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8 **Attorneys for:** Gene T. Bahlman, William and Julie Barnes, William R. Barnes & Eldora M. Barnes  
9 Family Trust of 1989, Thomas M. Bookman, B.J. Calandri, John Calandri, John Calandri as Trustee  
10 of the John and B.J. Calandri 2001 Trust, Son Rise Farms, Calmat Land Company, Sal and Connie  
11 L. Cardile, Efren and Luz Chavez, Consolidated Rock Products, Del Sur Ranch LLC, Steven Godde  
12 as Trustee of the Forrest G. Godde Trust, Lawrence A. Godde, Lawrence A. Godde and Godde  
13 Trust, Robert and Phillip Gorrindo, Gorrindo Family Trust, Laura Griffin, Healy Farms, Healy  
14 Enterprises, Inc., Habod Javadi, Juniper Hills Water Group, Eugene V., Beverly A., & Paul S.  
15 Kindig, Paul S. & Sharon R. Kindig, Kootenai Properties, Inc., Gailen Kyle, Gailen Kyle as Trustee  
16 of the Kyle Trust, James W. Kyle, James W. Kyle as Trustee of the Kyle Family Trust, Julia Kyle,  
17 Wanda E. Kyle, Maritorena Living Trust, Jose and Marie Maritorena, Richard H. Miner, Barry S.  
18 Munz, Terry A. Munz and Kathleen M. Munz, Eugene B. Nebeker, R and M Ranch, Inc., Richard  
19 and Michael Nelson, Robert Jones, John and Adrienne Reca, Edgar C. Ritter, Paula E. Ritter, Paula  
20 E. Ritter as Trustee of the Ritter Family Trust, Sahara Nursery, Mabel Selak, Jeffrey L. & Nancee J.  
21 Siebert, Dr. Samuel Kremen, Tierra Bonita Ranch Company, Beverly Tobias, Triple M Property  
22 FKA and 3M Property Investment Co., Vulcan Materials Co. and Vulcan Lands Inc., Willow  
23 Springs Company, Donna and Nina Wilson, Ramin Zomorodi, Genz Development and Castle Ranch  
24 Estate, **collectively known as the Antelope Valley Ground Water Agreement Association**  
25 **(“AGWA”)**

16 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

17 **FOR THE COUNTY OF LOS ANGELES**

18 **ANTELOPE VALLEY** )  
19 **GROUNDWATER CASES** ) Judicial Council Coordination Proceeding  
20 ) No. 4408

21 Included Actions: )  
22 ) **Santa Clara Case No. 1-05-CV-049053**  
23 ) Assigned to The Honorable Jack Komar

24 Los Angeles County Waterworks District No. )  
25 40 v. Diamond Farming Co. Superior Court of )  
26 California County of Los Angeles, Case No. BC )  
27 325 201 Los Angeles County Waterworks )  
28 District No. 40 v. Diamond Farming Co. )  
29 Superior Court of California, County of Kern, )  
30 Case No. S-1500-CV-254-348 Wm. Bolthouse )  
31 Farms, Inc. v. City of Lancaster Diamond )  
32 Farming Co. v. City of Lancaster Diamond )  
33 Farming Co. v. Palmdale Water Dist. Superior )  
34 Court of California, County of Riverside, )  
35 consolidated actions, Case No. RIC 353 840, )  
36 RIC 344 436, RIC 344 668 )

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1 I, Michael T. Fife, hereby declare as follows:

2 1. I am an attorney duly admitted to practice before all Courts of the State of  
3 California, and am an attorney of record for Cross-Complainants the Antelope Valley  
4 Groundwater Agreement Association (“AGWA”)in this action. The following facts are within  
5 my personal knowledge, and if called upon, I could and would competently testify to those facts.

6 2. On November 10, 2011, Quartz Hill Water District served on the landowner  
7 parties in this action its Special Interrogatories (Set One), Request for Production of Documents  
8 (Set One), Request for Admissions (Set One), and Form Interrogatories (Set One). On  
9 September 12, 2012, AGWA members were added as parties required to respond. Quartz Hill  
10 served its Request for Admissions (Set Two) and Form Interrogatories (Set Two), on November  
11 11, 2011. Collectively, the propounded discovery will hereafter be referred as the “Discovery  
12 Requests.”

13 3. Attached hereto as Exhibit A is a true and correct copy of Quartz Hill Water  
14 District’s Special Interrogatories, Set One.

15 4. Attached hereto as Exhibit B is a true and correct copy of Quartz Hill Water  
16 District’s Request for Production of Documents, Set One.

17 5. Attached hereto as Exhibit C is a true and correct copy of Quartz Hill Water  
18 District’s Request for Admissions, Set One.

19 6. Attached hereto as Exhibit D is a true and correct copy of Quartz Hill Water  
20 District’s Form Interrogatories, Set One.

21 7. Attached hereto as Exhibit E is a true and correct copy of Quartz Hill Water  
22 District’s Request for Admissions, Set Two.

23 8. Attached hereto as Exhibit F is a true and correct copy of Quartz Hill Water  
24 District’s Form Interrogatories, Set Two.

25 9. The Discovery Requests propounded by Quartz Hill Water District seek detailed  
26 information on AGWA members’ historical pumping of groundwater dating back to 1951,  
27 historical parcel ownership in the Basin, the number of wells on each parcel owned, annual  
28 pumping records for each parcel, as well as detailed information on well casings, horse power of

1 well pumps, standing water levels in wells for each year since 1951, and a wide variety of crop  
2 and meter records.

3 10. Quartz Hill Water District previously granted AGWA an extension of time to  
4 respond to the Discovery Requests, pending ongoing mediation before Justice Robie in this  
5 matter.

6 11. Producing the specified documents would cause unwarranted annoyance, and  
7 would be overly burdensome to AGWA members and counsel. AGWA is presently comprised of  
8 more than approximately 136 individual landowners, many of whom own multiple parcels.

9 12. Prior to filing this motion, I made a reasonable and good faith effort to resolve  
10 informally the issues presented by this motion.

11 13. On September 13, 2012, I telephoned Mr. Bradley Weeks, counsel for Quartz Hill  
12 Water District, in an effort to informally resolve AGWA's concerns with the discovery  
13 propounded. I discussed AGWA's concern that the Discovery Requests propounded by Quartz  
14 Hill are unduly burdensome and improper in light of ongoing mediation and the lack of details on  
15 the scope of any upcoming phase of trial, if indeed another phase of trial will be scheduled.

16 14. In our telephone conversation dated September 13, 2012, Mr. Weeks refused to  
17 withdraw his withdrawal of an extension of time to respond to the discovery requests propounded  
18 by Quartz Hill Water District. I informed Mr. Weeks that AGWA would be forced to file a  
19 motion for a protective order.

20 I declare under penalty of perjury under the laws of the State of California that the  
21 foregoing is true and correct. Executed in Santa Barbara, California, on September 19, 2012.

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25 MICHAEL T. FIFE  
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