

1 *[INSERT NAME OF PARTY OR ATTORNEY]*

2 *[Insert address, phone number,*  
3 *fax number, and e-mail address]*

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5  
6  
7  
8 SUPERIOR COURT OF CALIFORNIA  
9 COUNTY OF LOS ANGELES

10	<b>ANTELOPE VALLEY</b>	)	Judicial Council Coordination Proceeding No.
11	<b>GROUNDWATER CASES</b>	)	4408
12	Included Actions:	)	For filing purposes only:
13	Los Angeles County Waterworks District No. 40	)	Santa Clara County Case No. 1-05-CV-049053
14	v. Diamond Farming Co.	)	
15	Los Angeles County Superior Court	)	Assigned to The Honorable Jack Komar
16	Case No. BC 325 201	)	
17	Los Angeles County Waterworks District No. 40	)	<b>ANSWER TO ALL CROSS-COMPLAINTS</b>
18	v. Diamond Farming Co.	)	
19	Kern County Superior Court	)	
20	Case No. S-1500-CV-254-348	)	
21	Wm. Bolthouse Farms, Inc. v. City of Lancaster	)	
22	Diamond Farming Co. v. City of Lancaster	)	
23	Diamond Farming Co. v. Palmdale Water Dist.	)	
24	Riverside County Superior Court	)	
25	Consolidated actions, Case Nos.	)	
26	RIC 353 840, RIC 344 436, RIC 344 668	)	

27 I hereby answer the cross-complaint of Los Angeles County Waterworks No. 40 and all  
28 other cross-complaints against this cross-defendant filed in the Antelope Valley Groundwater Cases.  
I will not participate at trial or other proceedings unless ordered by the Court to do so. I own the  
following property(ies) located in the Antelope Valley: *[Insert address and/or APN Number below]*

1 **GENERAL DENIAL**

2 1. Pursuant to Code of Civil Procedure §§ 431.30(d), cross-defendant hereby  
3 generally denies each and every allegation set forth in the Cross-Complaint, and the whole thereof, and  
4 further denies that cross-complainant is entitled to any relief against cross-defendant.

5 **AFFIRMATIVE DEFENSES**

6 **First Affirmative Defense**

7 (Failure to State a Cause of Action)

8 2. The Cross-Complaint and every purported cause of action contained therein fail to  
9 allege facts sufficient to constitute a cause of action against cross-defendant.

10 **Second Affirmative Defense**

11 (Statutes of Limitation)

12 3. Each and every cause of action contained in the Cross-Complaint is barred, in  
13 whole or in part, by the applicable statutes of limitation, including, but not limited to, sections 318, 319,  
14 321, 338, and 343 of the California Code of Civil Procedure.

15 **Third Affirmative Defense**

16 (Laches)

17 4. The Cross-Complaint, and each and every cause of action contained therein, is  
18 barred by the doctrine of laches.

19 **Fourth Affirmative Defense**

20 (Estoppel)

21 5. The Cross-Complaint, and each and every cause of action contained therein, is  
22 barred by the doctrine of estoppel.

23 **Fifth Affirmative Defense**

24 (Waiver)

25 6. The Cross-Complaint, and each and every cause of action contained therein, is  
26 barred by the doctrine of waiver.

27 **Sixth Affirmative Defense**

28 (Self-Help)

