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WATERWORKS DISTRICT NO. 40

**EXEMPT FROM FILING FEES
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SECTION 6103**

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WATERWORKS DISTRICT NO. 40

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

15 ANTELOPE VALLEY GROUNDWATER
16 CASES
17 Included Actions:
Los Angeles County Waterworks District No.
18 40 v. Diamond Farming Co., Superior Court of
California, County of Los Angeles, Case No.
19 BC 325201;
20 Los Angeles County Waterworks District No.
40 v. Diamond Farming Co., Superior Court of
21 California, County of Kern, Case No. S-1500-
CV-254-348;
22 Wm. Bolthouse Farms, Inc. v. City of
23 Lancaster, Diamond Farming Co. v. City of
Lancaster, Diamond Farming Co. v. Palmdale
24 Water Dist., Superior Court of California,
County of Riverside, Case Nos. RIC 353 840,
25 RIC 344 436, RIC 344 668
26 RICHARD WOOD, on behalf of himself and
all other similarly situated v. A.V. Materials,
27 Inc., et al., Superior Court of California,
County of Los Angeles, Case No. BC509546
28

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
IN SUPPORT OF LOS ANGELES
COUNTY WATERWORKS DISTRICT
NO. 40'S OPPOSITION TO CHARLES
TAPIA AND NELLIE TAPIA FAMILY
TRUST'S MOTION TO SET ASIDE
DEFAULT IN CROSS COMPLAINT,
AND REQUEST FOR DEFAULT
AGAINST CROSS-COMPLAINANT

Date: September 26, 2014
Time: 10:00 a.m.
Dept. 20

EXHIBIT A

Wendy Wang

From: Wendy Wang
Sent: Thursday, May 01, 2014 12:07 PM
To: 'Maureen Fink'
Cc: Jeffrey Dunn
Subject: RE: AV Groundwater Cases
Attachments: Entry of Default.pdf

Mr. Ward,

Per your request, attached is the entry of default.

Best,

Wendy Y. Wang
Best Best & Krieger LLP
Direct: (213) 787-2554

From: Maureen Fink [mailto:mfink_mswc@yahoo.com]
Sent: Thursday, May 01, 2014 11:54 AM
To: Wendy Wang
Subject: AV Groundwater Cases

Dear Ms. Wang:

Thank you for giving me the website. I have accessed it, but not the pleadings. Could you please advise me of when Tapia was served and provide a copy of the Default Request.

Thank you.

Thomas J. Ward

Sent From:
Maureen Fink, Legal Assistant to
Thomas J. Ward, Esq.
Michelizzi, Schwabacher, Ward & Collins
767 West Lancaster Boulevard
Lancaster, CA 93534
(661)948-5021; fax (661)948-5395

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EXHIBIT B

Wendy Wang

From: Wendy Wang
Sent: Friday, June 06, 2014 10:08 AM
To: 'Maureen Fink'
Subject: AV: Charles Tapia

Mr. Ward,

I've spoken with Jeff. We will not stipulate to set aside the default.

Best regards,

Wendy Y. Wang
Best Best & Krieger LLP
Direct: (213) 787-2554

LAW OFFICES OF
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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 September 15, 2014, I served the within document(s):

**DECLARATION OF WENDY Y. WANG IN SUPPORT OF DISTRICT NO. 40'S
OPPOSITION TO CHARLES TAPIA AND NELLIE TAPIA FAMILY TRUST'S
MOTION TO SET ASIDE DEFAULT IN CROSS COMPLAINT**

by posting the document(s) listed above to the Santa Clara County Superior Court website in regard to the Antelope Valley Groundwater matter.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on September 15, 2014, at Los Angeles, California.


Sandra K. Sandoval

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