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TELECOPIER: (949) 260-0972
5 Attorneys for Cross-Complainants
ROSAMOND COMMUNITY SERVICES
6 DISTRICT and LOS ANGELES COUNTY
WATERWORKS DISTRICT NO. 40

EXEMPT FROM FILING FEES
UNDER GOVERNMENT CODE
SECTION 6103

7 OFFICE OF COUNTY COUNSEL
8 COUNTY OF LOS ANGELES
RAYMOND G. FORTNER, JR., Bar No. 42230
9 COUNTY COUNSEL
FREDERICK W. PFAEFFLE, Bar No. 145742
10 PRINCIPAL DEPUTY COUNTY COUNSEL
500 WEST TEMPLE STREET
11 LOS ANGELES, CALIFORNIA 90012
TELEPHONE: (213) 974-1951
12 TELECOPIER: (213) 458-4020
Attorneys for Cross-Complainant LOS ANGELES
13 COUNTY WATERWORKS DISTRICT NO. 40

14 [See Next Page For Additional Counsel]

15 SUPERIOR COURT OF THE STATE OF CALIFORNIA
16 COUNTY OF LOS ANGELES – CENTRAL DISTRICT
17

18 **ANTELOPE VALLEY**
19 **GROUNDWATER CASES**

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
23 No. 40 v. Diamond Farming Co., Superior
Court of California, County of Kern, Case
24 No. S-1500-CV-254-348;

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

Judicial Council Coordination No. 4408

CLASS ACTION

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

**DECLARATION OF JEFFREY V. DUNN
IN SUPPORT OF OPPOSITION TO
CAMERON PROPERTIES, INC.'S
DEMURRER**

Hearing:

Date: March 3, 2008

Time: 10:00 a.m.

Dept.: 1

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LUCE, FORWARD, HAMILTON & SCRIPPS LLP
Douglas J. Evertz, Bar No. 123066
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(949) 737-3700 (916) 251-5830 fax
Attorneys for City of Lancaster

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Attorneys for City of Palmdale

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Attorneys for Littlerock Creek Irrigation District and
Palm Ranch Irrigation District

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

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

LAW OFFICES OF
BEST BEST & KRIEGER LLP
5 PARK PLAZA, SUITE 1500
IRVINE, CALIFORNIA 92614

DECLARATION OF JEFFREY V. DUNN

I, Jeffrey V. Dunn, declare:

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 an attorney licensed to practice law in the State of California. I am a partner of Best, Best & Krieger LLP, attorneys of record for Rosamond Community Services District and Los Angeles County Water Works District No. 40.

3. Since at least early July of 2007, my law firm has received various inquiries from legal counsel for Cameron Properties, Inc. My law firm has responded with telephone calls and correspondence including a map of the Court-established Adjudication Area and copies of various pleadings. Copies of all correspondence are too lengthy to be readily attached hereto but can be summarized as questions and answers to questions raised by Cameron Properties, Inc., as to whether it owns real property within the Adjudication Area.

4. Attached as Exhibit 1 hereto are true and correct copies of some of the correspondence between the parties beginning July 6, 2007 and continuing to January 25, 2008.

5. Based on the available public records, attorneys from my law firm have confirmed and repeatedly notified Cameron Properties, Inc., that it owns real property within the Adjudication Area. Attached hereto as Exhibit 2 is a map showing the location of Cameron Properties, Inc., real property ownership within the Adjudication Area.

I declare under penalty of perjury that the above is true and correct.

Executed this 19th day of February, 2008, at Irvine, California.



JEFFREY V. DUNN

ORANGE\44263.1

EXHIBIT “1”

BEST BEST & KRIEGER

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(925) 977-3300

File No. 26345.00001

July 6, 2007

Bernard Leckie, Esq.
Meserve Mumper & Hughes LLP
18400 Von Karman, Suite 320
Irvine, California 92612-1556

Re: Antelope Valley Groundwater Adjudication
Judicial Council Coordination Number 4408

Dear Mr. Leckie:

Pursuant to your request, enclosed is a copy of the Complaint filed in Los Angeles County Superior Court in regard to the above-referenced matter. Further, the APN number you requested for the Cameron properties is 3064020028.

Sincerely,


Kerry V. Keefe
Assistant to Jeffrey V. Dunn
of BEST BEST & KRIEGER LLP

Enclosure

ORANGE37597.1



BEST BEST & KRIEGER
ATTORNEYS AT LAW

Jeffrey V. Dunn
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File#: 26345.00001

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October 3, 2007

VIA FACSIMILE AND US MAIL

Bernard Leckie
Meserve, Mumper & Hughes LLP
18400 Von Karman Avenue
Suite 320
Irvine, California 92612-1556

Re: Antelope Valley Groundwater Cases

Dear Mr. Leckie:

This letter responds to your letter dated September 24, 2007. I have reviewed the correspondence and attachments.

Responding to item number one, the Court has determined the boundary of the adjudication area. According to our records, Cameron Properties owns three parcels within the adjudication boundary. These parcels are identified by the following Assessor Parcel Numbers: 3064021012; 3064021102; and 3064021006. I have enclosed a map of the adjudication area for your review. Please let me know if Cameron Properties does not own the above identified parcels.

Responding to item number two, the fact that Cameron Properties is already producing surface or spring water on its property does not allow us to exclude Cameron Properties from the adjudication. While the State Water Resources Control Board has jurisdiction over surface water and some types of spring water, it does not have jurisdiction over groundwater. Even though Cameron Properties has established spring or surface water rights it still must be included in the groundwater adjudication because it owns property within the adjudication boundary.

If Cameron Properties is interested in forgoing its groundwater rights for the above referenced property we can dismiss Cameron Properties from this litigation. Please inform let us know if you would like us to prepare the necessary paperwork.

Please feel free to contact me if you have any further questions.

Sincerely,


Jeffrey V. Dunn
of BEST BEST & KRIEGER LLP

BEST BEST & KRIEGER

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FACSIMILE TRANSMISSION

DATE: October 3, 2007

To:

NAME	FAX No.	PHONE No.
Bernard Leckie, Esq.	(949) 975-1065	

FROM: Jeffrey V. Dunn, Esq.

RE: Antelope Valley Groundwater

FILE No.: 26345.00001	USER No.: 1031	NO. OF PAGES, INCLUDING COVER: 2
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MESSAGE:

See attached 10/03/07, BB&K letter. The original and an enclosure of the map will be sent via regular mail.

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Confirmation Report - Memory Send

Page : 001
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 Line 1 : 9492600972
 Line 2 :
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Job number : 325
 Date : Oct-03 16:58
 To : 9751065
 Number of pages : 002
 Start time : Oct-03 16:58
 End time : Oct-03 16:59
 Pages sent : 002
 Status : OK

Job number : 325 *** SEND SUCCESSFUL ***

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 (213) 617-8110
 ONTARIO
 (909) 999-8114
 RIVERSIDE
 (951) 555-1110

FACSIMILE TRANSMISSION

DATE: October 3, 2007

TO:	NAME	FAX NO.	PHONE NO.
	Bernard Leckie, Esq.	(949) 975-1065	

FROM: Jeffrey V. Dunn, Esq.
 RE: Antelope Valley Groundwater

FILE NO.: 26345.00001	USER NO.: 1031	NO. OF PAGES, INCLUDING COVER: 2
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MESSAGE:

See attached 10/03/07, BB&K letter. The original and an enclosure of the map will be sent via regular mail.

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BEST BEST & KRIEGER
ATTORNEYS AT LAW

Stefanie D. Hedlund
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Stefanie.Hedlund@bbklaw.com
File#: 26345.00001

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Phone: (949) 263-2600
Fax: (949) 260-0972
bbklaw.com

October 17, 2007

VIA FACSIMILE AND US MAIL

Mr. Bernard Leckie
Meserve, Mumper & Hughes LLP
18400 Von Karman Avenue, Suite 320
Irvine, California 92612-1556

Re: Antelope Valley Groundwater Adjudication

Dear Mr. Leckie:

This letter responds to your letter dated October 9, 2007.

Please see my letter to you dated October 3, 2007. The Court determined the boundaries of the Adjudication Area based on a three day trial, which included many expert witnesses and testimony regarding the hydrology of the area. Please inform us if your client does not own the parcels identified by the following Assessor Parcel Numbers: 3064021012; 3064021102; and 3064021006.

Please feel free to contact us if you have any further questions.

Sincerely,

Stefanie D. Hedlund
for BEST BEST & KRIEGER LLP

ORANGE\SHEDLUND\40530.1

BEST BEST & KRIEGER

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FACSIMILE TRANSMISSION

DATE: October 17, 2007

TO:

NAME	FAX NO.	PHONE NO.
Mr. Bernard Leckie	(949) 975-1065	

FROM: Stefanie D. Hedlund

RE: Antelope Valley Groundwater

FILE NO.: 26345.00001	USER NO.: 1305	NO. OF PAGES, INCLUDING COVER: 2
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MESSAGE:

See attached 10/17/07, BB&K letter.

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Start time : Oct-17 10:35
End time : Oct-17 10:36
Pages sent : 002
Status : OK

Job number : 349

*** SEND SUCCESSFUL ***

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(916) 325-4000
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FACSIMILE TRANSMISSION

DATE: October 17, 2007

TO:

NAME	FAX NO.	PHONE NO.
Mr. Bernard Leckie	(949) 975-1065	

FROM: Stefanie D. Hedlund

RE: Antelope Valley Groundwater

FILE NO.: 26345.00001	USER NO.: 1305	NO. OF PAGES, INCLUDING COVER: 2
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MESSAGE:

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Stefanie D. Hedlund
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File#: 26345.00001

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January 25, 2008

VIA FACSIMILE AND US MAIL

Mr. Bernard Leckie
Meserve, Mumper & Hughes LLP
18400 Von Karman Avenue, Suite 320
Irvine, California 92612-1556

Re: Antelope Valley Groundwater Adjudication

Dear Mr. Leckie:

This letter responds to your letters dated January 16, 2008 and January 24, 2008.

Please see my letters to you dated October 3, 2007 and October 17, 2007. These letters respond to your questions regarding Cameron Properties involvement in this groundwater adjudication. Additionally, for more information regarding the status of the case please visit the court's website at: <http://www.scefiling.org/cases/casehome.jsp?caseId=19>.

Please feel free to contact us if you have any further questions.

Sincerely,

Stefanie D. Hedlund
for BEST BEST & KRIEGER LLP

ORANGE\SHEDLUND\43613.1

BEST BEST & KRIEGER

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TELECOPIER TRANSMISSION

DATE: January 25, 2008

To:

NAME	FAX NO.	PHONE NO.
Bernard Leckie Mererve Mumper & Hughes LLP	949-975-1065	

FROM: Stefanie D. Hedlund

RE: Antelope Valley Groundwater Adjudication

FILE NO.: 26345.00001	USER NO.: 1305	NO. OF PAGES, INCLUDING COVER: 2
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 End time : Jan-28 08:49
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 Status : OK

Job number : 360 *** SEND SUCCESSFUL ***

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TELECOPIER TRANSMISSION

DATE: January 25, 2008

TO:

NAME	FAX No.	PHONE No.
Bernard Leckie Mererve Mumper & Hughes LLP	949-975-1065	

FROM: Stefanie D. Hedlund

RE: Antelope Valley Groundwater Adjudication

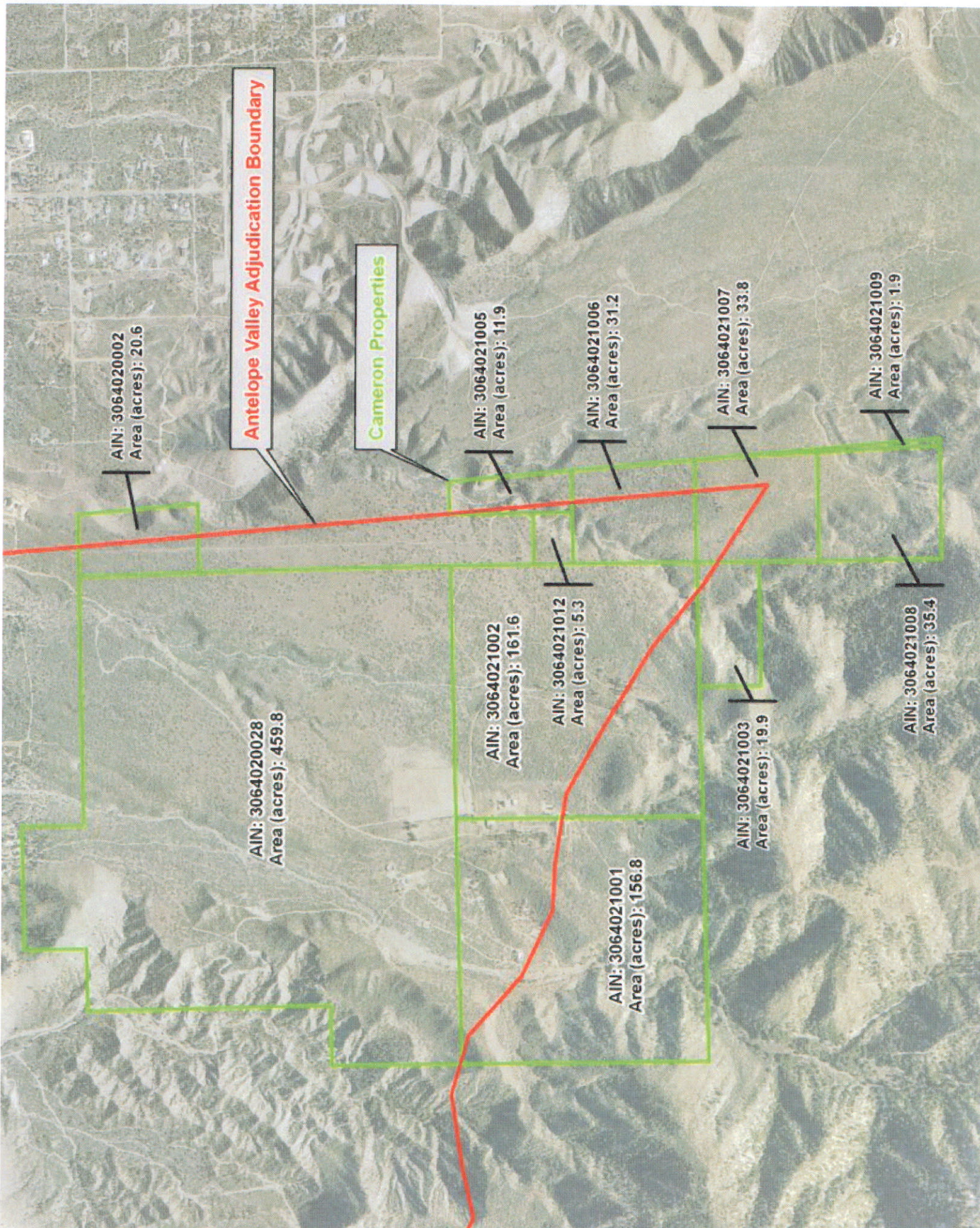
FILE No.: 26345.00001	USER No.: 1305.	NO. OF PAGES, INCLUDING COVER: 2
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MESSAGE:

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EXHIBIT “2”



AIN: 3064020002
Area (acres): 20.6

Antelope Valley Adjudication Boundary

Cameron Properties

AIN: 3064021005
Area (acres): 11.9

AIN: 3064021006
Area (acres): 31.2

AIN: 3064021007
Area (acres): 33.8

AIN: 3064021009
Area (acres): 1.9

AIN: 3064020028
Area (acres): 459.8

AIN: 3064021002
Area (acres): 161.6

AIN: 3064021012
Area (acres): 5.3

AIN: 3064021001
Area (acres): 156.8

AIN: 3064021003
Area (acres): 19.9

AIN: 3064021008
Area (acres): 35.4

1 PROOF OF SERVICE

2 I, Kerry V. Keefe, declare:

3 I am a resident of the State of California and over the age of eighteen years, and
4 not a party to the within action; my business address is Best Best & Krieger LLP, 5 Park Plaza,
Suite 1500, Irvine, California 92614. On February 19, 2008, I served the within document(s):

5 **DECLARATION OF JEFFREY V. DUNN IN SUPPORT OF OPPOSITION TO**
6 **CAMERON PROPERTIES, INC.'S DEMURRER**

- 7 by posting the document(s) listed above to the Santa Clara County Superior Court
8 website in regard to the Antelope Valley Groundwater matter.
- 9 by placing the document(s) listed above in a sealed envelope with postage thereon
10 fully prepaid, in the United States mail at Irvine, California addressed as set forth
below.
- 11 by causing personal delivery by ASAP Corporate Services of the document(s)
12 listed above to the person(s) at the address(es) set forth below.
- 13 by personally delivering the document(s) listed above to the person(s) at the
14 address(es) set forth below.
- 15 I caused such envelope to be delivered via overnight delivery addressed as
16 indicated on the attached service list. Such envelope was deposited for delivery
17 by Federal Express following the firm's ordinary business practices.

18 I am readily familiar with the firm's practice of collection and processing
19 correspondence for mailing. Under that practice it would be deposited with the U.S. Postal
20 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.

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

22 Executed on February 19, 2008, at Irvine, California.

23
24 
25 _____
Kerry V. Keefe