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9 Attorneys for Cross-complainants

10 LITTLE ROCK CREEK IRRIGATION DISTRICT, PALM RANCH IRRIGATION DISTRICT, and
11 Defendants NORTH EDWARDS WATER DISTRICT, DESERT LAKE COMMUNITY SERVICES
12 DISTRICT, LLANO DEL RIO WATER CO., LLANO MUTUAL WATER CO., BIG ROCK MUTUAL
13 WATER CO.

14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

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

16 Coordinated Proceeding
17 Special Title (Rule 1550(b))

Judicial Council Coordination No. 4408

18 ANTELOPE VALLEY GROUNDWATER
19 CASES

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

20 Included Actions:

**DECLARATION OF DEANNA LOVE IN
SUPPORT OF OPPOSITION TO WOOD
CLASS' MOTION FOR AWARD OF
ATTORNEYS' FEES, COSTS AND
INCENTIVE AWARD AND IN SUPPORT OF
JOINER IN LOS ANGELES COUNTY
WATERWORKS DISTRICT NO. 40'S
OPPOSITION TO WOOD CLASS' MOTION**

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

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

27 Wm. Bolthouse Farms, Inc. v. City of Lancaster
28 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

**DECLARATION OF DEANNA LOVE IN SUPPORT OF OPPOSITION TO WOOD CLASS' MOTION
FOR ATTORNEYS' FEES, COSTS AND INCENTIVE AWARD AND IN SUPPORT OF JOINER IN
COUNTY WATERWORKS DISTRICT NO. 40'S OPPOSITION TO WOOD CLASS' MOTION**

1 I, DEANNA LOVE, declare as follows:

2 1. I am the Secretary and Treasurer of Desert Lake Community Services District (herein
3 “District” or “DLCSD”), a public water purveyor. I am authorized to make this declaration on behalf of
4 the District. I have worked for the District, a public agency, since 1997.

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 Secretary and Treasurer and a long-time employee of the District,
7 I am familiar with the practices and management of the District, including but not limited to the record-
8 keeping practices of District, the number of connections, type of water use by customers (for example,
9 domestic, irrigation or commercial), the District budget and amount in reserve, and the amount
10 expended by the District on attorneys’ fees. As treasurer, I prepare the budgets and financial reports
11 which the board of directors approves.

12 3. There are currently 249 connections that receive water service from the District. Of these,
13 approximately 240 are households with the remainder being commercial or irrigation use. The District
14 has an annual operating budget of \$252,514. The District has \$190,000.00 in reserve. The District has
15 only 3 employees.

16 4. Throughout the 15 years of this litigation, the District spent a total of \$213,123.47 in
17 attorneys’ fees. The District was billed at billing rates from between \$170 through \$400 per hour in this
18 case with an average of \$290 per hour. The District did not have the financial means to pay for legal fees
19 at a higher rate. If the amount expended on this litigation is broken-down by connection, this comes to
20 an average of approximately \$855.92 expended on this litigation by each connection. This does not
21 include fees for defending this matter through appeal, as well as in connection with the formation and
22 operation of the Watermaster.

23 5. The District has been operating on such a shoe-string budget that at times directors have
24 had to volunteer their time to make repairs in the field because the District does not have sufficient funds
25 in the budget to hire additional staff.

