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LOS ANGELES COUNTY WATERWORKS
6 DISTRICT NO. 40

**EXEMPT FROM FILING FEES
UNDER GOVERNMENT CODE
SECTION 6103**

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COUNTY WATERWORKS DISTRICT NO. 40

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14 SUPERIOR COURT OF THE STATE OF CALIFORNIA
15 COUNTY OF LOS ANGELES – CENTRAL DISTRICT
16

17 **ANTELOPE VALLEY**
18 **GROUNDWATER CASES**
19 Included Actions:
20 Los Angeles County Waterworks District
No. 40 v. Diamond Farming Co., Superior
21 Court of California, County of Los Angeles,
Case No. BC 325201;
22 Los Angeles County Waterworks District
No. 40 v. Diamond Farming Co., Superior
23 Court of California, County of Kern, Case
No. S-1500-CV-254-348;
24 Wm. Bolthouse Farms, Inc. v. City of
25 Lancaster, Diamond Farming Co. v. City of
Lancaster, Diamond Farming Co. v.
26 Palmdale Water Dist., Superior Court of
California, County of Riverside, Case Nos.
27 RIC 353 840, RIC 344 436, RIC 344 668

Judicial Council Coordination No. 4408
CLASS ACTION
Santa Clara Case No. 1-05-CV-049053
Assigned to The Honorable Jack Komar

**OBJECTIONS TO DECLARATIONS AND
STIPULATIONS IN PHASE IV**

28

1 Pursuant to the Court's order at the March 25, 2013 Case Management Conference and the
2 Court's subsequent Amended Case Management Order dated April 29, 2013, Los Angeles
3 Waterworks District No. 40, City of Palmdale, City of Lancaster, Littlerock Creek Irrigation
4 District, Palm Ranch Irrigation District, Palmdale Water District, Quartz Hill Water District,
5 Rosamond Community Services District, and California Water Service Company (collectively,
6 the "Public Water Suppliers") are entering into stipulations, or are in process of negotiating
7 appropriate stipulations, with parties in these coordinated proceedings except as to the parties
8 and/or declarants identified below. The Public Water Suppliers reserve the right to enter into
9 further stipulations or to cross examine individuals or entities not listed here during the Phase
10 Four trial. The Public Water Suppliers object to certain stipulations and/or declarations for
11 reasons stated below.

12 Regarding each declaration or request for stipulation referenced below, the Public Water
13 Supplier rebuttal evidence to rebut the information provided by the parties identified below will
14 be expert testimony, the Summary Expert Report, aerial photographs, LANDSAT images, and the
15 documents produced by the parties identified below.

16
17 John Javadi

- 18 • Paragraphs 2 to 4, (hereinafter, all references to "Paragraph" shall be to paragraphs
19 of the Declaration or Stipulation at issue), Paragraphs 23 to 26, and Paragraphs 36
20 to 42. The information provided does not support the claimed water use; the
21 declaration is also unclear or provide insufficient information regarding acreage,
22 irrigated acreage, pump tests, electric records, method of calculations, crop type,
23 crop duty, irrigation practice, water use, and calculation of applied water use.

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25 Mark Beuhler, Declaration dated January 31, 2013

- 26 • Paragraphs 2 to 7, and 9 to 13. The information is unclear or insufficient regarding
27 acreage, lease, and ownership;
- 28 • Paragraphs 1 to 4 under Crop Duties and Irrigated Acres. The information is

1 unclear or insufficient regarding crop type, irrigated acreage and gross acreage;

- 2 • Paragraphs 6 to 9 under Use of Water. The information is unclear or insufficient
3 regarding method of calculation, crop type, and irrigated acreage; and
4 • Information provided does not support the claimed water use.

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6 Mark Beuhler, Supplemental Declaration dated April 11, 2013

- 7 • Entire supplemental declaration. The supplemental declaration was untimely, and
8 was not posted onto the website until April 12, 2013; information provided does
9 not support the claimed water use; the information is unclear or insufficient
10 regarding acreage, lease, ownership, crop type, irrigated acreage, water use, and
11 calculation of applied water use.

12
13 Rod Stiefvater

- 14 • Paragraphs 33 to 34, and Paragraphs 41 to 42. The information provided does not
15 support the claimed water use or calculation of applied water use; the declaration
16 is also unclear or provide insufficient information regarding acreage, irrigated
17 acreage, method of calculations, crop type, crop duty, irrigation practice, water
18 use, and calculation of applied water use.

19
20 Keith Latham

- 21 • Paragraphs 2 to 7, Paragraphs 19 to 20, and Paragraphs 41 to 43. The information
22 provided does not support the claimed water use or calculation of water use; the
23 declaration is also unclear or provide insufficient information regarding acreage,
24 water meter records, method of calculations, water use, and calculation of applied
25 water use.

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27 Richard Nelson

- 28 • Objection as to the entire declaration because applied water duty stated in the

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stipulation is contrary to the applied water duty admitted into evidence at the Phase 3 trial and upon which the court determined safe yield.

- The declaration is also unclear or provides insufficient information regarding crop type, irrigated acreage, other sources of water, water use, and method of calculation.

Saint Andrews Abbey, Inc.

- Entire stipulation. The information supplied does not support claimed water use.
- The stipulation is also unclear or provides insufficient information regarding water use and method of calculation.

Craig Van Dam

- Entire declaration. The information supplied does not support claimed water use; the information is unclear or insufficient regarding ownership, leases, parcel division, gross acreage, irrigated acreages, method of calculation, crop type, crop duty, water meter records, pump tests, electric records, other sources of water, water use, and, calculation of applied water use

Gary Van Dam

- Paragraphs 2 to 7, Paragraphs 23 to 25, Paragraphs 28 to 29, and Paragraphs 33 to 34. The information supplied does not support claimed water use; the information is unclear or insufficient regarding ownership, parcel division, acreage, electric records and pump test, diesel records and pump test, other sources of water; method of calculation, crop types, crop duty, irrigated acreage, gross acreage, water use, and calculation of applied water use.

Gene Bahlman

- Paragraph 2, Paragraph 4, Paragraphs 19 to 20, and Paragraphs 36 to 42. The

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information supplied does not support claimed water use; the information is unclear or insufficient regarding ownership, parcel size, water meter records, method of calculation, crop types, crop duty, irrigated acreage, gross acreage, water use, and calculation of applied water use.

David Dorrance

- Entire declaration. The information supplied does not support claimed water use; the information is unclear or insufficient regarding parcel size, irrigated acreages, ownership, leases, water rights to leased parcels, water meter, state water project purchases, pump test and electrical records, pump test and diesel records, method of calculation, crop type, crop duty, irrigated acreage, water use, and calculation of applied water use.

Jane Healy

- Paragraphs 2 and 4 to 7, Paragraphs 33 and 34, and Paragraphs 36 to 40. The applied water duty stated in the declaration is contrary to the applied water duty admitted into evidence at the Phase 3 trial and upon which the court determined safe yield; the information is unclear or insufficient regarding parcel size, crop type, crop duty, irrigated acres, method of calculation, water use, and calculation of applied water use;
- Paragraph 33 refers to water use by Triple M Property, with whom Ms. Healy has no affiliation; and
- Ms. Healy admitted in her deposition that she did not review the completed declaration before she signed her declaration and did not know where the information in her declaration came from.

Healy Farms

- Entire Ex Parte Application of Stipulation for Approval of Stipulation. No

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stipulation or declaration was submitted; see objections to Declaration of Jane Healy.

Richard Miner

- Entire declaration. The applied water duty stated in the declaration is contrary to the applied water duty admitted into evidence at the Phase 3 trial and upon which the court determined safe yield; the information is unclear or insufficient regarding parcel size, crop type, crop duty, irrigated acres, method of calculation, water use, and calculation of applied water use.

Richard and Michael Nelson

- Entire Ex Parte Application of Stipulation for Approval of Stipulation. No stipulation or declaration was submitted other than Richard Nelson’s declaration regarding Willow Springs Company; see objections to Declaration of Richard Nelson.

John B. Reca

- Entire declaration. The applied water duty stated in the declaration is contrary to the applied water duty admitted into evidence at the Phase 3 trial and upon which the court determined safe yield; the information is unclear or insufficient regarding ownership, leases, parcel size, groundwater rights to leased parcels, crop type, crop duty, irrigated acres, method of calculation, water use, and calculation of applied water use.

Adrienne Reca

- Entire Ex Parte Application of Stipulation for Approval of Stipulation. No stipulation or declaration was submitted; see objections to Declaration of John B. Reca.

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Mabel Selak

- Entire declaration. The applied water duty used is contrary to the applied water duty admitted into evidence at the Phase 3 trial and upon which the court determined safe yield; the information is unclear or insufficient regarding ownership, parcel size, irrigated acreage, crop type, crop duty, meter record, pump test, method of calculation, water use, and calculation of applied water use.

Jeffrey and Nanacee Siebert

- Entire declaration. The applied water duty used is contrary to the applied water duty admitted into evidence at the Phase 3 trial and upon which the court determined safe yield; the information supplied does not support claimed water use; the information is unclear or insufficient regarding ownership, parcel size, irrigated acreage, crop type, crop duty, meter record, pump test, method of calculation, water use, and calculation of applied water use.

Lee and Donna Wilson

- Entire declaration. The information supplied does not support claimed water use; the information is unclear or insufficient regarding ownership, parcel size, irrigated acreage, water use, and calculation of applied water use.

Samuel Kremen

- Entire declaration. The applied water duty used is contrary to the applied water duty admitted into evidence at the Phase 3 trial and upon which the court determined safe yield; the information supplied does not support claimed water use; the information is unclear or insufficient regarding ownership, parcel size, irrigated acreages, leases, water rights to leased parcels, water meter records, pump test and electrical records, pump test and diesel records, method of calculation,

1 crop type, crop duty, irrigated acreage, water use, and calculation of applied water
2 use.

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4 Tierra Bonita Ranch Company

- 5 • See objections to Declaration of Samuel Kremen.

6

7 Vera Nelson

- 8 • Paragraphs 4 to 6. For the years 2000 and 2001, the applied water duty used is
9 contrary to the applied water duty admitted into evidence at the Phase 3 trial and
10 upon which the court determined safe yield; the information supplied does not
11 support claimed water use; the information is unclear or insufficient regarding
12 water use, and calculation of applied water use.

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14 John Calandri

- 15 • Paragraphs 2 to 17, Paragraphs 21 to 26, Paragraphs 28 to 31, Paragraphs 33 to 34,
16 and Paragraphs 36 to 42. The applied water duty stated in the declaration is
17 contrary to the applied water duty admitted into evidence at the Phase 3 trial and
18 upon which the court determined safe yield; the information supplied does not
19 support claimed water use; the information is unclear or insufficient regarding
20 ownership, acreage, leases, groundwater rights to leased parcels, crop type, co-
21 efficient, state water project purchases, method of calculation, pump test, electric
22 records, diesel record, crop type, irrigated acreage, crop duty, water use and
23 calculation of applied water use.

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25 B.J. Calandri

- 26 • See objections to Declaration of John Calandri; no stipulation or declaration was
27 submitted; insufficient information provided regarding ownership, parcels, water
28 use, and calculation of applied water use.

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John and B.J. Calandri 2001 Trust

- See objections to Declaration of John Calandri; no stipulation or declaration was submitted; insufficient information provided regarding ownership, parcels, water use, and calculation of applied water use.

Son Rise Farms

- See objections to Declaration of John Calandri.

William Taylor

- Entire declaration. The information supplied does not support claimed water use; the information is unclear or insufficient regarding ownership, parcel size, water use, and calculation of applied water use.

Steve McCracken

- Did not submit a declaration.

Bruce Nelson

- Exhibit E – Water from “extraction wells” was not beneficially used.
- Exhibit O – Water is not from groundwater basin.
- Paragraph 42 – includes water from “extraction wells” not beneficially used.

Thomas M. Bookman

- Paragraph 4, Paragraphs 23 to 27, Paragraphs 33 to 34, and Paragraphs 36 to 42. The applied water duty used is contrary to the applied water duty admitted into evidence at the Phase 3 trial and upon which the court determined safe yield; the information is unclear or insufficient regarding parcel size, electric records and pump tests, crop type, crop duty, irrigated acres, method of calculation, irrigation

1 practices, water use, and calculation of applied water use.

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3 Aleks Baharlo

- 4 • Paragraph 2, Paragraphs 4 to 7, Paragraphs 33 to 34, and Paragraphs 36 to 40. The
5 information supplied does not support claimed water use; the information is
6 unclear or insufficient regarding ownership, parcel size, irrigated acreage, water
7 use and calculation of applied water use.

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9 Robert Gorrindo

- 10 • Paragraph 2, Paragraphs 4 to 12, Paragraphs 33 to 34, and Paragraphs 39 to 42.
11 The applied water duty used is contrary to the applied water duty admitted into
12 evidence at the Phase 3 trial and upon which the court determined safe yield; the
13 information supplied does not support claimed water use; the information is
14 unclear or insufficient regarding ownership, parcel size, irrigated acreages, leases,
15 water rights to leased parcels, method of calculation, crop type, crop duty, water
16 use, and calculation of applied water use.

17
18 Phillip Gorrindo

- 19 • Entire Ex Parte Application of Stipulation for Approval of Stipulation. No
20 stipulation or declaration was submitted; see objections to Declaration of Robert
21 Gorrindo.

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23 Gorrindo Family Trust/Gorrindo Resourceful, LLC

- 24 • See objections to Declaration of Robert Gorrindo.

25
26 Jim Nye

- 27 • Entire declaration. The applied water duty used is contrary to the applied water
28 duty admitted into evidence at the Phase 3 trial and upon which the court

1 determined safe yield; the information supplied does not support claimed water
2 use; the information is unclear or insufficient regarding relationship between
3 declarant and owner of property, ownership, parcel size, irrigated acreages,
4 method of calculation, crop type, crop duty, water use, and calculation of applied
5 water use.

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7 Julie Kyle (on behalf of Gailen and Julie Kyle)

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- 9 • Paragraphs 2 and 4, Paragraphs 8 to 18, Paragraphs 23 to 25, Paragraphs 33 to 34,
10 and Paragraphs 36 to 42. The applied water duty used is contrary to the applied
11 water duty admitted into evidence at the Phase 3 trial and upon which the court
12 determined safe yield; the information supplied does not support claimed water
13 use; the information is unclear or insufficient regarding ownership, parcel size,
14 leases, groundwater rights related to leased parcels, pump tests and electric
15 records, irrigated acreages, crop type, crop duty, water use, and calculation of
16 applied water use.

17 Kyle Trust, James Kyle, Kyle Family Trust, Julia Kyle, and Wanda Kyle

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- 19 • Entire Ex Parte Application of Stipulation for Approval of Stipulation. No
20 stipulation or declaration was submitted; see objections to Declaration of Julie
21 Kyle.

22 Stipulation of John Maritorena, and Declaration of Jose Maritorena, Marie Maritorena,
23 and Jean Pierre Maritorena

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- 25 • Entire stipulation and declaration. The information supplied does not support
26 claimed water use; the information is unclear or insufficient regarding ownership,
27 leases, groundwater to leased parcels, parcel size, irrigated acreages, method of
28 calculation, state water project purchases, electric records and pump tests, diesel
records and pump test, crop type, crop duty, water use, and calculation of applied

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water use.

Maritorena Living Trust

- See objections to objections to Declarations of John Maritorena, and Declaration of Jose Maritorena, Marie Maritorena, and Jean Pierre Maritorena.

Robert Jones

- Paragraphs 2 to 4, Paragraph 6, Paragraphs 8 to 18, Paragraphs 23, Paragraph 29, Paragraphs 33 and 34, and Paragraphs 36 to 42. The applied water duty used is contrary to the applied water duty admitted into evidence at the Phase 3 trial and upon which the court determined safe yield; the information supplied does not support claimed water use; the information is unclear or insufficient regarding ownership, parcel size, leases, groundwater rights to leased parcels, irrigated acreages, method of calculation, pump tests and electric records, pump tests and diesel records, crop type, crop duty, water use, and calculation of applied water use.

Michael Smith

- Paragraph 2, Paragraphs 4 to 7, Paragraphs 13 to 15, Paragraph 19, and Paragraphs 20 to 26. The information supplied does not support claimed water use; the information is unclear or insufficient regarding ownership, leases, groundwater to leased parcels, parcel size, irrigated acreages, method of calculation, crop type, crop duty, water use, and calculation of applied water use.

Robert Bowcock

- Paragraphs 8 to 11 of Mr. Bowcock’s declaration for Palmdale. The information supplied does not support claimed water use.
- Paragraphs 10 and 11 of Mr. Bowcock’s declaration for Big Rock. The

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information supplied relates to possible future production, not current production.

- Paragraph 12 of Mr. Bowcock’s declaration for Big Rock. The information supplied does not relate to the Antelope Valley.

Tracy Saiki

- Entire declaration. The information supplied does not support Bolthouse Properties, LLC’s claimed water use; the information is unclear or insufficient regarding ownership, parcel size leases, groundwater to leased parcels, parcel size, irrigated acreages, water use, and calculation of applied water use.

Bolthouse Properties, LLC (Declaration of Anthony Leggio)

- Declaration, addendum to declaration, and stipulation in their entirety. The information supplied does not support claimed water use; the information is unclear or insufficient regarding acreage, ownership, parcel size, leases, groundwater rights to leased parcels, method of calculation, water pump records, crop type, irrigated acreage, water use, and calculation of applied water use.

Eugene B. Nebeker

- Entire declaration. The applied water duty used is contrary to the applied water duty admitted into evidence at the Phase 3 trial and upon which the court determined safe yield; the information supplied does not support claimed water use; the information is unclear or insufficient regarding ownership, parcel size, irrigated acreages, pump tests and electric records, method of calculation, crop type, crop duty, other sources of water, water use, and calculation of applied water use.

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Diamond Farming Company, Crystal Organic Farms, Grimmway Enterprises, Inc., and
Lapis Land Company, LLC

- Entire stipulation. The information is unclear or insufficient regarding ownership, parcel size, irrigated acreages, method of calculation, water meter records, water use, and calculation of applied water use.

William and Julie Barnes

- Entire Ex Parte Application of Stipulation for Approval of Stipulation. No stipulation or declaration was submitted; insufficient information provided regarding ownership, parcels, water use, and calculation of applied water use.

William R. Barnes & Eldora M. Barnes Family Trust of 1989

- Entire Ex Parte Application of Stipulation for Approval of Stipulation. No stipulation or declaration was submitted; insufficient information provided regarding ownership, parcels, water use, and calculation of applied water use.

Calmat Land Company

- Entire Ex Parte Application of Stipulation for Approval of Stipulation. See objections to Declarations of Robert Bowcock.

Consolidated Rock Products

- Entire Ex Parte Application of Stipulation for Approval of Stipulation. See objections to Declarations of Robert Bowcock.

Beverly Tobias

- Entire Ex Parte Application of Stipulation for Approval of Stipulation. No stipulation or declaration was submitted; insufficient information provided regarding ownership, parcels, water use, and calculation of applied water use.

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Sheldon Blum

- Both declarations in their entirety. The information supplied does not support claimed water use; the information is unclear or insufficient regarding ownership, parcel, leases, groundwater rights to leased parcels, water use, and calculation of applied water use.

Michael Bass

- All declarations in their entirety. The information supplied does not support claimed water use; the information is unclear or insufficient regarding ownership, parcel size, irrigated acreage, crop type, crop duty, water use, and calculation of applied water use.

eSolar, Inc., Sierra SunTower, Tumbleweed SunTower, and Red Dawn SunTower

- See objections to Declarations of Michael Bass.

SGS Antelope Valley Development LLC

- Entire stipulation. The information is unclear or insufficient regarding ownership, parcel size, irrigated acreage, water use, and calculation of applied water use.

Sempra Energy

- See objections for SGS Antelope Valley Development LLC.

Efren Chavez

- Entire declaration. The information supplied does not support claimed water use; the information is unclear or insufficient regarding ownership, parcel size, irrigated acreage, crop duty, crop type, water use, and calculation of applied water use.

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Luz Chavez

- Entire Ex Parte Application of Stipulation for Approval of Stipulation. No stipulation or declaration was submitted; see objections to Declaration of Efren Chavez.

Steven G. Godde

- Entire declaration. The information supplied does not support claimed water use; the information is unclear or insufficient regarding ownership, parcel size, irrigated acreage, crop duty, crop type, water use, and calculation of applied water use

Lawrence A. Godde

- Entire Ex Parte Application of Stipulation for Approval of Stipulation. No stipulation or declaration was submitted; insufficient information provided regarding ownership, parcels, water use, and calculation of applied water use.

Lawrence A. Godde and Godde Trust

- Entire Ex Parte Application of Stipulation for Approval of Stipulation. No stipulation or declaration was submitted; insufficient information provided regarding ownership, parcels, water use, and calculation of applied water use.

Billie and Randall Dickey

- Entire declaration. The information is unclear or insufficient regarding ownership, parcel size, and claimed rights to water.

Mat Havens

- Entire declaration. The information supplied does not support Antelope Valley

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Joint Union High School District’s claimed water use; the information is unclear or insufficient regarding ownership, parcel size, water meter records, other sources of water, water use, and calculation of applied water use.

Connie Cardile

- Paragraphs 2 to 7, Paragraphs 23 to 27, Paragraphs 33 to 34, and Paragraphs 36 to 42. Information is unclear or insufficient regarding ownership, parcel size, irrigated acreage, pump tests and electric records, crop type, crop duty, water use and calculation of applied water use.

Sal Cardile

- Entire Ex Parte Application of Stipulation for Approval of Stipulation. No stipulation or declaration was submitted; insufficient information provided regarding ownership, parcels, water use, and calculation of applied water use; see objections to Declaration of Connie Cardile.

Terry Munz

- Paragraphs 2 to 7, Paragraphs 23 to 27, Paragraphs 33 to 34, and Paragraphs 36 to 42. Information is unclear or insufficient regarding ownership, parcel size, irrigated acreage, crop type, crop duty, water use and calculation of applied water use.

Barry S. Munz

- Entire Ex Parte Application of Stipulation for Approval of Stipulation. No stipulation or declaration was submitted; insufficient information provided regarding ownership, parcels, water use, and calculation of applied water use; see objections to Declaration of Terry Munz.

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Kathleen M. Munz

- Entire Ex Parte Application of Stipulation for Approval of Stipulation. No stipulation or declaration was submitted; insufficient information provided regarding ownership, parcels, water use, and calculation of applied water use; see objections to Declaration of Terry Munz.

Don Bartz

- Entire declaration, except Paragraph 10. The information supplied does not support claimed water use; the information is unclear or insufficient regarding pump tests, water use, and calculation of applied water use.

Phelan Pinon Hills Community Services District

- Entire stipulation, except Paragraphs 5 and 6. The information supplied does not support claimed water use; the information is unclear or insufficient regarding pump tests, water use, and calculation of applied water use.

Antelope Valley East-Kern Water Agency (Declarations of Thomas Barnes, Dan Flory, Michael Flood, Dr. Hong-lie Qiu, and Dwayne Chisam)

- Public Water Suppliers generally object to these declarations in their entirety.

City of Los Angeles/LAWA (Declarations of Vivian Howell and Robert Wagner)

- Public Water Suppliers generally object to these declarations in their entirety.

County Sanitation Districts of Los Angeles County Nos. 14 & 20 (Declaration of Raymond Tremblay)

- Public Water Suppliers generally object to declaration of Raymond Tremblay in its entirety.

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Antelope Park Mutual Water Company, Inc.

- Entire stipulation. The information supplied does not support claimed water use; the information is unclear or insufficient regarding pump tests, meter records, water use, and calculation of applied water use.

Aqua J Mutual Water Company, Inc.

- Entire stipulation. The information supplied does not support claimed water use; the information is unclear or insufficient regarding pump tests, meter records, water use, and calculation of applied water use.

Averydale Mutual Water Company, Inc.

- Entire stipulation. The information supplied does not support claimed water use; the information is unclear or insufficient regarding pump tests, meter records, water use, and calculation of applied water use.

Baxter Mutual Water Company, Inc.

- Entire stipulation. The information supplied does not support claimed water use; the information is unclear or insufficient regarding pump tests, meter records, water use, and calculation of applied water use.

Bleich Flat Mutual Water Company, Inc.

- Entire stipulation. The information supplied does not support claimed water use; the information is unclear or insufficient regarding pump tests, meter records, water use, and calculation of applied water use.

Colorado Mutual Water Company

- Entire stipulation. The information supplied does not support claimed water use; the information is unclear or insufficient regarding pump tests, electric records,

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water use, and calculation of applied water use.

El Dorado Mutual Water Company

- Entire stipulation. The information supplied does not support claimed water use; the information is unclear or insufficient regarding pump tests, electric records, water use, and calculation of applied water use.

Evergreen Mutual Water Company

- Entire stipulation. The information supplied does not support claimed water use; the information is unclear or insufficient regarding pump tests, electric records, water use, and calculation of applied water use.

Land Projects Mutual Water Company, Inc.

- Entire stipulation. The information supplied does not support claimed water use; the information is unclear or insufficient regarding pump tests, electric records, water use, and calculation of applied water use.

Landale Mutual Water Company, Inc.

- Entire stipulation. The information supplied does not support claimed water use; the information is unclear or insufficient regarding pump tests, electric records, water use, and calculation of applied water use.

Shadow Acres Mutual Water Company, Inc.

- Entire stipulation. The information supplied does not support claimed water use; the information is unclear or insufficient regarding pump tests, electric records, water use, and calculation of applied water use.

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Sundale Mutual Water Company, Inc.

- Entire stipulation. The information supplied does not support claimed water use; the information is unclear or insufficient regarding pump tests, electric records, water use, and calculation of applied water use.

Sunnyside Farms Mutual Water Company, Inc.

- Entire stipulation. The information supplied does not support claimed water use; the information is unclear or insufficient regarding pump tests, electric records, water use, and calculation of applied water use.

Tierra Bonita Mutual Water Company, Inc.

- Entire stipulation. The information supplied does not support claimed water use; the information is unclear or insufficient regarding pump tests, electric records, water use, and calculation of applied water use.

West Side Park Mutual Water Company, Inc.

- Entire stipulation. The information supplied does not support claimed water use; the information is unclear or insufficient regarding meter records, water use, and calculation of applied water use.

White Fence Farms Mutual Water Company, Inc.

- Entire stipulation. The information supplied does not support claimed water use; the information is unclear or insufficient regarding pump tests, electric records, water use, and calculation of applied water use.

Boron Community Service District (Declaration of Peter Lopez, Supplemental Declaration of Peter Lopez, and [Proposed] Stipulation)

- Declaration, Supplemental Declaration, and stipulation in their entirety. The

1 information supplied does not support claimed water use; the information is
2 unclear or insufficient regarding meter records, water purchases, water use, and
3 calculation of applied water use.
4

5 Lawrence J. Schilling, Declaration dated April 15, 2013

- 6 • Entire declaration. The declaration was untimely, and was not served until April
7 15, 2013; information provided does not support the claimed water use; the
8 information is unclear or insufficient regarding ownership, parcel size, hour meter
9 and pump performance data, water use, and calculation of applied water use.
10

11 Yogesh Radia

- 12 • Entire declaration. The information provided does not support the claimed water
13 use; the information is unclear or insufficient regarding ownership, parcel size,
14 irrigated acreage, leases, groundwater rights to leased parcels, crop type, crop
15 duty, water use, and calculation of applied water use.
16

17 Bruce Burrows (on behalf of Bruce Burrows and 300 A 40 H LLC)

- 18 • Entire declaration. The information provided does not support the claimed water
19 use; the information is unclear or insufficient regarding ownership, parcel size,
20 irrigated acreage, leases, groundwater rights to leased parcels, crop type, crop
21 duty, water use, and calculation of applied water use.
22

23 Leah Metzger

- 24 • Entire declaration. The information is unclear or insufficient regarding ownership,
25 parcel size, leases, irrigated acreage, and water use.
26

27 Sheep Creek Water Company

- 28 • Public Water Suppliers generally objects to the stipulation in its entirety.

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Don Bartz’s Supplemental Declaration

- The entire supplemental declaration. The supplemental declaration was untimely, and was not served until April 23, 2013. The information supplied does not support claimed water use; the information is unclear or insufficient regarding pump tests, water use, and calculation of applied water use.

John Calandri Declaration re Property Owned by Landinv, Inc.

- Entire declaration. The declaration was untimely, and was not served until April 23, 2013. The information supplied does not support claimed water use; the information is unclear or insufficient regarding ownership, acreage, leases, groundwater rights to leased parcels, crop type, irrigated acreage, crop duty, water use and calculation of applied water use.

Addendum Exhibits E-1 Through E-4 to Declaration of Anthony L Leggio

- The entire addendum. The addendum was untimely, and was not served until May 1, 2013. The information supplied does not support claimed water use; the information is unclear or insufficient regarding pump records, pump tests, crop type, irrigated acreage, crop duty, water use and calculation of applied water use.

Stipulation Between Tejon Ranchcorp, Tejon Ranch Company, Granite Construction, Diamond Farming Company, Crystal Organic Farms, Grimmway Enterprises, Inc., and Lapis Land Company LLC

- The entire stipulation. The stipulation was untimely, and was not served until May 1, 2013. The information supplied does not support claimed water use. The information is unclear or insufficient regarding ownership, parcel size, leases, irrigated acreage, water use, and calculation of applied water use.

1 Notwithstanding the objections stated above, the Public Water Suppliers will continue to
2 work with the parties to enter into stipulations before trial.

3
4 Dated: May 3, 2013

BEST BEST & KRIEGER LLP

5
6 By Jeffrey V. Dunn/w.w.
7 ERIC L. GARNER
8 JEFFREY V. DUNN
9 STEFANIE D. HEDLUND
Attorneys for Cross-Complainant
LOS ANGELES COUNTY
WATERWORKS DISTRICT NO. 40

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Dated: May 3, 2013

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25 By _____
26 JAMES L. MARKMAN
27 STEVEN ORR
Attorneys for Cross-Defendant
CITY OF PALMDALE
28

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Dated: May 3, 2013

BEST BEST & KRIEGER LLP

By _____
ERIC L. GARNER
JEFFREY V. DUNN
STEFANIE D. HEDLUND
Attorneys for Cross-Complainant
LOS ANGELES COUNTY
WATERWORKS DISTRICT NO. 40

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Dated: May 3, 2013

By  _____
JAMES L. MARKMAN
STEVEN ORR
Attorneys for Cross-Defendant
CITY OF PALMDALE

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Dated: May 3, 2013

By Douglas Evertz (w.u.)
DOUGLAS J. EVERTZ
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Dated: May 3, 2013

By _____
WAYNE LEMIEUX
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LITTLE ROCK CREEK IRRIGATION
DISTRICT AND PALM RANCH
IRRIGATION DISTRICT

Dated: May 3, 2013

By _____
THOMAS BUNN III
Attorneys for Cross-Defendant
PALMDALE WATER DISTRICT

Dated: May 3, 2013

By _____
BRADLEY T. WEEKS
Attorneys for Cross-Defendant
QUARTZ HILL WATER DISTRICT

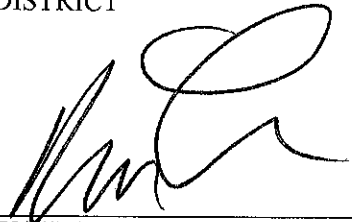
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Dated: May 3, 2013

By _____
DOUGLAS J. EVERTZ
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CITY OF LANCASTER AND
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DISTRICT

Dated: May 3, 2013

By  _____
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IRRIGATION DISTRICT

Dated: May 3, 2013

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PALMDALE WATER DISTRICT

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By Thomas D. Bunn III
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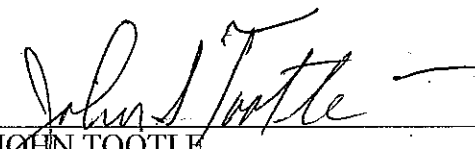
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Dated: May 3, 2013

By 

JOHN TOOTLE
Attorneys for Cross-Defendant
CALIFORNIA WATER SERVICE
COMPANY

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