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

**ANTELOPE VALLEY GROUNDWATER
CASES**

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

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

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

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

AND RELATED ACTIONS

**Judicial Council Coordination Proceeding
No. 4408**

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

**SUPPLEMENTAL DECLARATION OF
MARK CROSBY, GENERAL MANAGER
OF PUBLIC WATER SUPPLIER / CROSS-
DEFENDANT WEST VALLEY COUNTY
WATER DISTRICT REGARDING WEST
VALLEY’S WATER PUMPING AND
USAGE RECORDS PREVIOUSLY
MARKED AS WEST VALLEY TRIAL
EXHIBITS 1 THROUGH 20**

Trial:
Date: September 28, 2015
Time: 9:00 am
Dept: 1
Room: 222
Judge: Hon. Jack Komar

**SUPPLEMENTAL DECLARATION OF MARK L. CROSBY,
GENERAL MANAGER OF WEST VALLEY COUNTY WATER DISTRICT
REGARDING WEST VALLEY’S WATER PUMPING AND USAGE RECORDS**

1. This Supplemental Declaration is made by Mark Crosby for and on behalf of Public

1 Water Supplier / Cross-Defendant West Valley County Water District (“West Valley”), including
2 in support of the Proposed Judgment and Physical Solution filed with the court on March 4, 2015
3 (“Proposed Judgment and Physical Solution”) which West Valley has stipulated to, as a
4 supplement to but inclusive of my previous two Declarations made in this matter [SCC E-Filing
5 Document Nos. 9974 & 10623].

6 West Valley was not named and served in the instant action until July 2014, and therefore
7 was not a party and did not appear at the Phase IV trial phase held in July 2013. Accordingly,
8 West Valley’s water records were not presented as evidence to the court or to the parties during the
9 Phase IV trial.

10 2. I have been employed as the General Manager of West Valley since 2005, and report
11 directly to West Valley’s Board of Directors. As part of the General Manager’s duties, I prepare
12 and maintain West Valley’s water production and usage records, and am Custodian of Records for
13 its water records. The facts in this Declaration are made both from my personal knowledge, and as
14 Custodian of Records from documents and other information maintained in the official business
15 records and files of West Valley. If called as a witness, I could and would competently testify in a
16 court of law as to the matters stated herein.

17 3. I am making this Supplemental Declaration to attest that the attached **West Valley Trial**
18 **Exhibits 1 through 20**, which are the trial exhibits that were previously been filed online by West
19 Valley on September 24, 2015 [SCC E-Filing Document No. 10637], and which Trial Exhibits,
20 except for West Valley Trial Exhibit 20, are true and correct copies of West Valley’s public
21 records that have been prepared and kept by West Valley and by me in my capacity as General
22 Manager and custodian of the records of West Valley, in the regular course of West Valley’s
23 business.

24 **West Valley Trial Exhibit 20** is a Summary of West Valley’s pumping records which was
25 prepared under my direction for the purposes of this litigation, and summarizes 14 years of West
26 Valley’s pumping records and water usage, from 2000 and 2013, which information was taken by
27 me from West Valley’s actual pumping records marked as West Valley Trial Exhibit 19.

28 I declare under the penalty of perjury pursuant to the laws of the State of California that the

1 foregoing is true and correct.

2 Executed at Neenach, California this 28th day of September, 2015.

3
4 By: _____

5 **MARK L. CROSBY**
6 General Manager of
7 West Valley County Water District
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1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

3 I am employed in the County of Los Angeles, State of California. I am over the age of 18
4 and not a party to the within action; my business address is 500 North Brand Boulevard, Suite 1030,
5 Glendale, California 91203-1923.

6 On **September 28, 2015**, I served the foregoing document described as: **Supplemental**
7 **Declaration of Mark Crosby, General Manager of Public Water Supplier / Cross-Defendant**
8 **West Valley County Water District Regarding West Valley’s Water Pumping And Usage**
9 **Records Previously Marked As West Valley Trial Exhibits 1 Through 20**, on the interested
10 parties as follows:

11 X **BY ELECTRONIC FILING:** by posting the document(s) listed above to the Santa Clara
12 County Superior Court website in regard to the Antelope Valley Groundwater matter.

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

15 Executed on **September 28, 2015**, at Glendale, California.

16 
17 **Nicole Padget**

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