1	WAYNE K. LEMIEUX (SBN. 43501) W. KEITH LEMIEUX (SBN. 161850)	
2	LEMIEUX & O'NEILL	
3	2393 Townsgate Road, Suite 201 Westlake Village, California 91361	
4	Telephone: (805) 495-4770 Facsimile: (805) 495-2787	
5	Attorneys for Cross-Defendant	
6	LITTLE BALDY MUTUAL WATER COMPANY	
7		
8	SUPERIOR COURT OF TH	IE STATE OF CALIFORNIA
9	IN AND FOR THE COU	JNTY OF LOS ANGELES
10	Coordinated Drassading) Judicial Council Coordination
11	Coordinated Proceeding Special Title (Rule 1550(b))	Proceeding No. 4408
12	ANTELOPE VALLEY GROUNDWATER	Santa Clara Case No. 1-05-CV-049053
13	CASES	Assigned to the Honorable Jack Komar – Dept. 17
14	Included Actions:	ANSWER OF CROSS-DEFENDANT LITTLE
15	Los Angeles County Waterworks District No. 40	BALDY MUTUAL WATER COMPANY TO FIRST AMENDED CROSS-COMPLAINT OF
16	v. Diamond Farming Co. Los Angeles County Superior Court Case No. BC 325201;	PUBLIC WATER SUPPLIERS FOR
17	Los Angeles County Waterworks District No. 40	DECLARATORY AND INJUNCTIVE RELIEF AND ADJUDICATION OF WATER RIGHTS
18	v. Diamond Farming Co., Kern County Superior Court, Case No. S-1500-CV-234348;	
19	Wm. Bolthouse Farms, Inc. v. City of Lancaster	
20	Diamond Farming Co. v. City of Lancaster v.	
21	Palmdale Water District, Riverside County Superior Court, Consolidated Actions, Case Nos.	
22	RIC 353840, RIC 344436, RIC 344668	
23	AND RELATED CROSS-ACTIONS	
24		
25	LITTLE BALDY MUTUAL WATER COM	PANY hereby answers the First Amended Cross-
26	Complaint of Public Water Suppliers for Declarator	y and Injunctive Relief and Adjudication of Water
27	Rights as follows:	
28	Ans.LBMWC.WatSuppl1stAm.XComp.doc - 1 -	-
	ANSWER OF LBMWC TO FIRST AMENDED CRO	OSS-COMPLAINT OF PUBLIC WATER SUPPLIERS

GENERAL DENIAL
1. Pursuant to Code of Civil Procedure section 431.30(d), Little Baldy Mutual Water
Company generally and specifically deny each and every allegation contained in the First Amended
Cross-Complaint of Public Water Suppliers for Declaratory and Injunctive Relief and Adjudication of
Water Rights, and further denies that Cross-Complainants are entitled to any relief against Cross-
Defendant.
AFFIRMATIVE DEFENSES
FIRST AFFIRMATIVE DEFENSE
(Failure to State a Cause of Action)
2. The First Amended Cross-Complaint and every purported cause of action contained therein
fail to allege facts sufficient to constitute a cause of action against answering Cross-Defendant.
SECOND AFFIRMATIVE DEFENSE
(Statute of Limitations)
3. Each and every cause of action contained in the First Amended Cross-Complaint is barred,
in whole or in part, by the applicable statute of limitations, including, but not limited to, sections 318,
319, 321, 338, 343 of the California Code of Civil Procedure.
THIRD AFFIRMATIVE DEFENSE
(Laches)
4. The First Amended Cross-Complaint, and each and every cause of action contained
therein, is barred by the doctrine of laches.
FOURTH AFFIRMATIVE DEFENSE
(Estoppel)
5. The First Amended Cross-Complaint, and each and every cause of action contained
therein, is barred by the doctrine of estoppel.
//
//
Ans.LBMWC.WatSuppl1stAm.XComp.doc – 2 –

1	FIFTH AFFIRMATIVE DEFENSE	
2	(Waiver)	
3	6. The First Amended Cross-Complaint, and each and every cause of action contained	
4	therein, is barred by the doctrine of waiver.	
5	SIXTH AFFIRMATIVE DEFENSE	
6	(Self-Help)	
7	7. Cross-Defendant has, by virtue of the doctrine of self-help, preserved its paramount	
8	overlying right to extract groundwater by continuing, during all times relevant hereto, to extract	
9	groundwater and put it to reasonable and beneficial use on its property.	
10	SEVENTH AFFIRMATIVE DEFENSE	
11	(California Constitution Article X, Section 2)	
12	8. Cross-Complainants' methods of water use and storage are unreasonable and wasteful in	
13		
14	Constitution.	
15	EIGHTH AFFIRMATIVE DEFENSE	
16	(Additional Defenses)	
10	(Additional Defenses)	
10	 (Additional Defenses) 9. The First Amended Cross-Complaint does not state their allegations with sufficient clarity 	
17	9. The First Amended Cross-Complaint does not state their allegations with sufficient clarity	
17 18	9. The First Amended Cross-Complaint does not state their allegations with sufficient clarity to enable Cross-Defendant to determine what additional defenses may exist to Cross-Complainants'	
17 18 19	9. The First Amended Cross-Complaint does not state their allegations with sufficient clarity to enable Cross-Defendant to determine what additional defenses may exist to Cross-Complainants' causes of action. Cross-Defendant therefore reserves the right to assert all other defenses which may	
17 18 19 20	9. The First Amended Cross-Complaint does not state their allegations with sufficient clarity to enable Cross-Defendant to determine what additional defenses may exist to Cross-Complainants' causes of action. Cross-Defendant therefore reserves the right to assert all other defenses which may pertain to the First Amended Cross-Complaint.	
17 18 19 20 21	9. The First Amended Cross-Complaint does not state their allegations with sufficient clarity to enable Cross-Defendant to determine what additional defenses may exist to Cross-Complainants' causes of action. Cross-Defendant therefore reserves the right to assert all other defenses which may pertain to the First Amended Cross-Complaint. NINTH AFFIRMATIVE DEFENSE	
 17 18 19 20 21 22 	 9. The First Amended Cross-Complaint does not state their allegations with sufficient clarity to enable Cross-Defendant to determine what additional defenses may exist to Cross-Complainants' causes of action. Cross-Defendant therefore reserves the right to assert all other defenses which may pertain to the First Amended Cross-Complaint. NINTH AFFIRMATIVE DEFENSE 10. The prescriptive claims asserted by governmental entity Cross-Complainants are <i>ultra</i> 	
 17 18 19 20 21 22 23 	 9. The First Amended Cross-Complaint does not state their allegations with sufficient clarity to enable Cross-Defendant to determine what additional defenses may exist to Cross-Complainants' causes of action. Cross-Defendant therefore reserves the right to assert all other defenses which may pertain to the First Amended Cross-Complaint. NINTH AFFIRMATIVE DEFENSE 10. The prescriptive claims asserted by governmental entity Cross-Complainants are <i>ultra vires</i> and exceed the statutory authority by which each entity may acquire property as set forth in Water 	
 17 18 19 20 21 22 23 24 	 9. The First Amended Cross-Complaint does not state their allegations with sufficient clarity to enable Cross-Defendant to determine what additional defenses may exist to Cross-Complainants' causes of action. Cross-Defendant therefore reserves the right to assert all other defenses which may pertain to the First Amended Cross-Complaint. NINTH AFFIRMATIVE DEFENSE 10. The prescriptive claims asserted by governmental entity Cross-Complainants are <i>ultra vires</i> and exceed the statutory authority by which each entity may acquire property as set forth in Water Code section 22456, 31040 and 55370. 	
 17 18 19 20 21 22 23 24 25 	 9. The First Amended Cross-Complaint does not state their allegations with sufficient clarity to enable Cross-Defendant to determine what additional defenses may exist to Cross-Complainants' causes of action. Cross-Defendant therefore reserves the right to assert all other defenses which may pertain to the First Amended Cross-Complaint. NINTH AFFIRMATIVE DEFENSE 10. The prescriptive claims asserted by governmental entity Cross-Complainants are <i>ultra vires</i> and exceed the statutory authority by which each entity may acquire property as set forth in Water Code section 22456, 31040 and 55370. ENTH AFFIRMATIVE DEFENSE	
 17 18 19 20 21 22 23 24 25 26 	 9. The First Amended Cross-Complaint does not state their allegations with sufficient clarity to enable Cross-Defendant to determine what additional defenses may exist to Cross-Complainants' causes of action. Cross-Defendant therefore reserves the right to assert all other defenses which may pertain to the First Amended Cross-Complaint. NINTH AFFIRMATIVE DEFENSE 10. The prescriptive claims asserted by governmental entity Cross-Complainants are <i>ultra vires</i> and exceed the statutory authority by which each entity may acquire property as set forth in Water Code section 22456, 31040 and 55370. TENTH AFFIRMATIVE DEFENSE 11. The prescriptive claims asserted by governmental entity Cross-Complainants are barred by	

Ш

1	ELEVENTH AFFIRMATIVE DEFENSE		
2	12. The prescriptive claims asserted by governmental entity Cross-Complainants are barred by		
3	the provisions of the Fifth Amendment to the United States Constitution as applied to the States under the		
4	Fourteenth Amendment of the United States Constitution.		
5	TWELFTH AFFIRMATIVE DEFENSE		
6	13. Cross-Complainants' prescriptive claims are barred due to their failure to take affirmative		
7	steps that were reasonably calculated and intended to inform each overlying landowner of Cross-		
8	Complainants' adverse and hostile claims as required by the due process clause of the Fifth and		
9	Fourteenth Amendment of the United States Constitution.		
10	THIRTEENTH AFFIRMATIVE DEFENSE		
11	14. The prescriptive claims asserted by governmental entity Cross-Complainants are barred by		
12	the provisions of Article I, Section 7 of the California Constitution.		
13	FOURTEENTH AFFIRMATIVE DEFENSE		
14	15. The prescriptive claims asserted by governmental entity Cross-Complainants are barred by		
15	5 the provisions of the Fourteenth Amendment to the United States Constitution.		
16	FIFTEENTH AFFIRMATIVE DEFENSE		
17	16. The governmental entity Cross-Complainants were permissively pumping at all times.		
18	SIXTEENTH AFFIRMATIVE DEFENSE		
19	17. The request for the court to use its injunctive powers to impose a physical solution seeks a		
20	remedy that is in violation of the doctrine of separation of powers set forth in Article 3, Section 3 of the		
21	California Constitution.		
22	SEVENTEENTH AFFIRMATIVE DEFENSE		
23	18. Cross-Complainants are barred from asserting their prescriptive claims by operation of		
24	laws as set forth in Civil Code sections 1007 and 1214.		
25	//		
26	//		
27			
28	Ans.LBMWC.WatSuppl1stAm.XComp.doc – 4 –		
	ANSWER OF LBMWC TO FIRST AMENDED CROSS-COMPLAINT OF PUBLIC WATER SUPPLIERS		

1	EIGHTEENTH AFFIRMATIVE DEFENSE		
2	19. Each Cross-Complainant is barred from recovery under each and every cause of action		
3	contained in the First Amended Cross-Complaint by the doctrine of unclean hands and/or unjust		
4	enrichment.		
5	NINETEENTH AFFIRMATIVE DEFENSE		
6	20. The First Amended Cross-Complaint is defective because it fails to name indispensable		
7	parties in violation of California Code of Civil Procedure Section 389(a).		
8	TWENTIETH AFFIRMATIVE DEFENSE		
9	21. The governmental entity Cross-Complainants are barred from taking, possessing or using		
10	Cross-Defendant's property without first paying just compensation.		
11	TWENTY-FIRST AFFIRMATIVE DEFENSE		
12	22. The governmental entity Cross-Complainants are seeking to transfer water right priorities		
13	and water usage which will have significant effects on the Antelope Valley Groundwater basin and the		
14	Antelope Valley. Said actions are being done without complying with and contrary to the provisions of		
15	the California Environmental Quality Act ("CEQA") (Pub.Res.C. 2100 et seq.)		
16	TWENTY-SECOND AFFIRMATIVE DEFENSE		
17	23. The governmental entity Cross-Complainants seek judicial ratification of a project that has		
18	had and will have a significant effect on the Antelope Valley Groundwater basin and the Antelope Valley		
19	that was implemented without providing notice in contravention of the provision of the California		
20	Environmental Quality Act ("CEQA") (Pub.Res.C. 2100 et seq.)		
21	TWENTY-THIRD AFFIRMATIVE DEFENSE		
22	24. Amy imposition by this court of a proposed physical solution that reallocates the water		
23	right priorities and water usage within the Antelope Valley will be <i>ultra vires</i> as it will be subverting the		
24	pre-project legislative requirements and protections of the California Environmental Quality Act		
25	("CEQA") (Pub.Res.C. 2100 et seq.)		
26	//		
27	//		
28	Ans.LBMWC.WatSuppl1stAm.XComp.doc – 5 –		
	ANSWER OF LBMWC TO FIRST AMENDED CROSS-COMPLAINT OF PUBLIC WATER SUPPLIERS		

1	WHEREFORE, Cross-Defendant prays that judgment be entered as follows:		
2	1.	1. That Cross-Complainants take nothing by reason of its First Amended Cross-Complaint;	
3	2.	That the First Amend	ed Cross-Complaint be dismissed with prejudice;
4	3.	For Cross-Defendant	's costs incurred herein; and
5	4.	For such other and fu	rther relief as the Court deems just and proper.
6	DATED: Set	ptember 26, 2007	LEMIEUX & O'NEILL
7		L Ý	/s/
8			By
9			W. KEITH LEMIEUX Attorneys for Little Baldy Mutual Water Company
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			
26 27			
27			
28		Suppl1stAm.XComp.doc	- 6 -
	ANSWE	CR OF LBMWC TO FIRST	SAMENDED CROSS-COMPLAINT OF PUBLIC WATER SUPPLIERS

1	PROOF OF SERVICE
2	STATE OF CALIFORNIA,)
3) ss. COUNTY OF VENTURA)
4	
5 6	I am employed in the County of Ventura, State of California. I am over the age of 18 and not a party to the within action. My business address is 2393 Townsgate Road, Suite 201, Westlake Village, California 91361.
7	On September 26, 2007 , I posted the following document(s) to the website
8	http://www.scefiling.org, a dedicated link to the Antelope Valley Groundwater Cases:
9	ANSWER OF CROSS-DEFENDANT LITTLE BALDY MUTUAL WATER COMPANY TO
10	FIRST AMENDED CROSS-COMPLAINT OF PUBLIC WATER SUPPLIERS FOR DECLARATORY AND INJUNCTIVE RELIEF AND ADJUDICATION OF WATER RIGHTS
11	
12	I declare under penalty of perjury under the laws of the United State of America that the above is true and correct.
13	Executed on September 26, 2007, in Westlake Village, California.
14	
15	/s/
16	KATHI MIERS
17	
18	
19 10	
20	
21 22	
22	
23	
25	
26	
27	
28	Ans.LBMWC.WatSuppl1stAm.XComp.doc – 7 –
	ANSWER OF LBMWC TO FIRST AMENDED CROSS-COMPLAINT OF PUBLIC WATER SUPPLIERS

OF DAY	<u>се і іст</u>
SERVICE LIST	
	Cases: Case No. 1: 05-CV-049053
Eduardo Angeles, Esq.	Attorneys for City of Los Angeles – Airport
MANAGING CITY ATTORNEY	Division
1 World Way	Tel: 310/646-3260
Los Angeles, CA 90009	Fax: 310/646-9617 Eangeles@lawa.org
	<u>Hangorooynawa.org</u>
Richard M. Brown, Esq.	Attorneys for Dept. Of Water & Power
Department of Water & Power 111 North Hope St.	
P. O. Box 111	Tel: 213/367-4598
Los Angeles, CA 90012	Fax: 213/367-4588
	Richard.Brown@ladwp.com
Thomas Bunn, Esq.	Attorneys for Palmdale Water District and
LAGERLOF, SENECAL, BRADLEY, GOSNEY	Quartz Hill Water District
& KRUSE	Tel: 626/793-9400
301 North Lake Ave., 10 th Floor Pasadena, CA 91101-4108	Fax: 626/793-6900
rasauena, UA 91101-4108	TomBunn@lagerlof.com
Marvin G. Burns, Esq. Marvin G. Burns, A Law Corporation	Attorneys for George Stevens, Jr., & George C. Stevens, Jr., Trust
9107 Wilshire Blvd., Suite 800	Tel: 310/278-6500
Beverly Hills, CA 90210-5533	Fax: 310/203-9608
	MBurns@lurie-zepeda.com
Edward J. Casey, Esq.	Attorneys for Palmdale Hills Property LLC
WESTON BENSHOOF ROCHEFORT	Tel: 213/576-1005
RUBALCAVA MacCUISH LLP	Fax: 213/576-1100
333 So. Hope St., 16 th Floor Los Angeles, CA 90071	ECasey@wbcounsel.com
Julie A. Conboy, Deputy City Attorney	Attorneys for Department of Water & Power
Department of Water and Power	
111 North Hope Street	Tel: 213/367-4513
P.O. Box 111	Fax: 213/241-1409
Los Angeles, CA 90012	Julie.Conboy@ladwp.com
Wm. Matthew Ditzhazy, Esq.	Attorney for City of Palmdale
CITY OF PALMDALE – Legal Dept.	Tel: 805/267-5108
38300 North Sierra Hwy. Belmdele, CA, 92550	Fax: 805/267-5178
Palmdale, CA 93550	mditzhazy@cityofpalmdale.com
Ans.LBMWC.WatSuppl1stAm.XComp.doc - 8 -	-
ANSWER OF LBMWC TO FIRST AMENDED CRO	OSS-COMPLAINT OF PUBLIC WATER SUPPLIERS
	See Community of Fublic WATER BUTT LIERD

Jeff Dunn, Esq. BEST, BEST & KRIEGER 5 Park Plaza, Suite 1500 Irvine, CA 92614	Attorneys for Los Angeles County Waterworl District No. 40 and Rosamond Community Tel: 949/263-2600 Fax: 949/260-0972 Jeff.dunn@bbklaw.com
Douglas J. Evertz, Esq. STRADLING, YOCCA, CARLSON & RAUTH 660 Newport Center Dr., Suite 1600 Newport Beach, CA 92660-6522 Michael T. Fife, Esq. HATCH & PARENT 21 East Carrillo Street Santa Barbara, CA 93101	Jeff.dunn@bbklaw.com Attorney for City of Lancaster Tel: 949/725-4000 Fax: 949/725-4100 Devertz@sycr.com Attorney for Eugene B. Nebeker on behalf of Nebeker Ranch, Inc., Bob Jones on behalf of R&M Ranch, Inc., Forrest G. Godde and Stev Godde, Gailen Kyle on behalf of Kyle & Kyle Ranch, Inc., and John Calandri on behalf of Calandri/ Sonrise Farms, collectively known the Antelope Valley Groundwater Association ("AGWA")
	Tel: 805/963-7000 Fax: 805/965-4333 <u>Mfife@hatchparent.com</u>
Eric L. Garner, Esq. BEST, BEST & KRIEGER 3750 University Ave., Suite 400 P. O. Box 1028 Riverside, CA 92602-1028	Attorneys for Los Angeles County Waterwork District No. 40 and Rosamond Community Services District Tel: 951/686-1450 Fax: 951/686-3083 <u>Eric.garner@bbklaw.com</u>
Janet Goldsmith, Esq. KRONICK, MOSKOWITZ, TIEDMANN & GIRARD 400 Capitol Mall, 27 th Floor Sacramento, CA 95814-4417	Attorneys for City of Los Angeles Tel: 916/321-4500 Fax: 916/321-4555 jgoldsmith@KMTG.com
Mark J. Hattam, Esq. ALLEN MATKINS LECK GAMBLE & MALLORY LLP 501 West Broadway, 15 th Floor San Diego, CA 921010-3541	Attorneys for SPC Del Sur Ranch LLC Tel: 619/233-1155 Fax: 619/233-1158 <u>Mhattam@allenmatkins.com</u>
Tammy L. Jones, Esq. WESTON BENSHOOF ROCHEFORT RUBALCAVA MacCUISH LLP 333 S. Hope St., 16 th Floor Los Angeles, CA 90071	Attorneys for Palmdale Hills Property LLC Tel: 213/576-1000 Fax: 213/ 576-1100 tjones@wbcounsel.com
Ans.LBMWC.WatSuppl1stAm.XComp.doc – 9	

Bob H. Joyce, Esq.	Attorneys for Diamond Farming Co.	
LEBEAU – THELEN		
5001 East Commercenter Dr., #300 P. O. Box 12092	Tel: 661/325-8962	
Bakersfield, CA 93389-2092	Fax: 661/325-1127 bjoyce@lebeauthelen.com	
Dakersheiu, CA 55365-2052	bjoyce@iebeautileien.com	
Steven M. Kennedy, Esq.	Attorneys for Antelope Valley East Kern Wate	
BRUNICK, McELHANEY & BECKETT	Agency	
2839 Commercenter West	Tel: 909/889-8301	
San Bernardino, CA 92408	Fax: 090/388-1889	
,	skennedy@bbmblaw.com	
Scott K. Kuney, Esq.	Attorneys for Gertrude J. Van Dam and Delm	
YOUNG WOOLDRIDGE	D. Van Dam	
1800 30 TH Street, 4 th Floor	Tel: 661/327-9661	
Bakersfield, CA 93301	Fax: 661/327-0720	
	skuney@youngwooldridge.com	
James L. Markman, Esq.	Attorneys for City of Palmdale	
RICHARDS, WATSON & GERSHON	Tel: 714/990-0901	
P. O. Box 1059	Fax: 714/990-6230	
Brea, CA 92822-1059	jmarkman@rwglaw.com	
Dale Murad, Esq.	Attorneys for U. S. Department of the Air Ford	
AFLSA/JACE	– Edwards Air Force Base	
1501 Wilson Blvd., Suite 629	Tel: 703/696-9166	
Arlington, VA 22209-2403	Fax: 703/696-9184	
	[no email]	
Steven R. Orr, Esq.	Attorneys for City of Palmdale Tel: 213/626-8484	
RICHARDS, WATSON & GERSHON		
355 S. Grand Ave., 40 th Floor Los Angeles, CA 90071-3101	Fax: 213/626-0078	
Los Angeles, CA 90071-3101	<u>Sorr@rwglaw.com</u>	
Jeffrey Robbins, Esq.	Attorneys of City of Lancaster	
STRADLING YOCCA CARLSON & RAUTH	Tel: 949/737-4720	
660 Newport Center Drive, Suite 1600	Fax: 916/823-6720	
Newport Beach, CA 92660	JRobbins@sycr.com	
Christopher M. Sanders, Esq.	Attorneys for County Sanitation Districts Nos	
EILLISON, SCHNEIDER & HARRIS	14 and 20 of Los Angeles County	
2015 "H" Street	Tel: 916/447-2166	
Sacramento, CA 95814	Fax: 916/447-3512	
	<u>cms@eslawfirm.com</u>	
Robert B. Schachter, Esq.	Attorneys for Guss A. Barks and Peter G. Bark	
HITCHCOCK, BOWMAN & SCHACHTER	Tel: 310/540-2202	
21515 Hawthorne Blvd., Suite 1030	Fax: 310/540-8734	
Torrance, CA 90503-6579	HBSattylaw@aol.com	
Ans.LBMWC.WatSuppl1stAm.XComp.doc - 10) –	

Loretta Slaton, Esq. Law Office of Loretta Slaton	Attorneys for Air Trust Singaport Limited Tel: 949/587-2832
2294 Via Puerta, Suite O	Fax: 949/855-1959
Laguna Hills, CA 92653	Lslaton81@aol.com
Jon A. Slezak, Esq.	Attorneys for City of Los Angeles, Dept. of
IVERSON, YOAKUM, PAPIANO & HATCH	Airports
624 South Grand Ave., 27th Floor	Tel: 213/624-7444
Los Angeles, CA 90017	Fax: 213/629-4563
	jslesak@lyph.com
William Sloan, Esq.	Attorneys for U. S. Borax, Inc.
MORRISON & FOERSTER LLP	Tel: 415/268-6127
425 Market Street	Fax: 415/276-7545
San Francisco, CA 94105	wsloan@mofo.com
John Tootle, Esq.	Attorneys for Antelope Valley Water Company
CALIFORNIA WATER SERVICE COMPANY	Tel: 310/257-1488 x 322
3625 Del Amo Blvd., Suite 350	Fax: 310/325-4691
Torrance, CA 90503	jtootle@calwater.com
Henry Weinstock, Esq.	Attorney for Tejon Ranch
Fred Fudacz, Esq.	T 1 010/010 F 000
NOSSAMAN, GUTHNER, KNOX, ELLIOTT,	Tel: 213/612-7839
LLP 445 South Figueroa St., 31 st Floor	Fax: 213/612-7801 hweinstock@nossaman.com
Los Angeles, CA 90071	<u>nwemstockwnossaman.com</u>
Richard G. Zimmer, Esq.	Attorneys for Wm Bolthouse Farms, Inc.
CLIFFORD & BROWN	Tel: 661/322-6023
1430 Truxtun Ave., Suite 900	Fax: 661/322-3508
Bakersfield, CA 93301-5230	rzimmer@clifford-brownlaw.com
AG and DOJ:	
Michael Crow, Esq.	Parties: State of California; Santa Monica
Office of the California Attorney General	Mountains Conservancy; 50 th District
1300 "I" Street	Agricultural Association Tel: 916/327-7856
Sacramento, CA 95814	Fax: 916/327-2319
	Michael.Crow@doj.ca.gov
Lee Leininger, Esq.	Parties: United States of America
U.S. Department of Justice Envinonmental & Natural Resources Section	Tel: 303/312-7322
999 – 18 th Street, Suite 945, North Tower	Fax: 303/312-7379
Denver, CO 80202	Lee.leininger@usdoj.gov
Debra W. Yang, United States Attorney	
Ans.LBMWC.WatSuppl1stAm.XComp.doc - 11	-

300 North Los Angeles St., Rm 7516, Fed. Bldg. [no email] Los Angeles, CA 90012	United States Attorney's Office, Central District	Tel: 213/894-2474
Los Angeles, CA 90012 Image: CA 90012 Robert J. Spagnoletti, Esq. Tel: 202/727-6248 Attorney General for the District of Columbia Fax: 202/ Washington, DC 20001 Ino email] Robert S. McDonnell, Esq. Tel: 804/786-2071 Attorney General of Virginia Tel: 804/786-2071 900 East Main Street Fax: 804/786-1991 Richmond, VA 23219 mail@oag.state.va.us Court Personnel: Presiding Judge of the Superior Court of CRC Rules 1501(17) and 1540: California, County of Los Angeles Coordination Trial Judge 111 N. Hill Street Coordination Trial Judge Los Angeles, CA 90012-3014 By Mail Honorable Jack Komar By Mail Santa Clara County Superior Court Fax: 408/882-2286 Fax: 408/882-2293 rwalker@scscourt.org Superior Court of California Original Document(s) to be filed at this location. Superior Court of California CRC Rule 1511: *Serve only when required transmitted to Judicial Council. 'Chair, Judicial Council of California CRC Rule 1511: *Serve only when required transmitted to Judicial Council. 'Chair, Appellate & Trial Court Judicial Services CRC Rule 1511: *Serve only when require		Fax: 213/894-2380
Robert J. Spagnoletti, Esq. Attorney General for the District of Columbia 441 Fourth St., NW, 6 th Floor South Washington, DC 20001Tel: 202/727-6248 Fax: 202/ [no email]Robert S. McDonnell, Esq. Attorney General of Virginia 900 East Main Street Richmond, VA 23219Tel: 804/786-2071 Fax: 804/786-1991 mail@oag.state.va.usCourt Personnel: Presiding Judge of the Superior Court of California, County of Los Angeles 111 N. Hill Street Los Angeles, CA 90012-3014Tel: 508/882-2286 Fax: 408/882-2293 rwalker@scscourt.orgBy Mail Tel: 508/882-2293 rwalker@scscourt.orgOriginal Document(s) to be filed at this location.Superior Court of California County of Los Angeles Stanley Mosk Courthouse—Dept. 1, Rm 534 111 North Hill Street Los Angeles, CA 90012Original Document(s) to be filed at this location.County of Los Angeles County of Los Angeles County of Los Angeles County of Los Angeles County of Los Angeles Stanley Mosk Courthouse—Dept. 1, Rm 534 (111 North Hill Street Los Angeles, CA 90012Original Document(s) to be filed at this location.CRC Rule 1511: *Serve only when required transmitted to Judicial Council.CRC Rule 1511: *Serve only when required transmitted to Judicial Council.		[no email]
Attorney General for the District of Columbia Tel: 202/727-6248 441 Fourth St., NW, 6 th Floor South Fax: 202/ Washington, DC 20001 [no email] Robert S. McDonnell, Esq. Tel: 804/786-2071 Attorney General of Virginia Tel: 804/786-1991 900 East Main Street Fax: 804/786-1991 Richmond, VA 23219 mail@oag.state.va.us Court Personnel: Court Personnel: Presiding Judge of the Superior Court of CRC Rules 1501(17) and 1540: California, County of Los Angeles Coordination Trial Judge 111 N. Hill Street Coordination Trial Judge Los Angeles, CA 90012-3014 Tel: 508/882-2286 Stanta Clara County Superior Court Fax: 408/882-2293 Stanta Clara County Superior Court Fax: 408/882-2293 Stanley Mosk Courthouse—Dept. 1, Rm 534 Original Document(s) to be filed at this location. Stanley Mosk Courthouse—Dept. 1, Rm 534 Incation. 111 North Hill Street Cordifornia Los Angeles, CA 90012 CRC Rule 1511: *Serve only when required transmitted to Judicial Council. *Chair, Judicial Council of California CRC Rule 1511: *Serve only when required transmitted to Judicial Council. *Chair, Appellate & Trial Co	Los Angeles, CA 90012	
441 Fourth St., NW, 6th Floor South Fax: 202/ Washington, DC 20001 [no email] Robert S. McDonnell, Esq. Tel: 804/786-2071 Attorney General of Virginia Fax: 804/786-1991 B00 East Main Street Fax: 804/786-1991 Richmond, VA 23219 mail@oag.state.va.us Court Personnel: CCurt Personnel: Presiding Judge of the Superior Court of CRC Rules 1501(17) and 1540: California, County of Los Angeles Coordination Trial Judge 111 N. Hill Street Coordination Trial Judge Los Angeles, CA 90012-3014 Tel: 508/882-2286 Fax: 408/882-2286 Fax: 408/882-2286 191 North First Street, Dept. 17C Fax: 408/882-2286 San Jose, CA 95113 rwalker@scscourt.org Superior Court of California Original Document(s) to be filed at this location. Stanley Mosk Courthouse—Dept. 1, Rm 534 Int. North Hill Street Los Angeles, CA 90012 CRC Rule 1511: *Serve only when required transmitted to Judicial Council. *Chair, Judicial Council of California CRC Rule 1511: *Serve only when required transmitted to Judicial Council. *Chair, Appellate & Trial Court Judicial Services CRC Rule 1511: *Serve only when required transmitted to Judicial Council.	Robert J. Spagnoletti, Esq.	
Washington, DC 20001 [no email] Robert S. McDonnell, Esq. Tel: 804/786-2071 Attorney General of Virginia Tel: 804/786-2071 900 East Main Street Fax: 804/786-1991 Richmond, VA 23219 mail@oag.state.va.us Court Personnel: Presiding Judge of the Superior Court of California, County of Los Angeles Coordination Trial Judge L11 N. Hill Street Coordination Trial Judge Los Angeles, CA 90012-3014 Tel: 508/882-2286 Fax: 408/882-2293 Fax: 408/882-2293 Santa Clara County Superior Court Tel: 508/882-2293 191 North First Street, Dept. 17C Fax: 408/882-2293 San Jose, CA 95113 rwalker@scscourt.org Superior Court of California Original Document(s) to be filed at this location. Stanley Mosk Courthouse—Dept. 1, Rm 534 I1.1 North Hill Street Los Angeles, CA 90012 CRC Rule 1511: *Serve only when required transmitted to Judicial Council. *Chair, Judicial Council of California CRC Rule 1511: *Serve only when required transmitted to Judicial Council. *Chair, Judicial Council of California CRC Rule 1511: *Serve only when required transmitted to Judicial Council. *Chair, Judicial Council of California CRC Rule 1511: *Serve only		Tel: 202/727-6248
Robert S. McDonnell, Esq. Attorney General of Virginia 900 East Main Street Richmond, VA 23219 Court Personnel: Presiding Judge of the Superior Court of California, County of Los Angeles 111 N. Hill Street Los Angeles, CA 90012-3014 Honorable Jack Komar Sand Clara County Superior Court 191 North First Street, Dept. 17C San Jose, CA 95113 Superior Court of California Courty of Los Angeles Stanley Mosk Courthouse—Dept. 1, Rm 534 111 North Hill Street Los Angeles, CA 90012 Stanley Mosk Courthouse—Dept. 1, Rm 534 111 North Kirst Ve Office of the Courts Administrative Office of the Courts Atter: Appellate & Trial Court Judicial Services (Civil Case Coordination) 455 Golden Gate Avenue	441 Fourth St., NW, 6 th Floor South	Fax: 202/
Attorney General of VirginiaTel: 804/786-2071200 East Main StreetFax: 804/786-1991Richmond, VA 23219mail@oag.state.va.usCourt Personnel:Court Personnel:Presiding Judge of the Superior Court of California, County of Los AngelesCRC Rules 1501(17) and 1540: Coordination Trial Judge111 N. Hill StreetCoordination Trial JudgeLos Angeles, CA 90012-3014By MailBanta Clara County Superior Court 191 North First Street, Dept. 17CFax: 408/882-2286 Fax: 408/882-2293 rwalker@scscourt.orgSuperior Court of California County of Los AngelesOriginal Document(s) to be filed at this location.Superior Court of California County of Los AngelesOriginal Document(s) to be filed at this location.Stanley Mosk Courthouse—Dept. 1, Rm 534 111 North Hill Street Los Angeles, CA 90012CRC Rule 1511: *Serve only when required transmitted to Judicial Council.*Chair, Judicial Council of California Administrative Office of the Courts Attn: Appellate & Trial Court Judicial Services (Civil Case Coordination) 455 Golden Gate AvenueCRC Rule 1511: *Serve only when required transmitted to Judicial Council.	Washington, DC 20001	[no email]
Attorney General of VirginiaTel: 804/786-2071200 East Main StreetFax: 804/786-1991Richmond, VA 23219mail@oag.state.va.usCourt Personnel:Court Personnel:Presiding Judge of the Superior Court of California, County of Los AngelesCRC Rules 1501(17) and 1540: Coordination Trial Judge111 N. Hill StreetCoordination Trial JudgeLos Angeles, CA 90012-3014By MailBanta Clara County Superior Court 191 North First Street, Dept. 17CFax: 408/882-2286 Fax: 408/882-2293 rwalker@scscourt.orgSuperior Court of California County of Los AngelesOriginal Document(s) to be filed at this location.Superior Court of California County of Los AngelesOriginal Document(s) to be filed at this location.Stanley Mosk Courthouse—Dept. 1, Rm 534 111 North Hill Street Los Angeles, CA 90012CRC Rule 1511: *Serve only when required transmitted to Judicial Council.*Chair, Judicial Council of California Administrative Office of the Courts Attn: Appellate & Trial Court Judicial Services (Civil Case Coordination) 455 Golden Gate AvenueCRC Rule 1511: *Serve only when required transmitted to Judicial Council.		
200 East Main Street Fax: 804/786-1991 Richmond, VA 23219 mail@oag.state.va.us Court Personnel: CRC Rules 1501(17) and 1540: Presiding Judge of the Superior Court of CRC Rules 1501(17) and 1540: California, County of Los Angeles Coordination Trial Judge 111 N. Hill Street Coordination Trial Judge Los Angeles, CA 90012-3014 By Mail Honorable Jack Komar By Mail Santa Clara County Superior Court Fax: 408/882-2293 Yeal Stante Claifornia Court of California County of Los Angeles rwalker@scscourt.org Stanley Mosk Courthouse—Dept. 1, Rm 534 Original Document(s) to be filed at this location. *Chair, Judicial Council of California CRC Rule 1511: *Serve only when required transmitted to Judicial Council. *Chair, Appellate & Trial Court Judicial Services CRC Rule 1511: *Serve only when required transmitted to Judicial Council. 455 Golden Gate Avenue CRC Rule 1511: *Serve only when required transmitted to Judicial Council.		
Richmond, VA 23219 mail@oag.state.va.us Court Personnel:		
Court Personnel: Presiding Judge of the Superior Court of California, County of Los Angeles 111 N. Hill Street Los Angeles, CA 90012-3014 Honorable Jack Komar Santa Clara County Superior Court 191 North First Street, Dept. 17C San Jose, CA 95113 Superior Court of California County of Los Angeles Superior Court of California County of Los Angeles Stanley Mosk Courthouse—Dept. 1, Rm 534 111 North Hill Street Los Angeles, CA 90012 *Chair, Judicial Council of California Administrative Office of the Courts Attn: Appellate & Trial Court Judicial Services (Civil Case Coordination) 455 Golden Gate Avenue		
Presiding Judge of the Superior Court of California, County of Los Angeles 111 N. Hill Street Los Angeles, CA 90012-3014 Honorable Jack Komar Santa Clara County Superior Court 191 North First Street, Dept. 17C San Jose, CA 95113 Superior Court of California County of Los Angeles Stanley Mosk Courthouse—Dept. 1, Rm 534 111 North Hill Street Los Angeles, CA 90012 *Chair, Judicial Council of California Administrative Office of the Courts Attn: Appellate & Trial Court Judicial Services (Civil Case Coordination) 455 Golden Gate Avenue	Richmond, VA 23219	mail@oag.state.va.us
California, County of Los Angeles Coordination Trial Judge 111 N. Hill Street Coordination Trial Judge Los Angeles, CA 90012-3014 By Mail Honorable Jack Komar By Mail Santa Clara County Superior Court Tel: 508/882-2286 191 North First Street, Dept. 17C Fax: 408/882-2293 San Jose, CA 95113 rwalker@scscourt.org Superior Court of California Original Document(s) to be filed at this County of Los Angeles Original Document(s) to be filed at this Stanley Mosk Courthouse—Dept. 1, Rm 534 Interface 111 North Hill Street CRC Rule 1511: *Serve only when required transmitted to Judicial Council. *Chair, Judicial Council of California CRC Rule 1511: *Serve only when required transmitted to Judicial Council. *Chair, Appellate & Trial Court Judicial Services CRC Rule 1511: *Serve only when required transmitted to Judicial Council.	Court Personnel:	
California, County of Los Angeles Coordination Trial Judge 111 N. Hill Street Coordination Trial Judge Los Angeles, CA 90012-3014 By Mail Honorable Jack Komar By Mail Santa Clara County Superior Court Tel: 508/882-2286 191 North First Street, Dept. 17C Fax: 408/882-2293 San Jose, CA 95113 rwalker@scscourt.org Superior Court of California Original Document(s) to be filed at this County of Los Angeles Original Document(s) to be filed at this Stanley Mosk Courthouse—Dept. 1, Rm 534 Interface Los Angeles, CA 90012 CRC Rule 1511: *Serve only when required transmitted to Judicial Council. *Chair, Judicial Council of California CRC Rule 1511: *Serve only when required transmitted to Judicial Council. Attn: Appellate & Trial Court Judicial Services (Civil Case Coordination) CRC Rule 1511: *Serve only when required transmitted to Judicial Council.		CRC Rules 1501(17) and 1540:
111 N. Hill Street Los Angeles, CA 90012-3014 Honorable Jack Komar Santa Clara County Superior Court 191 North First Street, Dept. 17C San Jose, CA 95113 Superior Court of California County of Los Angeles Stanley Mosk Courthouse—Dept. 1, Rm 534 111 North Hill Street Los Angeles, CA 90012 *Chair, Judicial Council of California Administrative Office of the Courts Attn: Appellate & Trial Court Judicial Services (Civil Case Coordination) 455 Golden Gate Avenue	· · ·	
Honorable Jack Komar By Mail Santa Clara County Superior Court Tel: 508/882-2286 191 North First Street, Dept. 17C Fax: 408/882-2293 San Jose, CA 95113 rwalker@scscourt.org Superior Court of California Original Document(s) to be filed at this location. Stanley Mosk Courthouse—Dept. 1, Rm 534 Original Document(s) to be filed at this location. *Chair, Judicial Council of California CRC Rule 1511: *Serve only when required transmitted to Judicial Council. *Chair, Appellate & Trial Court Judicial Services (Civil Case Coordination) CRC Rule 1511: *Serve only when required transmitted to Judicial Council.		
Santa Clara County Superior Court 191 North First Street, Dept. 17C San Jose, CA 95113 Superior Court of California County of Los Angeles Stanley Mosk Courthouse—Dept. 1, Rm 534 111 North Hill Street Los Angeles, CA 90012 *Chair, Judicial Council of California Administrative Office of the Courts Attn: Appellate & Trial Court Judicial Services (Civil Case Coordination) 455 Golden Gate Avenue	Los Angeles, CA 90012-3014	
Santa Clara County Superior Court 191 North First Street, Dept. 17C San Jose, CA 95113 Superior Court of California County of Los Angeles Stanley Mosk Courthouse—Dept. 1, Rm 534 111 North Hill Street Los Angeles, CA 90012 *Chair, Judicial Council of California Administrative Office of the Courts Attn: Appellate & Trial Court Judicial Services (Civil Case Coordination) 455 Golden Gate Avenue	Honorable Leak Komer	By Moil
191 North First Street, Dept. 17C Fax: 408/882-2293 San Jose, CA 95113 rwalker@scscourt.org Superior Court of California Original Document(s) to be filed at this location. Superior Court of California Original Document(s) to be filed at this location. Stanley Mosk Courthouse—Dept. 1, Rm 534 Interfection (Section (Sect		•
San Jose, CA 95113 rwalker@scscourt.org Superior Court of California Original Document(s) to be filed at this County of Los Angeles Stanley Mosk Courthouse—Dept. 1, Rm 534 Stanley Mosk Courthouse—Dept. 1, Rm 534 Interfection (State) Los Angeles, CA 90012 CRC Rule 1511: *Serve only when required transmitted to Judicial Council. *Chair, Judicial Council of California CRC Rule 1511: *Serve only when required transmitted to Judicial Council. *Chair: Appellate & Trial Court Judicial Services (Civil Case Coordination) CRC Rule 1511: *Serve only when required transmitted to Judicial Council.	· ·	
Superior Court of California County of Los Angeles Stanley Mosk Courthouse—Dept. 1, Rm 534 111 North Hill Street Los Angeles, CA 90012 *Chair, Judicial Council of California Administrative Office of the Courts Attn: Appellate & Trial Court Judicial Services (Civil Case Coordination) 455 Golden Gate Avenue		
County of Los Angeles location. Stanley Mosk Courthouse—Dept. 1, Rm 534 location. 111 North Hill Street Los Angeles, CA 90012 *Chair, Judicial Council of California CRC Rule 1511: *Serve only when required transmitted to Judicial Council. *Chair. Appellate & Trial Court Judicial Services CRC Rule 1511: *Serve only when required transmitted to Judicial Council. 455 Golden Gate Avenue Location.		
County of Los Angeles location. Stanley Mosk Courthouse—Dept. 1, Rm 534 location. 111 North Hill Street Los Angeles, CA 90012 *Chair, Judicial Council of California CRC Rule 1511: *Serve only when required transmitted to Judicial Council. *Chair. Appellate & Trial Court Judicial Services CRC Rule 1511: *Serve only when required transmitted to Judicial Council. 455 Golden Gate Avenue Kervices	Superior Court of California	Original Document(s) to be filed at this
111 North Hill Street Los Angeles, CA 90012 *Chair, Judicial Council of California Administrative Office of the Courts Attn: Appellate & Trial Court Judicial Services (Civil Case Coordination) 455 Golden Gate Avenue	County of Los Angeles	location.
Los Angeles, CA 90012 *Chair, Judicial Council of California Administrative Office of the Courts Attn: Appellate & Trial Court Judicial Services (Civil Case Coordination) 455 Golden Gate Avenue		
*Chair, Judicial Council of California Administrative Office of the Courts Attn: Appellate & Trial Court Judicial Services (Civil Case Coordination) 455 Golden Gate Avenue		
Administrative Office of the Courtstransmitted to Judicial Council.Attn: Appellate & Trial Court Judicial Servicestransmitted to Judicial Council.(Civil Case Coordination)455 Golden Gate Avenue	Los Angeles, CA 90012	
Administrative Office of the Courtstransmitted to Judicial Council.Attn: Appellate & Trial Court Judicial Servicestransmitted to Judicial Council.(Civil Case Coordination)455 Golden Gate Avenue	*01 · I · · I 0 · · I C 0 · · ·	
Attn: Appellate & Trial Court Judicial Services (Civil Case Coordination) 455 Golden Gate Avenue	,	
(Civil Case Coordination) 455 Golden Gate Avenue		transmitted to Judicial Council.
455 Golden Gate Avenue		
San Francisco, CA 34102-3000		
	, ,	<u> </u>
Ans.LBMWC.WatSuppl1stAm.XComp.doc – 12 –		_