

1 Robert H. Brumfield, III (State Bar No. 114467)
2 bob@brumfield-haganlaw.com
3 BRUMFIELD & HAGAN, LLP
4 A Limited Liability Partnership
5 2031 F Street
6 Bakersfield, CA 93301
7 Telephone: (661) 215-4980
8 Facsimile: (661) 215-4989

9 Attorneys for Mark Ritter, Successor Trustee of the
10 Ritter Family Trust

11
12 SUPERIOR COURT OF THE STATE OF CALIFORNIA
13 COUNTY OF LOS ANGELES – CENTRAL DISTRICT

14 ANTELOPE VALLEY
15 GROUNDWATER CASES

16 Included Actions:

17 Los Angeles County Waterworks District
18 No. 40 v. Diamond Farming Co., Superior
19 Court of California, County of Los
20 Angeles, Case No. BC 325201

21 Los Angeles County Waterworks District
22 No. 40 v. Diamond Farming Co., Superior
23 Court of California, County of Kern, Case
24 No. S-1500-CV-254348

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

Judicial Council Coordination No. 4408

CLASS ACTION

Santa Clara Case No. 1-05-CV-049053

**CASE MANAGEMENT CONFERENCE
STATEMENT OF MARK RITTER,
SUCCESSOR TRUSTEE OF THE RITTER
FAMILY TRUST**

Date: September 4, 2015

Time: 1:30 p.m.

Place: Santa Clara County Superior Court
(via CourtCall)

21 Mark Ritter, Successor Trustee of the Ritter Family Trust (hereinafter “Ritter Family
22 Trust”), hereby respectfully submits his Case Management Conference Statement as follows:

23 Mark Ritter’s mother, Paula E. Ritter, and his father, Edgar C. Ritter, were formerly the
24 Trustees of the Ritter Family Trust. According to the attorney for the Antelope Valley Ground
25 Water Agreement Association (“AGWA”), Michael T. Fife, the Ritter Family Trust was
26 approached about becoming involved as a part of the AGWA in this litigation.
27

28 While Mark Ritter does not know what exactly happened, as both his father Edgar and

1 mother Paula are now deceased, undersigned counsel searched the court's docket and determined
2 that an answer and cross complaint was filed by Mr. Fife's office on behalf of Edgar C. Ritter,
3 Paula E. Ritter, and Paula E. Ritter as Trustee of the Ritter Family Trust, with the answer being
4 filed January 2, 2007 and a first amended cross-complaint of the AGWA being filed January 26,
5 2007. Mark Ritter was unaware of these filings until undersigned counsel located them just prior
6 to a meeting with Mr. Ritter on August 14, 2015. Thereafter, Mr. Ritter engaged undersigned
7 counsel to represent him in this case.

8 Counsel for the AGWA has indicated that nothing was done on behalf of the Ritter Family
9 Trust, despite the fact that Mr. Fife's firm continues as counsel of record for the Ritter Family
10 Trust, and now the Ritter Family Trust finds it in a position where it's counsel of record did not
11 take steps to represent its client nor did it not substitute out of said representation. All of these
12 actions occurred prior to the time Mark Ritter was successor trustee and prior to the time Mark
13 Ritter ever even knew about this particular litigation.

14 The Ritter Family Trust does pump groundwater every year and primarily grows alfalfa.
15 Records are currently being obtained as to its water production which has occurred for many
16 years in the past.

17 In fairness to the Ritter Family Trust, undersigned counsel would request that the court
18 sever it from the upcoming trial in September 28, 2015, and allow it the opportunity to produce
19 documents as to its water usage and to conceivably be included in a settlement or at least allow at
20 the opportunity to prove up its use at a subsequent hearing.


21 Counsel does not want to unduly delay the issues, but because of the representation issue
22 referenced above and now the obvious need of the Ritter Family Trust to protect his own interests
23 and obtain its own counsel, this request is being made in fairness. Undersigned counsel will also
24 request that Mr. Fife's office formally execute a substitution of attorneys substituting in
25 Brumfield & Hagan in place of Mr. Fife's firm. Accordingly, the Ritter Family Trust requests
26 that it be allowed time to gather such documents and evidence as may be necessary to support its
27 claims in these cases and to present that to the court at a later time.

28 ///

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

Dated: September 3, 2015

BRUMFIELD & HAGAN, LLP
A Limited Liability Partnership

By: 
Robert H. Brumfield, III
Attorneys for Mark Ritter, Successor Trustee
of the Ritter Family Trust