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136), Paula E. Ritter (Doe 137), Paula e. Ritter as Trustee of the Ritter Family Trust (Doe
9 138), **collectively known as the Antelope Valley Ground Water Agreement Association**
10 **(“AGWA”)**

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **FOR THE COUNTY OF SANTA CLARA**

13
14 **ANTELOPE VALLEY**
GROUNDWATER CASES

15 Included Actions

16 Los Angeles County Waterworks District
17 No. 40 v. Diamond Farming Co. Superior
Court of California County of Los Angeles,
18 Case No. BC 325 201 Los Angeles County
Waterworks District No. 40 v. Diamond
19 Farming Co. Superior Court of California,
County of Kern, Case No. S-1500-CV-254-
20 348Wm. Bolthouse Farms, Inc. v. City of
Lancaster Diamond Farming Co. v. City of
21 Lancaster Diamond Farming Co. v.
Palmdale Water District. Superior Court of
22 California, County of Riverside,
consolidated actions, Case Nos. RIC 353
23 840, RIC 344 436, RIC 344 668

Judicial Council Coordination Proceeding No.
4408

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

**OBJECTION TO TEJON RANCHCORP CASE
MANAGEMENT CONFERENCE PROPOSAL**

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25 The Antelope Valley Groundwater Agreement Association (“AGWA”) hereby objects to the
26 form and content of the so called “Joint Purveyor and Landowner Case Management Proposal” filed
27 by Tejon Ranchcorp and a small group of other parties on Friday, February 10, 2006.

28 Given the small number of parties that have agreed to this proposal by Tejon Ranchcorp,

1 AGWA believes it is inappropriate to title the proposal as a joint proposal by the purveyors and the
2 landowners.

3 Regarding the substance of the proposal, AGWA objects to linking the outer basin boundary
4 issue to the issue of subbasins, as the proposal suggests.

5 AGWA agrees that it is imperative that the outer basin boundary be established as soon as
6 possible. The outer basin boundary determines who will be a party to the litigation and due process
7 therefore demands that the outer basin boundary be established at the earliest possible date.

8 The question of subbasins, on the other hand, does not share this same urgency. The
9 question of subbasins is also of potentially greater difficulty because it involves issues of
10 differential management of the basin. This may have a policy as well as hydrogeologic dimension.


11 AGWA does not object to a speedy resolution of the subbasin question, but believes it
12 would be a mistake to link this issue to the outer basin boundary issue.

13 AGWA does join in part two of the Tejon Ranchcorp proposal. We believe that the Court
14 should mandate the immediate re-initiation of settlement discussions.

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Dated: February 14, 2006

HATCH & PARENT

By: 
MICHAEL T. FIFE
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