

1 WAYNE K. LEMIEUX (SBN 43501)  
W. KEITH LEMIEUX (SBN 161850)  
2 CHRISTINE CARSON (SBN. 188603)  
LEMIEUX & O'NEILL  
3 4165 E. Thousand Oaks Blvd., Suite 350  
Westlake Village, CA 91362  
4 Telephone: (805) 495-4770  
5 Facsimile: (805) 495-2787

6 Attorneys for Cross-complainants

7 LITTLEROCK CREEK IRRIGATION DISTRICT, PALM RANCH IRRIGATION DISTRICT, and  
8 Defendants NORTH EDWARDS WATER DISTRICT, DESERT LAKE COMMUNITY SERVICES  
DISTRICT, LLANO DEL RIO WATER CO., LLANO MUTUAL WATER CO., BIG ROCK MUTUAL  
WATER CO., QUARTZ HILL WATER DISTRICT

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **IN AND FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

12 Coordinated Proceeding  
Special Title (Rule 1550(b))

) **Judicial Council Coordination No. 4408**

13 ANTELOPE VALLEY GROUNDWATER  
14 CASES

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

15 Included Actions:

) **DECLARATION OF CHAD REED IN**  
) **SUPPORT OF OPPOSITION TO WOOD**  
) **CLASS' MOTION FOR AWARD OF**  
) **ATTORNEYS' FEES, COSTS AND**  
) **INCENTIVE AWARD**

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

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

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

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

24 AND RELATED CROSS-ACTIONS  
25

1 I, CHAD REED, declare as follows:

2 1. I am the General Manager of Quartz Hill Water District (herein "District"), a public water  
3 purveyor. I am authorized to make this declaration on behalf of the District. I have worked for the District,  
4 a public agency, since January 18, 2007.

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 and a long-time employee of the District, I am  
7 familiar with the practices and management of the District, including but not limited to the record-keeping  
8 practices of District, the number of connections, type of water use by customers (for example, domestic,  
9 irrigation or commercial), the District budget and amount in the Emergency Recovery fund, and the  
10 amount expended by the District on attorneys' fees.

11 3. There are currently 5754 connections that receive water service from the District. Of these,  
12 approximately 5615 are households with the remainder being commercial or irrigation use. The District  
13 has an annual operating budget of \$4,284,759. The District has \$1,009,469 in Emergency Recovery.

14 4. Throughout the 10 years of this litigation, the District spent a total of \$1,829,939 in  
15 attorneys' fees. The District was billed at a billing rate of \$300 per hour in this case. The District did not  
16 have the financial means to pay for legal fees at a higher rate. If the amount expended on this litigation is  
17 broken-down by connection, this comes to an average of approximately \$325.90 expended on this  
18 litigation by each connection. This does not include fees for defending this matter through appeal, as well  
19 as in connection with the formation and operation of the Watermaster.

20 5. As a public agency, the District cannot operate at a profit but is permitted to have a reserve  
21 fund. If the amount requested by the Wood Class were awarded against the District, this would greatly  
22 exceed the operating budget and Emergency Recovery, 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 the foregoing is true and correct.

25 Executed this 14 day of March, 2016 in Lancaster, California.

26   
CHAD REED, Declarant

27 Wood AttysFees Oppo DEC QH.DEC.QH

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