

November 3, 2015

Robert H. Brumfield
Brumfield & Hagan, LLP
2031 F Street
Bakersfield, CA 93301

Michael T. Fife
Attorney at Law
805.882.1453 tel
805.965.4333 fax
MFife@bhfs.com

RE: Substitution of Attorney

Dear Mr. Brumfield:

Attached to this cover letter is the substitution of attorney form which you requested I sign in order to confirm your representation of Mark Ritter in the Antelope Valley adjudication. As you are aware, this is a unique situation and it is not clear that the filing of a substitution of attorney is necessary or appropriate. As a courtesy to you, we are signing the form you have provided, but believe it is important that such action be accompanied by an explanation of context. The purpose of this cover letter is to provide such context and is a component of our execution of the substitution of attorney form.

Sometime in 2005, the Ritters approached me about joining the group of defendants that my firm represents in the Antelope Valley adjudication. There are approximately 40 individuals in this group of defendants. The Ritters indicated an intention to join the group and were included within the group on our masthead based on their representation that they would join the group. Subsequently however, they refused to sign any of the necessary representation documents such as the fee agreement and conflict waiver for the group. They represented that they did not want to be a part of this group of defendants and did not want to be represented by my firm in the adjudication.

No attorney client relationship between my firm and the Ritters was ever formed. Neither I, nor anyone else at my firm ever investigated nor received any information about the Ritter's property or water use. Subsequent to their decision not to join our group of defendants neither I, nor anyone else at my firm, had any contact with them. They were never billed for any services.

On September 3, 2015 you filed a case management statement and indicated that you had accepted representation of Mark Ritter. Your case management statement requested that I sign a substitution of attorney form, and you repeated that request at the subsequent court hearing. At that hearing I indicated to the Court that I was willing to sign such a form. You have provided the present form pursuant to that request.

To be clear, while my signature on the form is made as of the date indicated, you have represented Mr. Ritter since at least the summer of 2015, and no attorney-client relationship has ever existed as between my firm and Mark Ritter, his parents, or his trust. Your firm is fully capable of representing the Ritter interests in this phase of trial, as you are doing for your other client who is similarly situated. This phase of trial is the first at which individual interests have been at issue, and whatever confusion may have existed in the past has been without prejudice to the Ritter interests.

Sincerely,



Michael T. Fife

Enclosures

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1020 State Street
Santa Barbara, CA 93101-2711
main 805.963.7000

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Robert H. Brumfield, SBN 114467 BRUMFIELD & HAGAN, LLP 2031 F Street Bakersfield, CA 93301 TELEPHONE NO.: 661.215.4980 FAX NO. (Optional): 661.215.4989 E-MAIL ADDRESS (Optional): bob@brumfield-haganlaw.com ATTORNEY FOR (Name): Defendant/Cross-Complainant, Mark Ritter	FOR COURT USE ONLY CASE NUMBER: 1-05-CV-049053
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Santa Clara STREET ADDRESS: 191 First Street MAILING ADDRESS: same CITY AND ZIP CODE: San Jose, CA 95113 BRANCH NAME: Hall of Justice	
CASE NAME: Antelope Valley Groundwater Cases	
SUBSTITUTION OF ATTORNEY—CIVIL (Without Court Order)	CASE NUMBER: 1-05-CV-049053

THE COURT AND ALL PARTIES ARE NOTIFIED THAT (name): Mark Ritter makes the following substitution:


- Former legal representative Party represented self Attorney (name): Michael T. Fife
- New legal representative Party is representing self* Attorney
 - Name: Robert H. Brumfield, III b. State Bar No. (if applicable): 114467
 - Address (number, street, city, ZIP, and law firm name, if applicable):
 Brumfield & Hagan, LLP, 2031 F Street, Bakersfield, CA 93301
 - Telephone No. (include area code): 661.215.4980
- The party making this substitution is a plaintiff defendant petitioner respondent other (specify):
 Defendant and Cross-Complainant


***NOTICE TO PARTIES APPLYING TO REPRESENT THEMSELVES**

- Guardian
- Personal Representative
- Guardian ad litem
- Conservator
- Probate fiduciary
- Unincorporated association
- Trustee
- Corporation

If you are applying as one of the parties on this list, you may NOT act as your own attorney in most cases. Use this form to substitute one attorney for another attorney. SEEK LEGAL ADVICE BEFORE APPLYING TO REPRESENT YOURSELF.

NOTICE TO PARTIES WITHOUT ATTORNEYS
 A party representing himself or herself may wish to seek legal assistance. Failure to take timely and appropriate action in this case may result in serious legal consequences.

4. I consent to this substitution.
 Date: November 2, 2015
Mark Ritter, successor trustee of the Ritter Family
(TYPE OR PRINT NAME) 
(SIGNATURE OF PARTY)

5. I consent to this substitution.
 Date: November 3, 2015 see cover letter
Michael T. Fife incorporated here by reference
(TYPE OR PRINT NAME) 
(SIGNATURE OF FORMER ATTORNEY)

6. I consent to this substitution.
 Date: November 2, 2015
Robert H. Brumfield, III
(TYPE OR PRINT NAME) 
(SIGNATURE OF NEW ATTORNEY)

(See reverse for proof of service by mail)

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PROOF OF SERVICE

I, Olga Rittershaus, am employed in the County of Santa Barbara, State of California. I am over the age of 18 and not a party to the within action; my business address is: Brownstein Hyatt Farber Schreck, LLP, 1020 State Street, Santa Barbara, California 93101.

On November 3, 2015, I served the foregoing document described as:

COVER LETTER AND SUBSTITUTION OF ATTORNEY

on the interested parties in this action.

By posting the document listed above to the Santa Clara Superior Court website: www.scefiling.org by 5:00 p.m. on November 3, 2015.

This posting was reported as complete and without error.

(STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed in Santa Barbara, California, on November 3, 2015.



OLGA RITTERSHAUS