

1 BEST BEST & KRIEGER LLP
ERIC L. GARNER, Bar No. 130665
2 JEFFREY V. DUNN, Bar No. 131926
WENDY Y. WANG, Bar No. 228923
3 18101 VON KARMAN AVENUE, SUITE 1000
IRVINE, CALIFORNIA 92612
4 TELEPHONE: (949) 263-2600
TELECOPIER: (949) 260-0972
5 Attorneys for LOS ANGELES COUNTY
WATERWORKS DISTRICT NO. 40

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

6 OFFICE OF COUNTY COUNSEL
7 COUNTY OF LOS ANGELES
JOHN F. KRATTLI, Bar No. 82149
8 COUNTY COUNSEL
WARREN WELLEN, Bar No. 139152
9 PRINCIPAL DEPUTY COUNTY COUNSEL
500 WEST TEMPLE STREET
10 LOS ANGELES, CALIFORNIA 90012
TELEPHONE: (213) 974-8407
11 TELECOPIER: (213) 687-7337
Attorneys for LOS ANGELES COUNTY
12 WATERWORKS DISTRICT NO. 40

13 [See Next Page For Additional Counsel]

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

16 ANTELOPE VALLEY GROUNDWATER
17 CASES

18 Included Actions:
19 Los Angeles County Waterworks District No.
40 v. Diamond Farming Co., Superior Court of
20 California, County of Los Angeles, Case No.
BC 325201;

21 Los Angeles County Waterworks District No.
40 v. Diamond Farming Co., Superior Court of
22 California, County of Kern, Case No. S-1500-
CV-254-348;

23 Wm. Bolthouse Farms, Inc. v. City of
Lancaster, Diamond Farming Co. v. City of
24 Lancaster, Diamond Farming Co. v. Palmdale
Water Dist., Superior Court of California,
25 County of Riverside, Case Nos. RIC 353 840,
RIC 344 436, RIC 344 668

26 RICHARD WOOD, on behalf of himself and
27 all other similarly situated v. A.V. Materials,
Inc., et al., Superior Court of California,
28 County of Los Angeles, Case No. BC509546

Judicial Council Coordination Proceeding
No. 4408

CLASS ACTION

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

DECLARATION OF WENDY Y. WANG
RE PUBLIC WATER SUPPLIERS'
NOTICE AND *EX PARTE* APPLICATION
TO EXTEND DATE TO RESPOND TO
PHASE 6 DISCOVERY ORDER

Date: April 4, 2014
Time: 9:00 a.m.
Dept.: Telephonic via CourtCall

[Filed concurrently with [Proposed] Order]

1 MURPHY & EVERTZ LLP
Douglas J. Evertz, Bar No. 123066
2 650 Town Center Drive, Suite 550
Costa Mesa, CA 92626
3 (714) 277-1700; (714) 277-1777 fax
Attorneys for City of Lancaster and Rosamond
4 Community Services District

5 LEMIEUX & O'NEILL
Wayne Lemieux, Bar No. 43501
6 4165 E. Thousand Oaks Blvd., Ste. 350
Westlake Village, CA 91362
7 (805) 495-4770; (805) 495-2787 fax
Attorneys for Littlerock Creek Irrigation District,
8 Palm Ranch Irrigation District, Desert Lake Community Services District, North Edwards Water
District, Llano Del Rio Water Company, Llano Mutual Water Company, and Big Rock Mutual
9 Water Company

10 LAGERLOF SENEAL GOSNEY & KRUSE
Thomas Bunn III, Bar No. 89502
11 301 North Lake Avenue, 10th Floor
Pasadena, CA 91101-4108
12 (626) 793-9400; (626) 793-5900 fax
Attorneys for Palmdale Water District

13 CHARLTON WEEKS LLP
14 Bradley T. Weeks, Bar No. 173745
1007 West Avenue M-14, Suite A
15 Palmdale, CA 93551
(661) 265-0969; (661) 265-1650 fax
16 Attorneys for Quartz Hill Water District

17 CALIFORNIA WATER SERVICE COMPANY
John Tootle, Bar No. 181822
18 2632 West 237th Street
Torrance, CA 90505
19 (310) 257-1488; (310) 325-4605-fax

20

21

22

23

24

25

26

27

28

DECLARATION OF WENDY Y. WANG

I, Wendy Y. Wang, declare as follows:

1. I have personal knowledge of the facts below, and if called upon to do so, I could testify competently thereto in a court of law.

2. I am licensed to practice law in the State of California and am an attorney of Best, Best & Krieger LLP, attorneys of record for the Los Angeles County Waterworks District No. 40 (“District No. 40”).

3. My office tried to log-in to the court’s designated website for online filing at or around 9:45 a.m. on April 13, 2014. I and another member of my firm made multiple attempts to log-in to the website. At or around 9:52 a.m., I called Glotrans regarding the difficulties that we encountered accessing the court’s website. I also emailed the *ex parte* papers the Public Water Suppliers intended to file to Glotrans.

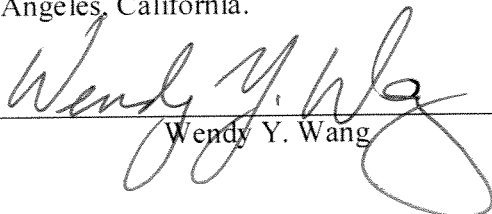
4. I was informed by Daniele Rossdeutcher of Glotrans that there is a systematic problem with the website and no one can log-in and post documents to the website. Attached as Exhibit “A” is a true and correct copy of an email I received from Ms. Rossdeutscher regarding the “system outage.”

5. Shortly thereafter, I asked Thomas Bunn to serve the *ex parte* papers by email to counsel of active parties. Attached as Exhibit “B” is a true and correct copy of the email sent by Mr. Bunn at 10:16 a.m.

6. At or around 10:45 a.m. today, I received notification that Glotrans had posted the *ex parte* papers on behalf of our firm.

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

Executed this 3rd day of April, 2014, at Los Angeles, California.


Wendy Y. Wang

LAW OFFICES OF
BEST BEST & KRIEGER LLP
18101 VON KARMAN AVENUE, SUITE 1000
IRVINE, CALIFORNIA 92612

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE

I, Sandra K. Sandoval, declare:

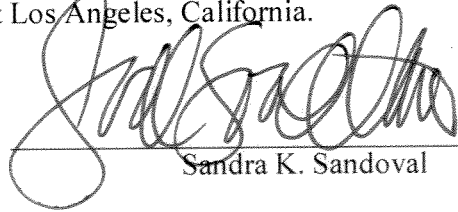
I am a resident of the State of California and over the age of eighteen years, and not a party to the within action; my business address is Best Best & Krieger LLP, 300 South Grand Avenue, 25th Floor, Los Angeles, CA 90071. On April 3, 2014, I served the within document(s):

DECLARATION OF WENDY Y. WANG RE PUBLIC WATER SUPPLIERS' NOTICE AND EX PARTE APPLICATION TO EXTEND DATE TO RESPOND TO PHASE 6 DISCOVERY ORDER

- by posting the document(s) listed above to the Santa Clara County Superior Court website in regard to the Antelope Valley Groundwater matter.
- by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Irvine, California addressed as set forth below.
- by causing personal delivery by ASAP Corporate Services of the document(s) listed above to the person(s) at the address(es) set forth below.
- by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on April 3, 2014, at Los Angeles, California.



Sandra K. Sandoval

26345.000008700378.1