudderow (danrudderow@gmail.com)

Eyherabide Land Co.  
Calvin Stead (cstead@bortonpetrini.com)  
Kyle Holmes (kholmes@bortonpetrini.com)

Charles Tapia and Nellie Tapia Family Trust  
Robert H. Brumfield (bob@brumfield-haganlaw.com)  
Heather Ijames (heather@brumfield-haganlaw.com)

Desert Breeze MHP, LLC  
Daniel Epstein (epstein14@yahoo.com)

Reesdale Mutual Water Company  
Kurt Stiefler (stieflerlaw@att.net)

Re: *Antelope Valley Groundwater Adjudication*  
Judicial Counsel Coordination Number 4408

Dear Counsel and Unrepresented Parties:

I write on behalf of the stipulating parties to the Proposed Judgment and Physical Solution in the above captioned case. Based on your court statements and/or communications with various stipulating parties, I understand that you wish to discuss settlement possibilities during the May 11, 2015 meet and confer session.

In anticipation of the settlement discussions, the stipulating parties request that you share the information and documents described below prior to Monday's meeting and bring such information with you on Monday. As background, this request is an abridged version of the Court's Phase 4 Discovery Order<sup>1</sup> and will help the stipulating parties understand your claim and facilitate a meaningful settlement discussion.

Please provide the following information and documents for the calendar years of 2000, 2001, 2002, 2003, 2004, 2011 or 2012 ("Time Periods"):

1. The Assessor Parcel Number, Assessor Tax Number, or Assessor's Identification Number of the parcel owned by you in the Antelope Valley Adjudication Area.

<sup>1</sup> The Phase 4 Discovery Order is available online at [http://www.scefiling.org/filingdocs/194/57805/92065\\_2012x12x11xJKxDiscoveryxOrderxforxPhasex4xTrial.pdf](http://www.scefiling.org/filingdocs/194/57805/92065_2012x12x11xJKxDiscoveryxOrderxforxPhasex4xTrial.pdf).





**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

May 7, 2015  
Page 2

2. The record title owner of the parcel referenced in subparagraph 1 from 2000 to present.
3. Whether a groundwater well existed on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
4. Whether a groundwater well was operated on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
5. The amount of groundwater produced from the parcel referenced in subparagraph 1 in any or all of the Time Periods.
6. The use(s) to which groundwater produced from the parcel was put on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
7. The use(s) to which the parcel referenced in subparagraph 1 was put during each of the calendar years 2011 and 2012.
8. The crop type, if any, grown on the parcel and irrigated acreage of such crop type during each of the calendar years during the Time Periods.
9. If you pump groundwater from another parcel for use on the parcel referenced in subparagraph 1 in any or all of the Time Periods, please identify the parcel from where water was pumped.
  - a. State the amount of water rights claimed as the reasonable and beneficial use for such parcel
10. For each parcel referenced in subparagraph 1, please indicate whether the parcel was leased during the Time Periods. If it was leased,
  - a. Provide the name of the lessee
  - b. The parcel's identification number
  - c. Whether the lease allocated credits for groundwater produced by lessee
  - d. Amount of groundwater produced by the lessee and delivered to another parcel and such parcel's identification number
  - e. If known, the use(s) to which groundwater was put to the leased parcel for calendar years 2011 and 2012.



**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

May 7, 2015  
Page 3

11. If you claim groundwater rights based upon something other than groundwater production or use, please state the claim for each of the Time Periods, and your legal and factual basis.
12. Documentations supporting your responses to requests 1 to 11, including but not limited to groundwater extraction notices, well logs, well efficiency test records, leases . . . etc.
13. All other information and documentations that substantiates your claim for water rights.

The stipulating parties request that your response be verified (e.g., provided under oath as true and correct).

Please provide the requested information either by posting them at the Court's website or email to me at [jeffrey.dunn@bbklaw.com](mailto:jeffrey.dunn@bbklaw.com) and copying Wendy Wang at [wendy.wang@bbklaw.com](mailto:wendy.wang@bbklaw.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeffrey V. Dunn', written over a horizontal line.

Jeffrey V. Dunn  
of BEST BEST & KRIEGER LLP

Pendley Declaration

DECLARATION CONCERNING WATER USE

I, Christine Pendley, declare:

I have personal knowledge of the facts set forth in this declaration and I could and would competently testify thereto under oath if called upon to do so. I am providing the following information in response to the Jeffrey Dunn's letter dated May 7, 2015 concerning the Antelope Valley Water Cases. The numbered responses below correspond to the questions set forth in that letter.

1. I am the occupant of the residential property located at:

Address: 44545 N 86<sup>th</sup> St E

APN: 3376-5-3

2. I own/~~lease~~ that property and have since APRIL 2006

3. No well has existed on this parcel during any of the Time Periods. All of the water used by this parcel is provided through a metered connection from a well owned by the Reesedale Mutual Water District.

4. No

5. None

6. Not applicable

7. Residential use only.

8. None

9. All water is provided to this parcel by the Reesedale Mutual Water Company.

a.

10. See response to numbers 1 and 2.

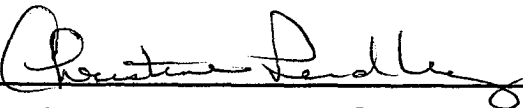
11. Not applicable

12. Reesedale has the records concerning water usage.

13. I lack personal information to be able to respond further to this question. Please see the declaration submitted on behalf of Reesedale Water District.

I declare the foregoing to be true and correct under penalty of perjury under the laws of the State of California

Dated: 5-9-2015

By:   
CHRISTINE PENDLEY



**BEST BEST & KRIEGER LLP**  
**ATTORNEYS AT LAW**

Indian Wells  
(760) 568-2611  
Los Angeles  
(213) 617-8100  
Ontario  
(909) 989-8584  
Riverside  
(951) 686-1450

18101 Von Karman Avenue, Suite 1000, Irvine, CA 92612  
Phone: (949) 263-2600 | Fax: (949) 260-0972 | www.bbklaw.com

Sacramento  
(916) 325-4000  
San Diego  
(619) 525-1300  
Walnut Creek  
(925) 977-3300  
Washington, DC  
(202) 785-0600

**Jeffrey V. Dunn**  
(949) 263-2616  
jeffrey.dunn@bbklaw.com  
File No. 26345.00010

May 7, 2015

**VIA POSTING TO THE COURT'S WEBSITE AND E-MAIL**

Rosamond Mobile Home Park  
Robert Coldren (clo@coldrenlawoffices.com)

Milana VII, LLC  
Daniel T. Rudderow (danrudderow@gmail.com)

Eyherabide Land Co.  
Calvin Stead (cstead@bortonpetrini.com)  
Kyle Holmes (kholmes@bortonpetrini.com)

Charles Tapia and Nellie Tapia Family Trust  
Robert H. Brumfield (bob@brumfield-haganlaw.com)  
Heather Ijames (heather@brumfield-haganlaw.com)

Desert Breeze MHP, LLC  
Daniel Epstein (epstein14@yahoo.com)

Reesdale Mutual Water Company  
Kurt Stiefler (stieflerlaw@att.net)

Re: *Antelope Valley Groundwater Adjudication*  
Judicial Counsel Coordination Number 4408

Dear Counsel and Unrepresented Parties:

I write on behalf of the stipulating parties to the Proposed Judgment and Physical Solution in the above captioned case. Based on your court statements and/or communications with various stipulating parties, I understand that you wish to discuss settlement possibilities during the May 11, 2015 meet and confer session.

In anticipation of the settlement discussions, the stipulating parties request that you share the information and documents described below prior to Monday's meeting and bring such information with you on Monday. As background, this request is an abridged version of the Court's Phase 4 Discovery Order<sup>1</sup> and will help the stipulating parties understand your claim and facilitate a meaningful settlement discussion.

Please provide the following information and documents for the calendar years of 2000, 2001, 2002, 2003, 2004, 2011 or 2012 ("Time Periods"):

1. The Assessor Parcel Number, Assessor Tax Number, or Assessor's Identification Number of the parcel owned by you in the Antelope Valley Adjudication Area.

<sup>1</sup> The Phase 4 Discovery Order is available online at [http://www.scefiling.org/filingdocs/194/57805/92065\\_2012x12x11xJKxDiscoveryxOrderxforxPhasex4xTrial.pdf](http://www.scefiling.org/filingdocs/194/57805/92065_2012x12x11xJKxDiscoveryxOrderxforxPhasex4xTrial.pdf).



**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

May 7, 2015  
Page 2

2. The record title owner of the parcel referenced in subparagraph 1 from 2000 to present.
3. Whether a groundwater well existed on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
4. Whether a groundwater well was operated on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
5. The amount of groundwater produced from the parcel referenced in subparagraph 1 in any or all of the Time Periods.
6. The use(s) to which groundwater produced from the parcel was put on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
7. The use(s) to which the parcel referenced in subparagraph 1 was put during each of the calendar years 2011 and 2012.
8. The crop type, if any, grown on the parcel and irrigated acreage of such crop type during each of the calendar years during the Time Periods.
9. If you pump groundwater from another parcel for use on the parcel referenced in subparagraph 1 in any or all of the Time Periods, please identify the parcel from where water was pumped.
  - a. State the amount of water rights claimed as the reasonable and beneficial use for such parcel
10. For each parcel referenced in subparagraph 1, please indicate whether the parcel was leased during the Time Periods. If it was leased,
  - a. Provide the name of the lessee
  - b. The parcel's identification number
  - c. Whether the lease allocated credits for groundwater produced by lessee
  - d. Amount of groundwater produced by the lessee and delivered to another parcel and such parcel's identification number
  - e. If known, the use(s) to which groundwater was put to the leased parcel for calendar years 2011 and 2012.



**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

May 7, 2015  
Page 3

11. If you claim groundwater rights based upon something other than groundwater production or use, please state the claim for each of the Time Periods, and your legal and factual basis.
12. Documentations supporting your responses to requests 1 to 11, including but not limited to groundwater extraction notices, well logs, well efficiency test records, leases . . . etc.
13. All other information and documentations that substantiates your claim for water rights.

The stipulating parties request that your response be verified (e.g., provided under oath as true and correct).

Please provide the requested information either by posting them at the Court's website or email to me at [jeffrey.dunn@bbklaw.com](mailto:jeffrey.dunn@bbklaw.com) and copying Wendy Wang at [wendy.wang@bbklaw.com](mailto:wendy.wang@bbklaw.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeffrey V. Dunn', written over a horizontal line.

Jeffrey V. Dunn  
of BEST BEST & KRIEGER LLP



Supplemental Parker Declaration

1 Kurt A. Stiefler, SBN 103249  
4422 Mammoth Av.  
2 Sherman Oaks CA 91423  
(818) 616-1050

3 Counsel for Reesedale Mutual Water Company  
4

5  
6

7

8

SUPERIOR COURT OF CALIFORNIA

9

COUNTY OF LOS ANGELES

10

11 ANTELOPE VALLEY  
GROUNDWATER CASES

Judicial Council Coordination No. 4408

12

Included actions:

For Filing Purposes Only:

13

Los Angeles County Waterworks District  
No.40 v. Diamond Farming Co.

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

14

Los Angeles County Superior Court  
Case No. BC 325201

Assigned to: Honorable Jack Komar

15

Los Angeles County Waterworks District  
No.40 v. Diamond Farming Co.

SUPPLEMENTAL DECLARATION OF  
PATRICIA PARKER IN SUPPORT OF  
RESEDALE MUTUAL WATER  
COMPANY'S REQUEST TO BE  
INCLUDED IN STIPULATED  
SETTLEMENT AGREEMENT

16

Kern County Superior Court  
Case No. S-1500-CV-254-348

17

18

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

20

Riverside County Superior Court  
Consolidated actions

21

Case Nos. RIC 353 840, RIC 344 436, RIC  
344 668

22

23

24

I, Patricia Parker, declare:

25

1. I have personal knowledge of the facts set forth in this declaration, unless

26

otherwise stated, and I could and would competently testify thereto in court under oath if

27

called upon to do so. I am providing this supplemental declaration in support of

28

Reesedale's joinder in the settlement of this matter.

1 2. I have attached to this declaration a true and correct copy of the deed reflecting  
2 Reesedale's ownership of the land on which its well is located. I have a certified copy of  
3 that deed which will be presented at trial if necessary. I pay annually the property taxes  
4 on both the real property and the wells and other related improvements on that property.  
5 3. Reesedale is a California corporation in good standing and I pay, every year, the  
6 corporate taxes and fees required to maintain Reesedale's standing as a corporation.  
7 4. Reesedale does not provide water to anyone other than those persons owning land  
8 serviced by Reesedale and it does not sell water to anyone other than those persons whose  
9 lots are serviced by Reesedale. In short, Reesedale water is provided solely for the  
10 residential use of its landowners.

11 I declare the foregoing to be true and correct under penalty of perjury under the  
12 laws of the State of California. This declaration was executed in Los Angeles County,  
13 CA.

14  
15 Dated: 6/29/15

16 By:   
Patricia Parker, Secretary-Treasurer of Reesedale  
Mutual Water Company

17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

BOOK 49297 PAGE 326

PLACE INTERNAL REVENUE STAMPS IN THIS SPACE

# Grant Deed

Affix I. R. S. \$..... nil.....

398 10-54

THIS FORM FURNISHED BY TITLE INSURANCE AND TRUST COMPANY

FOR A VALUABLE CONSIDERATION, receipt of which is hereby acknowledged,

ODIE B. REESE, a widow who acquire title as Oddie B. Reese, A widow hereby GRANT(S) to REESEDALE MUTUAL WATER CO., a corporation

the following described real property in the state of California, county of Los Angeles

The Southerly 100 feet of the Easterly 100 feet of Parcel 31 as shown on Record of Survey filed in Book 72, Pages 37 and 38 of Record of Survey in the office of the County Recorder of said County.

SUBJECT TO; General and Special taxes for the fiscal year of 1955-1956.

Covenants, conditions, restrictions, reservation rights, rights of way and easements of record.

Dated: October 10, 1955.

STATE OF CALIFORNIA  
COUNTY OF

Los Angeles

SS.

*Oddie B. Reese*

On October 10, 1955 before me, the undersigned, a Notary Public in and for said County and State, personally appeared Odie B. Reese

known to me to be the person whose name is subscribed to the within instrument and acknowledged that she executed the same.

WITNESS my hand and official seal.

(Seal)

*[Signature]*  
Notary Public in and for said County and State.

SPACE BELOW FOR RECORDER'S USE ONLY

DOCUMENT No. 1644  
RECORDED AT REQUEST OF  
TITLE INSURANCE & TRUST CO.

OCT 21 1955 AT 8 A. M.