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

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12 LOS ANGELES COUNTY WATERWORKS DISTRICT NO. 40

13 SUPERIOR COURT OF THE STATE OF CALIFORNIA

14 COUNTY OF LOS ANGELES – CENTRAL DISTRICT

15 ANTELOPE VALLEY GROUNDWATER
CASES

Included Actions:

16 *Los Angeles County Waterworks District No. 40 v.*
17 *Diamond Farming Co.*, Superior Court of
California, County of Los Angeles, Case No. BC
325201;

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

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

24 *Rebecca Lee Willis v. Los Angeles County*
Waterworks District No. 40, et al., Superior Court
of California, County of Los Angeles, Case No.
25 BC364533

26 *Richard Wood v. Los Angeles County Waterworks*
District No. 40, et al., Superior Court of
California, County of Los Angeles, Case No.
27 BC391869

Judicial Council Coordination
Proceeding No. 4408

CLASS ACTION

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

**DECLARATION OF TIMOTHY T.
COATES IN SUPPORT OF
DISTRICT NO. 40'S EX PARTE
APPLICATION**

*[Filed Concurrently with Notice and Ex
Parte Application; Declarations of
Jeffrey V. Dunn and Warren Wellen;
and [Proposed] Order]*

Date: September 22, 2016
Time: 9:00 a.m.
Dept.: Via CourtCall

DECLARATION OF TIMOTHY T. COATES

I, Timothy T. Coates, declare as follows:

1. I have personal knowledge of the facts stated herein and, if called upon to do so, I could testify to these facts.

2. I am an attorney licensed to practice law in the State of California. I am the managing partner at Greines, Martin, Stein & Richland LLP. The firm devotes its practice exclusively to appellate and law and motion practice in the state and federal courts.

3. On September 12, 2016, I was retained by Los Angeles County Waterworks District No. 40 (“District No. 40”) to prepare its opposition to Antelope Valley-East Kern Water Agency’s (“AVEK”) motion to disqualify District No. 40’s long-time counsel of record, Best Best & Krieger LLP (“Motion”).

4. On September 13, 2016, I informed Warren Wellen, counsel for District No. 40 that I have various pre-existing deadlines that would impair my ability to prepare the opposition papers within the present briefing schedule, including oral arguments before the California Supreme Court and the Ninth Circuit Court of Appeals which in and of themselves will require several weeks of preparation.

5. Below is a list of filing deadlines and hearings that require my full attention from now until October 18, 2016:

(a) September 23, 2016, trial brief, *Louis J. Jean-Louis v. Al Zelinka et al*, USDC Case No. 13-cv-01059-AG-AS

(b) September 26, 2016, opposition to petition for writ of mandate to pay judgment, *Jones v. Upland Housing Authority*, USDC Case No 12-cv-02074 VAP

(c) September 26, 2016, answer to petition for review, *Santa Clarita Organization for Planning and the Environment v. Castaic Lake Water Agency*, Supreme Court case No. S237031

(d) September 30, 2016, supplemental letter brief regarding new authorities, *NRDC v. Los Angeles County Flood Control Dist.*, Ninth Cir. Case No. 15-55562

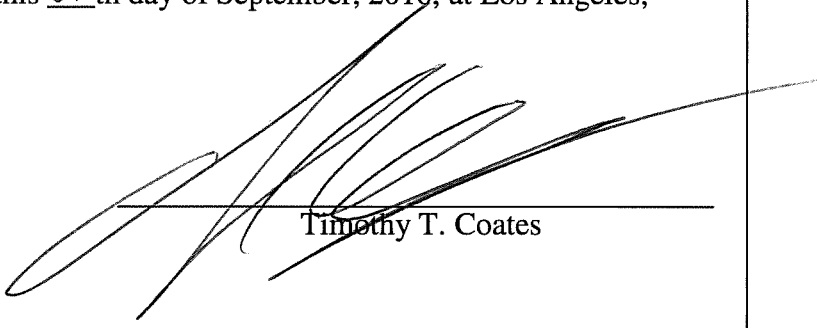
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(e) October 3, 2016, respondents' brief, *Williams v. Metropolitan Water District*, 4th Civ. No. G053002

(f) October 6, 2016, oral argument, California Supreme Court (San Francisco), *County of Los Angeles Board of Supervisors v. Superior Court (ACLU)*, Case No. S22664

(g) October 12, 2016, oral argument, Ninth Circuit (Pasadena), *NRDC v. Los Angeles County Flood Control District*, Ninth Cir. Case No. 15-55562.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 21th day of September, 2016, at Los Angeles, California.



Timothy T. Coates

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PROOF OF SERVICE

I, Rosanna R. Pérez, declare:

I am a resident of the State of California and over the age of eighteen years, and not a party to the within action; my business address is Best Best & Krieger LLP, 300 S. Grand Avenue, 25th Floor, Los Angeles, California 90071. On September 21, 2016, I served the following document(s):

DECLARATION OF TIMOTHY T. COATES IN SUPPORT OF DISTRICT NO. 40'S EX PARTE APPLICATION

BY ELECTRONIC TRANSMISSION. I caused such document(s) to be electronically served, via One Legal, to all parties appearing on the electronic service list for the Antelope Valley Groundwater Cases; proof of electronic-filing through One Legal is then printed and maintained with the original documents in our office. Electronic service is complete at the time of transmission. My electronic notification email address is Rosanna.perez@bbklaw.com.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on September 21, 2016, at Los Angeles, California.



Rosanna R. Pérez