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12 LV RITTER RANCH LLC

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF LOS ANGELES**

11 ANTELOPE VALLEY
12 GROUNDWATER CASES,

13 Included Actions:

14 Los Angeles County Waterworks District
15 No. 40 v. Diamond Fanning Co.
16 Los Angeles County Superior Court
17 Case No. BC 325201

18 Los Angeles County Waterworks District
19 No. 40 v. Diamond Farming Co.
20 Kern County Superior Court
21 Case No. S-1500-CV -254-348

22 Wm. Bolthouse Farms, Inc. v. City of
23 Lancaster, Diamond Farming Co. v. City
24 of Lancaster, Diamond Fanning Co. v.
25 Palmdale Water Dist.
26 Riverside County Superior Court
27 Consolidated actions
28 Case Nos. RIC 353 840, RIC 344 436,
RIC 344 668

Judicial Council Coordination No. 4408

For filing purposes only:
Case No.: 1-05-CV-049053

Assigned to the Honorable Jack Komar

**RESPONSE BY NON-STIPULATING
PARTY LV RITTER RANCH, LLC TO
THE PROPOSED STIPULATED
JUDGMENT AND PHYSICAL SOLUTION**


1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE LV Ritter Ranch, LLC provides this response to the proposed
3 Stipulated Judgment and Physical Solution under Paragraph 3 of the Court's March 27, 2015 Second
4 Amended Case Management Order. LV Ritter Ranch, LLC is the record owner of the Ritter Ranch
5 property. The Ritter Ranch property is the site of the Ritter Ranch development project, which is
6 substantially within the Antelope Valley Groundwater Basin as previously determined by the Court.
7 Furthermore, the entire Ritter Ranch property drains into the Basin. LV Ritter Ranch, LLC filed a
8 Statement of Claims to Water Rights as Successor to Palmdale Hills Property, LLC in this case on
9 July 12, 2012. The July 2012 Statement of Claims to Water Rights did not make a water right claim
10 based on prior groundwater production. LV Ritter Ranch, LLC is a non-stipulating party and
11 therefore is not an overlying landowner listed on Exhibit 4 of the proposed Stipulated Judgment and
12 Physical Solution.

13 LV Ritter Ranch, LLC does not object to the proposed Stipulated Judgment and Physical
14 Solution, with the understanding that the 'Injunction Against Transportation' from the Basin under
15 Section 6.4 of the proposed Stipulated Judgment and Physical Solution will not apply to any attempt
16 by a Public Water Supplier to serve Basin groundwater to the Ritter Ranch development project.

17
18 DATED: April 7, 2015

EDWARD J. CASEY
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Andrew Brady
Attorneys for Defendant
LV RITTER RANCH LLC

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PROOF OF SERVICE

I, Yolanda S. Ramos, declare:

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is Alston & Bird LLP, 333 South Hope Street, Sixteenth Floor, Los Angeles, CA 90071.

On April 7, 2015, I served the document(s) described as **RESPONSE BY NON-STIPULATING PARTY LV RITTER RANCH, LLC TO THE PROPOSED STIPULATED JUDGMENT AND PHYSICAL SOLUTION** on the interested parties in this action by enclosing the document(s) in a sealed envelope addressed as follows:

BY MAIL: I am "readily familiar" with this firm's practice for the collection and the processing of correspondence for mailing with the United States Postal Service. In the ordinary course of business, the correspondence would be deposited with the United States Postal Service at 333 South Hope Street, Los Angeles, California 90071 with postage thereon fully prepaid the same day on which the correspondence was placed for collection and mailing at the firm. Following ordinary business practices, I placed for collection and mailing with the United States Postal Service such envelope at Alston & Bird LLP, 333 South Hope Street, Los Angeles, California 90071.

BY ELECTRONIC MAIL: By posting the document listed above to the Santa Clara Superior Court website: www.scefiling.org regarding the ANTELOPE VALLEY GROUNDWATER matter.


BY FEDERAL EXPRESS UPS NEXT DAY AIR OVERNIGHT DELIVERY: I deposited such envelope in a facility regularly maintained by FEDERAL EXPRESS UPS Overnight Delivery [specify name of service:] with delivery fees fully provided for or delivered the envelope to a courier or driver of FEDERAL EXPRESS UPS OVERNIGHT DELIVERY [specify name of service:] authorized to receive documents at Alston & Bird LLP, 333 South Hope Street, Los Angeles, California 90071 with delivery fees fully provided for.

BY FACSIMILE: I telecopied a copy of said document(s) to the following addressee(s) at the following number(s) in accordance with the written confirmation of counsel in this action.

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

[Federal] I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 7, 2015, at Los Angeles, California.



YOLANDA S. RAMOS