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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF 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-1500-CV-254348

Wm. Bolthouse Farms, Inc. v. City of
Lancaster, Diamond Farming Co. v. City of
Lancaster, Diamond Farming Co. v.
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 CHARLES TAPIA,
INDIVIDUALLY AND AS TRUSTEE OF
THE NELLIE TAPIA FAMILY TRUST**

Date: September 4, 2015

Time: 1:30 p.m.

Place: Santa Clara County Superior Court
(via CourtCall)

Charles Tapia, individually and as Trustee of the Nellie Tapia Family Trust (hereinafter
“Tapia”), hereby respectfully submits his Status Conference Statement as follows:

Counsel for Tapia has reviewed the various Case Management Conference Statements
filed in connection with the upcoming hearing, and particularly the one filed by the Public Water
Suppliers this afternoon. The statements in the Statement filed by the Public Water Suppliers has
to Tapia are correct. Information continues to be exchanged as to Tapia’s water usage and other
supporting documents in an effort to reach a resolution. In fact, Tapia’s deposition was recently

1 taken on August 12, 2015.

2 Subsequent to the Deposition, further documents have been produced and Tapia is
3 endeavoring to locate additional documents that were requested at the deposition but is going to
4 have to attempt to locate those through public filings and either Kern County or Los Angeles
5 County as he no longer possesses the pesticide usage records that were requested in connection
6 with the deposition.

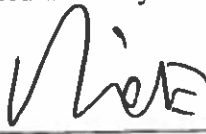
7 As to trial, counsel for Tapia is not available on September 28 and 29, 2015, due to a
8 previously set trial before the United States Bankruptcy Court, Eastern District of California,
9 sitting in Fresno. That trial date has been confirmed and will proceed. Commencing the week of
10 October 5, 2015, undersigned counsel will be available to participate in trial if necessary.

11 As to production of documents and testimony in support of Tapia's claim, it would be
12 Tapia's desire and preference to be able to present those by way of declaration. In regards to
13 scheduling, Tapia would request that he be allowed until September 25, 2015 to present such
14 Declaration testimony of himself and any witnesses in support of his claim that water use along
15 with submitting whatever documents to support his claimed usage.

16 Finally, Tapia is approaching 80 years old and traveling in and out of downtown Los
17 Angeles presents challenges. Accordingly, Tapia requests a specific day that he needs to attend
18 the trial if his live testimony is required.

19 Dated: September 3, 2015

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21 By: 

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24 Tapia Family Trust
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