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Attorneys for Cross-complainants
LITTLEROCK CREEK IRRIGATION DISTRICT, PALM RANCH IRRIGATION DISTRICT, and
Defendants NORTH EDWARDS WATER DISTRICT, DESERT LAKE COMMUNITY SERVICES
DISTRICT, LLANO DEL RIO WATER CO., LLANO MUTUAL WATER CO., BIG ROCK MUTUAL
WATER CO.

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT

Coordinated Proceeding
Special Title (Rule 1550(b))

Judicial Council Coordination No. 4408

ANTELOPE VALLEY GROUNDWATER
CASES

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

Included Actions:

**DECLARATION OF DOLLIE
KOSTOPOULOS IN SUPPORT OF
OPPOSITION TO WOOD CLASS' MOTION
FOR AWARD OF ATTORNEYS' FEES,
COSTS AND INCENTIVE AWARD**

Los Angeles County Waterworks District No. 40
v. Diamond Farming Co. Los Angeles County
Superior Court Case No. BC 325201;

Los Angeles County Waterworks District No. 40
v. Diamond Farming Co., Kern County Superior
Court, Case No. S-1500-CV-234348;

Wm. Bolthouse Farms, Inc. v. City of Lancaster
Diamond Farming Co. v. City of Lancaster v.
Palmdale Water District, Riverside County
Superior Court, Consolidated Actions, Case Nos.
RIC 353840, RIC 344436, RIC 344668

**DATE: April 1, 2016
TIME: 1:30 p.m.
DEPT: TBA**

AND RELATED CROSS-ACTIONS

1 I, DOLLIE KOSTOPOULOS, declare as follows:

2 1. I am the General Manager of North Edwards Water District (herein "District" or
3 "NEWD"), a public water purveyor. I am authorized to make this declaration on behalf of the District. I
4 have worked for North Edwards Water District, a public agency, since 2006.

5 2. I have personal knowledge of the facts set forth herein, and if called to testify, I could and
6 would competently testify thereto. As General Manager, I am familiar with the practices and
7 management of the District, including but not limited to the record-keeping practices of District, the
8 number of connections, type of water use by customers (for example, domestic, irrigation or
9 commercial), the District budget and amount in reserve, and the amount expended by the District on
10 attorneys' fees.

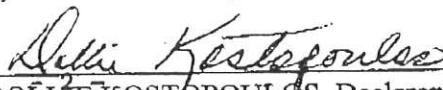
11 3. There are currently 215 connections that receive water service from the District. Of these,
12 all are households. NEWD's most recent budget is \$148,260.00.

13 4. Throughout the 15 years of this litigation, the District spent a total of \$194,698.43 in
14 attorneys' fees. The District was billed at billing rates from between \$170 through \$400 per hour in this
15 case with an average of \$292. The District did not have the financial means to pay for legal fees at a
16 higher rate. If the amount expended on this litigation is broken-down by connection, this comes to an
17 average of approximately \$905.57 expended on this litigation by each connection. This does not include
18 fees for defending this matter through appeal, as well as in connection with the formation and operation
19 of the Watermaster.

20 5. As a public agency, the District cannot operate at a profit but is permitted to have a
21 reserve fund. If the amount requested by the Wood Class were awarded against the District, this would
22 greatly exceed the operating budget and reserve fund, and therefore, the District would have insufficient
23 funds to continue to operate and provide water to the community.

24 I declare under penalty of perjury under the laws of the state of California the foregoing is true.

25 Executed this 14th day of March, 2016, in North Edwards, California.

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27 DOLLIE KOSTOPOULOS, Declarant

27 Wood Atty's Fees Oppo DEC NE, DEC NE

28 **DECLARATION OF DOLLIE KOSTOPOULOS IN SUPPORT OF OPPOSITION TO WOOD CLASS'
MOTION FOR ATTORNEYS' FEES, COSTS AND INCENTIVE AWARD**

1 STATE OF CALIFORNIA,)
2) ss.
3 COUNTY OF VENTURA)

4 I am employed in the County of Ventura, State of California. I am over the age of 18 and not a
5 party to the within action. My business address is 4165 E. Thousand Oaks Blvd., Suite 350, Westlake
6 Village, California 91362.

7 On **March 14, 2016**, I posted the following document(s) to the website <http://www.scefiling.org>, a
8 dedicated link to the Antelope Valley Groundwater Cases, and upon which the parties have agreed this
9 posting constitutes service.

10 **DECLARATION OF DOLLIE KOSTOPOULOS IN SUPPORT OF OPPOSITION TO WOOD**
11 **CLASS' MOTION FOR AWARD OF ATTORNEYS' FEES, COSTS AND INCENTIVE AWARD**

12 By electronically serving through <http://www.scefiling.org>, and addressed to all parties appearing
13 on the <http://www.scefiling.org> electronic service list, the file transmission was reported as complete and
14 a copy of the <http://www.scefiling.org> Filing/Service Receipt will be maintained with a copy of the
15 document in our office.

16 I am readily familiar with the business practice for collection and processing of pleadings and
17 discovery for electronic service with <http://www.scefiling.org>, and that the pleadings and discovery shall
18 be electronically served this same day in the ordinary course of business.

19 I declare under penalty of perjury under the laws of the State of California that the above is true
20 and correct.

21 Executed on March 14, 2016, in Westlake Village, California.

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Kathi Miers