

1 **COLDREN LAW OFFICES**
2 **A Professional Law Corporation**
3 Robert S. Coldren (Bar No. 81710)
4 3 Hutton Centre Drive, Ninth Floor
5 Santa Ana, California 92707
6 (714) 955-6106
7 Email: RColdren@coldrenlawoffices.com

8 Attorneys for Cross-Defendant,
9 MILANA VII, LLC, dba Rosamond Mobile Home Park

10
11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **COUNTY OF LOS ANGELES**

13 ANTELOPE VALLEY GROUNDWATER
14 CASES

15 Included Actions:

16 Los Angeles County Waterworks District
17 No.

18 40 v. Diamond Farming Co.

19 Los Angeles County Superior Court

20 Case No. BC 325201

21 Los Angeles County Waterworks District
22 No.

23 40 v. Diamond Farming Co.

24 Kern County Superior Court

25 Case No. S-1500-CV-254-348

26 Wm. Bolthouse Farms, Inc. v. City of

27 Lancaster, Diamond Farming Co. v. City of

28 Lancaster, Diamond Farming Co. v.

Palmdale

Water Dist.

Riverside County Superior Court

Consolidated actions

Case Nos. RJC 353 840, RIC 344 436, RIC
344

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 SCOTT MONROE
IN SUPPORT OF CROSS-DEFENDANT
MILANA VII, LLC, dba ROSAMOND
MOBILE HOME PARK'S CLAIMED
PRODUCTION RIGHT OF 21.7 ACRE-
FEET PER YEAR**

Trial/Prove-Up Hearings:

Date: August 3, 2015

Time: 10:00 a.m.

Dept: TBD

**DECLARATION IN SUPPORT OF MILANA VII, LLC, DBA ROSAMOND MOBILE HOME PARK'S
CLAIMED PRODUCTION RIGHT**

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

I, Scott Monroe, declare as follows:

1. I am presently the principal of Cross-Defendant, Milana VII, LLC, the entity which owns and operates the Rosamond Mobile Home Park, located at 1258 W. Rosamond Boulevard, Rosamond, California, which I am informed and understand is within the Antelope Valley Basin. I informed and believe that the following is true, and, if called upon to testify, could and would do so truthfully.
2. Rosamond Mobile Home Park ("Rosamond Park") has approximately seventy-eight (78) spaces on which it rents mobilehomes to residents who mostly own their own home. The Rosamond Park has many amenities, including a pool, laundry facility and landscaping. It is an affordable source of housing for residents in the City of Rosamond.
3. Rosamond Park pumps water from underground wells in order to provide water to its residents. However, the park has no meters from which it can absolutely estimate the exact amount of water used at the park for its residents and the common areas of the park.
4. Immediately across the street from the Rosamond Park is a very similar park named Desert Breeze which I understand is also a cross-defendant in this action. Desert Breeze MHP's address is 1262 W. Rosamond Boulevard, Rosamond, California.
5. The Desert Breeze MHP is very similar in size and amenities to Rosamond Park. I am informed and believe that Desert Breeze MHP has approximately sixty-five (65) pads, it has a 30,000 gallon pool, a laundry room and landscaping. I am further informed and believe that Desert Breeze uses at least 7,367,000 gallons of water per year which equates to 23 acre feet per year.
6. Using these figures from Desert Breeze MHP, I would estimate that the water

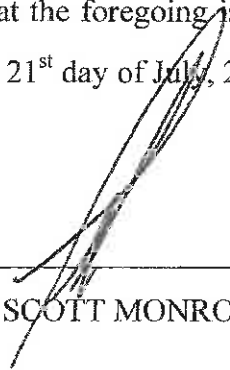
DECLARATION IN SUPPORT OF MILANA VII, LLC, DBA ROSAMOND MOBILE HOME PARK'S
CLAIMED PRODUCTION RIGHT

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

usage at Rosamond Park is approximately 28 acre-feet per year. I arrived at that figure based on the following math: If you take the 23 acre feet of water used at Desert Breeze MHP and divide it by the 63 spaces at that park, you get .365 acre feet per space. Multiplying .365 by the 78 spaces we have at Rosamond Park, it comes out to about 28 acre-feet per year.

- 7. Therefore, based on the water usage of a mobilehome park located across the street and which has the same, if not identical, amenities, I believe 28 acre-feet is a reasonably accurate estimate as to the amount of water usage at my park.
- 8. Although Rosamond MHP is likely using 28 acre-feet of water per year, after significant negotiations, Rosamond Park has agreed to accept and stipulate to a production right of 21.7 acre feet per year.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge. Executed this 21st day of July, 2015.



SCOTT MONROE

DECLARATION IN SUPPORT OF MILANA VII, LLC, DBA ROSAMOND MOBILE HOME PARK'S CLAIMED PRODUCTION RIGHT