[INSERT NAME OF PARTY OR ATTORNEY]	
[Insert address, phone number,	
fax number, and e-mail address]	
	RT OF CALIFORNIA
COUNTY OF	LOS ANGELES
ANTELOPE VALLEY GROUNDWATER CASES) Judicial Council Coordination Proceeding No.) 4408
Included Actions:)) For filing purposes only:
Los Angeles County Waterworks District No. 40) Santa Clara County Case No. 1-05-CV-049053
v. Diamond Farming Co. Los Angeles County Superior Court) Assigned to The Honorable Jack Komar
Case No. BC 325 201)
Los Angeles County Waterworks District No. 40 v. Diamond Farming Co.	ANSWER TO ALL CROSS-COMPLAINTS
Kern County Superior Court Case No. S-1500-CV-254-348))
)
Wm. Bolthouse Farms, Inc. v. City of Lancaster Diamond Farming Co. v. City of Lancaster)
Diamond Farming Co. v. Palmdale Water Dist. Riverside County Superior Court)
Consolidated actions, Case Nos. RIC 353 840, RIC 344 436, RIC 344 668))
I hereby answer the cross-complaint	t of Los Angeles County Waterworks No. 40 and al
other cross-complaints against this cross-defendant	filed in the Antelope Valley Groundwater Cases.
I will not participate at trial or other proceedings up	nless ordered by the Court to do so. I own the
following property(ies) located in the Antelope Val	lley: [Insert address and/or APN Number below

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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)
	Antelope Valley Groundwater Cases (JCCP 4408) ANSWER TO ALL CROSS-COMPLAINTS (MODEL APPROVED BY THE COURT)

1	7. Cross-Defendant has, by virtue of the doctrine of self-help, preserved its
2	paramount overlying right to extract groundwater by continuing, during all times relevant hereto, to
3	extract groundwater and put it to reasonable and beneficial use on its property.
4	Seventh Affirmative Defense
5	(California Constitution Article X, Section 2)
6	8. Cross-complainant's methods of water use and storage are unreasonable and
7	wasteful in the arid conditions of the Antelope Valley and thereby violate Article X, Section 2 of the
8	California Constitution.
9	Eighth Affirmative Defense
10	(Additional Defenses)
11	9. The Cross-Complaint does not state its allegations with sufficient clarity to enable
12	cross-defendant to determine what additional defenses may exist to cross-complainant's causes of
13	action. Cross-defendant therefore reserves the right to assert all other defenses which may pertain to the
14	Cross-Complaint.
15	
16	WHEREFORE, Cross-defendant prays that judgment be entered as follows:
17	1. That cross-complainant take nothing by reason of its Cross-Complaint;
18	2. That the Cross-Complaint be dismissed with prejudice;
19	3. For cross-defendant's costs incurred herein; and
20	4. For such other and further relief as the Court deems just and proper.
21	
22	Dated:, 2006 Signature:
23	
24	[Print name of party and/or attorney]
25	
26	[FILE IN LA SUPERIOR COURT AND POST ON COURT WEBSITE FOR E-FILING
27	INSTRUCTIONS, PLEASE GO TO <u>WWW.SCEFILING.ORG/FAQ</u> OR CONTACT GLOTRANS AT
28	(510) 208-4775.]
	Antolono Vollor: Cross Anoton Cosos (LCCD 4409)
	Antelope Valley Groundwater Cases (JCCP 4408) ANSWER TO ALL CROSS-COMPLAINTS (MODEL APPROVED BY THE COURT)