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Eyherabide Sheep Company and Eyherabide Land Co., LLC
7

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF LOS ANGELES
10

11 ANTELOPE VALLEY
GROUNDWATER CASES

12 Included Actions:

13 Los Angeles County Waterworks District
14 No.40 v. Diamond Farming Co.
Los Angeles County Superior Court
15 Case No. BC 325201

16 Los Angeles County Waterworks District
17 No. 40 v. Diamond Farming Co.
Kern County Superior Court
Case No. S-1500-CV-254-348

18 Wm. Bolthouse Farms, Inc. v. City of
19 Lancaster, Diamond Farming Co. v. City of
Lancaster, Diamond Farming Co. v.
20 Palmdale Water Dist.
Riverside County Superior Court
21 Consolidated actions
Case Nos. RIC 353 840, RIC 344 436, RIC 344
22 668

Judicial Council Coordination No. 4408

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

Assigned to The Honorable Jack Komar

**DECLARATION OF JUANITA EYHERABIDE
ON BEHALF OF HERSELF, THE
EYHERABIDE SHEEP COMPANY, AND
EYHERABIDE LAND CO., LLC, IN
SUPPORT OF EYHERABIDE'S CLAIM TO
OVERLYING GROUNDWATER**

23
24 I, Juanita Eyherabide, hereby declare:

25 1. I am the majority owner of The Eyherabide Sheep Company and Eyherabide
26 Land Co., LLC, cross-defendants in this action, and am authorized to execute this declaration on behalf
27 of the Eyherabide entities. The Eyherabide Sheep Co. is a family business owned and operated by my
28 family since the late 1940s.

1 2. Eyherabide Land Co., LLC, currently has record title to approximately
2 8,214 acres of land in the Antelope Valley, all of which is located in Kern County, California. Prior to
3 transfer to the Eyherabide Land Co., LLC, title to the land was held in trust. I am informed and believe
4 that all of the land overlies the Antelope Valley Aquifer, the adjudication of which is the subject of the
5 above-captioned lawsuit.

6 3. My family currently raises sheep and cattle on the land. In the past, we raised
7 sheep, cattle, and alfalfa. My family has raised livestock and crops on the land in the Antelope Valley
8 since the mid-1960s.

9 4. As of the date of this Declaration, my family is grazing approximately
10 2,000 sheep and 150 cow-calf pairs. We pump water from private wells located on our land into storage
11 tanks on-site. Water is drained from the tanks to water the livestock as needed.

12 5. There are three groundwater wells on my family's land. The 1st well was
13 completed in 1968 and is located on Section 19, Township 9N, R14 West. The 2nd well was completed
14 in 1971 and is located on Section 19, Township 9N, R14 West. The 3rd well was completed in 1994 and
15 is located on Section 22, Township 9, Range 16.

16 6. Historically, my family's operation was much larger than it is at present. We
17 raised alfalfa on approximately 310 acres for many years in the 1960s and 1970s. Until the 1990s, we
18 were raising approximately 4,000 head of sheep and 150 cow-calf pairs. Our water use from the 1960s
19 to the 2000s was at least twice what it is now.

20 7. The Eyherabide Sheep Company currently uses approximately 13,000 gallons of
21 water per day to support our livestock. The storage tanks on our property hold 2,000 gallons each.
22 There are 4 tanks. 2000 gallon water trucks are filled four times a day. This water is used exclusively
23 for approximately 2,000 sheep we graze year round on the property. Additionally, a stationary tank is
24 use to water the cattle. Water is pumped to the tank and that tank is used to fill troughs for the cow-calf
25 pairs. All tanks are filled with gas powered by generators so there are no electric bills for the pumping.

26 8. The water used by my family is used on-site. The water we use is not sold,
27 transferred, or conveyed to anyone else. No other family or business has leased any portion of my
28 family's land at any point since we purchased it, however, there are some wind turbines on the property.

EXHIBIT “A”

