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7 CLAN KEITH REAL ESTATE INVESTMENTS
8 LLC, dba LEISURE LAKE MOBILE ESTATES

9
10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

12 ANTELOPE VALLEY GROUNDWATER
13 CASES

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

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

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

23 RICHARD WOOD, on behalf of himself and
all other similarly situated v. A.V. Materials,
24 Inc., et al., Superior Court of California,
County of Los Angeles, Case No. BC509546
25

Judicial Council Coordination Proceeding
No. 4408

CLASS ACTION

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

**DECLARATION OF LUCAS I. QUASS IN
SUPPORT OF CLAN KEITH REAL
ESTATE, LLC'S EX PARTE APPLICATION
TO SUBSTITUTE CLAN KEITH REAL
ESTATE, LLC, dba LEISURE LAKE
MOBILE ESTATES IN PLACE OF CROSS-
DEFENDANTS GOODYORK
CORPORATION AND LANCASTER
SUMMIT PROPERTIES, LTD.**

Date: September 21, 2015
Time: 1:00 p.m.
Dept.: Telephonic via CourtCall

*[Filed concurrently with:
(1) EX PARTE APPLICATION TO SUBSTITUTE
PARTIES; and
(2) [PROPOSED] ORDER TO SUBSTITUTE
PARTIES.]*

1 **DECLARATION OF LUCAS I. QUASS**

2 I, Lucas I. Quass, declare as follows:

3 1. I have personal knowledge of the facts below, and if called upon to do so, I could
4 testify competently thereto in a court of law.

5 2. I am licensed to practice law in the State of California and am an attorney of
6 Latham & Watkins LLP, attorneys of record for Clan Keith Real Estate Investments, LLC dba
7 Leisure Lake Mobile Estates ("Clan Keith").

8 3. Goodyork Corporation and Lancaster Summit Properties, Ltd. (collectively
9 "Goodyork") are named Cross-Defendants in the *Antelope Valley Groundwater Cases*, and the
10 real property located at 48303 N. 20th Street West, Lancaster, California (Los Angeles County
11 Assessor's Parcel Nos. 3116-015-002, 31160015-003, 3117-007-001) (the "Property") lies
12 within the Antelope Valley Groundwater Basin boundaries adjudicated by this Court on
13 November 3, 2006, and is among the land subject to this proceeding.

14 4. Attached as Exhibit "A" is a true and correct copy of the Grant Deed conveying
15 the Property, including all water rights, to Clan Keith, which was notarized and recorded in the
16 Official Records Recorder's Office for Los Angeles County, California on or about August 31,
17 2015.

18 5. Attached as Exhibit "B" is a true and correct copy of Goodyork's Case
19 Management Conference Statement filed with this Court on or about September 3, 2015, which
20 confirms that Goodyork owned the Property prior to conveying the Property to Clan Keith.

21 6. Since acquiring the Property, Clan Keith has continued to do business at the
22 Property as Leisure Lake Mobile Estates, and plans to continue to operate the business going
23 forward.

24 7. Attached as Exhibit "C" is a true and correct copy of this Court's minute order
25 filed on or about September 4, 2015, advising that a substitution of attorney should be filed to
26 permit counsel of record for Clan Keith to continue the representation with respect to the
27 Property.

28

EXHIBIT "A" TO DECLARATION OF LUCAS I. QUASS

This page is part of your document - DO NOT DISCARD



20151071631



Pages:
0009

Recorded/Filed in Official Records
Recorder's Office, Los Angeles County,
California

08/31/15 AT 08:00AM

FEES:	43.00
TAXES:	14,025.00
OTHER:	0.00
PAID:	<u>14,068.00</u>



LEADSHEET



201508310990013

00011070362



007052360

SEQ:
02

DAR - Title Company (Hard Copy)



THIS FORM IS NOT TO BE DUPLICATED

RECORDER MEMO: This COPY is NOT an OFFICIAL RECORD.

2

RECORDING REQUESTED BY:

FIDELITY NATIONAL TITLE CO.

WHEN RECORDED MAIL THIS DEED AND
MAIL TAX STATEMENTS TO:

Clan Keith Real Estate Investments, LLC
2320 West Ray Road, Suite 3
Chandler, AZ 85224

APNs: 3116-015-002; 3116-015-003;
3117-007-001



23057276 KM GRANT DEED

THE UNDERSIGNED GRANTOR DECLARES:

DOCUMENTARY TRANSFER TAX IS \$14,029.

- unincorporated area City of Los Angeles
- computed on full value of interest or property conveyed, or
- computed on full value less value of liens or encumbrances remaining at time of sale, and

FOR A VALUABLE CONSIDERATION, receipt of which is hereby acknowledged, Goodyork Corporation, a California corporation, as to an undivided 51% interest, and Lancaster Summit Properties, LTD., a California limited partnership, as an undivided 49% interest, hereby GRANT to Clan Keith Real Estate Investments, LLC, a Delaware limited liability company, the following described real property in the City of Los Angeles, County of Los Angeles, State of California:

See Exhibit A attached hereto and incorporated herein by this reference.

[Signatures on the Following Page]

RECORDER MEMO: This COPY is NOT an OFFICIAL RECORD.

Mail Tax Statements to Return Address Above

25

3

Dated: May 19, 2015.


Goodyork Corporation,
a California corporation

By: William S. Chan
Name: William S. Chan
Title: V-P

4

Dated: May 20, 2015.

Lancaster Summit Properties, LTD.,
a California limited partnership

By: 
Name: Sally Deane
Title: General Partner

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy or validity of that document.

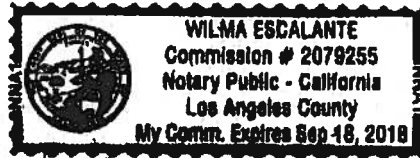
STATE OF CALIFORNIA)
COUNTY OF Los Angeles) ss.

On May 19, 2015, before me Wilma Escalante, a Notary Public in and for said County and State, personally appeared William S. Chan, who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledge to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY of PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Wilma Escalante
Notary Public



6

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy or validity of that document.

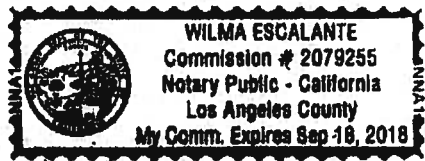
STATE OF CALIFORNIA)
COUNTY OF Los Angeles) ss.

On May 20, 2015, before me Wilma Escalante, a Notary Public in and for said County and State, personally appeared Sally Huang, who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) are subscribed to the within instrument and acknowledge to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY of PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Wilma Escalante
Notary Public



RECORDER MEMO: This COPY is NOT an OFFICIAL RECORD.

7

EXHIBIT A

LEGAL DESCRIPTION

THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

PARCEL 1:

THAT PORTION OF THE NORTHEAST QUARTER OF SECTION 29, TOWNSHIP 8 NORTH, RANGE 12 WEST, SAN BERNARDINO MERIDIAN, IN THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, ACCORDING TO THE OFFICIAL PLAT OF SAID LAND THEREOF, DESCRIBED AS FOLLOWS:

BEGINNING AT THE NORTHEAST CORNER OF SAID SECTION 39; THENCE ALONG THE NORTHERLY LINE OF SAID SECTION 29, SOUTH 89°30'00" WEST 1030.23 FEET TO THE EASTERLY LINE OF LAND DESCRIBED IN PARCEL 1 IN THE DEED TO THE STATE OF CALIFORNIA, RECORDED AUGUST 4, 1965 AS INSTRUMENT NO. 1969, IN BOOK D-3003, PAGE 161 OF OFFICIAL RECORDS OF SAID COUNTY; THENCE ALONG SAID EASTERLY LINE, SOUTH 0°28'45" EAST 1324.99 FEET TO THE SOUTHERLY LINE OF THE NORTH ONE-HALF OF THE NORTHEAST QUARTER OF SAID SECTION 29; THENCE EASTERLY ALONG SAID SOUTHERLY LINE TO THE EASTERLY LINE OF SAID SECTION 29; THENCE ALONG SAID LAST MENTIONED EASTERLY LINE, NORTH 0°23'30" WEST 1325.18 FEET TO THE POINT OF BEGINNING.

PARCEL 2:

THAT PORTION OF THE NORTHEAST QUARTER OF SECTION 29, TOWNSHIP 8 NORTH, RANGE 12 WEST, SAN BERNARDINO MERIDIAN, IN THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, ACCORDING TO THE OFFICIAL PLAT OF SAID LAND THEREOF, DESCRIBED AS FOLLOWS:

BEGINNING AT A POINT IN THE NORTHERLY LINE OF SAID SECTION 29, THAT IS DISTANT SOUTH 89°30'00" WEST 1030.23 FEET FROM THE NORTHEAST CORNER OF SAID SECTION 29, SAID POINT BEING THE EASTERLY LINE OF THE LAND DESCRIBED IN PARCEL 1 IN THE DEED TO THE STATE OF CALIFORNIA, RECORDED AUGUST 4, 1965 AS INSTRUMENT NO. 1969, IN BOOK D-3003, PAGE 161 OF OFFICIAL RECORDS OF SAID COUNTY; THENCE ALONG SAID EASTERLY LINE, SOUTH 0°28'45" EAST 1324.99 FEET TO THE SOUTHERLY LINE OF THE NORTH HALF OF THE NORTHEAST QUARTER OF SAID SECTION 29, AND THE TRUE POINT OF BEGINNING OF THIS DESCRIPTION; THENCE FROM SAID TRUE POINT OF BEGINNING, EASTERLY ALONG SAID SOUTHERLY LINE TO THE EASTERLY LINE OF SAID SECTION 29; THENCE ALONG SAID LAST MENTIONED EASTERLY LINE, SOUTH 0°23'30" EAST 1325.17 FEET TO THE SOUTHEAST CORNER

8

OF THE NORTHEAST QUARTER OF SAID SECTION 29; THENCE ALONG THE SOUTHERLY LINE OF SAID NORTHEAST QUARTER, SOUTH 89°31'13" WEST 1026.15 FEET TO THE EASTERLY LINE OF THE LAND DESCRIBED IN PARCEL 1 IN SAID DEED TO THE STATE OF CALIFORNIA; THENCE ALONG THE LAST MENTIONED EASTERLY LINE, NORTH 0°28'45" WEST 1324.99 FEET TO THE TRUE POINT OF BEGINNING.

PARCEL 3:

THAT PORTION OF THE NORTHEAST QUARTER OF SECTION 29; TOWNSHIP 8 NORTH, RANGE 12 WEST, SAN BERNARDINO MERIDIAN, IN THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, ACCORDING TO THE OFFICIAL PLAT THEREOF, DESCRIBED AS FOLLOWS:

BEGINNING AT THE NORTHWEST CORNER OF SAID NORTHEAST QUARTER; THENCE ALONG THE NORTHERLY LINE OF SAID NORTHEAST QUARTER, NORTH 89°30'00" EAST 1363.20 FEET TO THE WESTERLY LINE OF THE LAND DESCRIBED IN PARCEL 1 IN THE DEED TO THE STATE OF CALIFORNIA, RECORDED ON AUGUST 4, 1965 AS INSTRUMENT NO. 1969, IN BOOK D-3003, PAGE 161 OF OFFICIAL RECORDS, OF SAID COUNTY; THENCE ALONG SAID WESTERLY LINE, SOUTH 0°28'45" EAST 1324.95 FEET TO THE SOUTHERLY LINE OF THE NORTH ONE-HALF OF SAID NORTHEAST QUARTER; THENCE WESTERLY ALONG SAID SOUTHERLY LINE TO THE WESTERLY LINE OF SAID NORTHEAST QUARTER; THENCE ALONG SAID LAST MENTIONED WESTERLY LINE, NORTH 0°26'21" WEST 1324.71 FEET TO THE POINT OF BEGINNING.

PARCEL 4:

THAT PORTION OF THE NORTHEAST QUARTER OF SECTION 29, TOWNSHIP 8 NORTH, RANGE 12 WEST, SAN BERNARDINO MERIDIAN, IN THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, ACCORDING TO THE OFFICIAL PLAT THEREOF, DESCRIBED AS FOLLOWS:

BEGINNING AT A POINT IN THE NORTHERLY LINE OF SECTION 29, THAT IS DISTANT THEREON NORTH 89°30'00" EAST 1363.20 FEET FROM THE NORTHWEST CORNER OF SAID NORTHEAST QUARTER, SAID POINT BEING IN THE WESTERLY LINE OF THE LAND DESCRIBED IN PARCEL 1 IN THE DEED TO THE STATE OF CALIFORNIA, RECORDED ON AUGUST 4, 1965 AS INSTRUMENT NO. 1969 IN BOOK D-3003, PAGE 161 OF OFFICIAL RECORDS OF SAID COUNTY; THENCE ALONG SAID WESTERLY LINE, SOUTH 0°28'45" EAST 1324.95 FEET TO THE SOUTHERLY LINE OF THE NORTH ONE-HALF OF THE NORTHEAST QUARTER OF SAID SECTION 29 AND THE TRUE POINT OF BEGINNING OF THIS DESCRIPTION; THENCE FROM SAID TRUE POINT OF BEGINNING WESTERLY ALONG SAID SOUTHERLY LINE TO THE WESTERLY LINE OF SAID NORTHEAST QUARTER; THENCE ALONG SAID LAST MENTIONED WESTERLY LINE, SOUTH 0°26'21" EAST 1324.71 FEET TO THE SOUTHWEST CORNER OF SAID NORTHEAST

9

QUARTER; THENCE ALONG THE SOUTHERLY LINE OF SAID NORTHEAST
QUARTER, NORTH 89°31'13" SECONDS EAST 1365.05 FEET TO THE WESTERLY
LINE OF THE LAND DESCRIBED IN PARCEL 1 IN SAID DEED TO THE STATE OF
CALIFORNIA; THENCE ALONG SAID LAST MENTIONED WESTERLY LINE, NORTH
0°28'45" WEST 1324.95 FEET TO THE TRUE POINT OF BEGINNING.

APN: 3116-015-002 & 003, 3117-007-001

EXHIBIT "B" TO DECLARATION OF LUCAS I. QUASS

1 Walter J. Wilson (SBN 68040)
LAW OFFICES OF WALTER J. WILSON
2 333 West Broadway, Suite 200
Long Beach, CA 90802
3 Tel: (562) 432-3388 Fax: (562) 432-2969
Email: walterw1@aol.com

4 Attorney for Antelope Valley Mobile Estates, LLC
5 and For Desert Breeze MHP, LLC

6 **Specially Appearing For Goodyork Corporation**
and **Lancaster Summit Properties, Ltd., dba**
7 **Leisure Lake Mobile Estates, and**
8 **Specially Appearing For White Fence Farms Mutual Water Co.**
No. 3

9
10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **COUNTY OF LOS ANGELES**

12
13 **ANTELOPE VALLEY**
14 **GROUNDWATER CASES**

15 Included Actions:

16 Los Angeles County Waterworks District
No. 40 v. Diamond Farming Co.
17 Los Angeles County Superior Court
Case No. BC 325201

18 Los Angeles County Waterworks District
19 No. 40 v. Diamond Farming Co.

20 Kern County Superior Court
Case No. S-1500-CV-254-348
21 Wm. Bolthouse Farms, Inc. v. City of
Lancaster, Diamond Farming Co. v. City of
22 Lancaster, Diamond Farming Co. v.
Palmdale Water Dist.
23 Riverside County Superior Court
Consolidated actions
24 Case Nos. RIC 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

**CMC STATEMENT FOR
ANTELOPE VALLEY MOBILE
ESTATES, LLC AND DESERT BREEZE
MHP, LLC, AND (SPECIAL
APPEARANCE) FOR GOODYORK
CORPORATION AND LANCASTER
SUMMIT PROPERTIES, LTD. (DBA
LEISURE LAKE MOBILE ESTATES),
AND (SPECIAL APPEARANCE) FOR
WHITE FENCE FARMS MUTUAL
WATER CO. NO. 3**

Date: 09/04/2015
Time: 1:30 p.m.
Dept.: Via Court Call Only

25
26 **TO THE COURT AND ALL PARTIES:**

27 Counsel Specially Appears (under limited Retainer Agreements), as follows:

28 1. **Sale of Property**. Goodyork Corporation and Lancaster Summit Properties, Ltd., jointly

1 doing business as Leisure Lake Mobile Estates, sold their real property and business thereon, and the
2 buyer (entity unknown to counsel) is to now be represented by Lucas Quass of Latham & Watkins;
3 at the conclusion of this hearing, upon this notice to Court, counsel anticipates his services will no
4 longer be necessary/appropriate.

5 **2. White Fence Farms Mutual Water Co. No. 3 ("WFF3") Has Applied to the**
6 **Committee of the Stipulating Parties For a Water Allocation.** WFF3 appeared in this action as
7 defendant and cross complainant, but stopped actively participating.

8 WFF3 has applied to the Committee of the Stipulating Parties (via counsel, under a limited
9 retainer agreement) for an allocation of water.

10
11 **3. Ready for Trial.** As to Antelope Valley Mobile Estates, LLC (a Stipulating Party to the
12 Proposed Judgment and Physical Solution) and Desert Breeze MHP, LLC (which has agreed to a
13 Trial Stipulation with the Stipulating Parties), both will be ready to prove at trial their groundwater
14 usage, etc..

15
16 Dated: September 3, 2015

Respectfully submitted,

LAW OFFICES OF WALTER J. WILSON

17
18
19 

20 Walter J. Wilson, Attorney for
21 Antelope Valley Mobile Estates, LLC and
22 for Desert Breeze MHP, LLC
23 **Specially Appearing for Goodyork Corp-
24 oration and Lancaster Summit
25 Properties, Ltd., dba Leisure Lake
26 Mobile Estates, and
27 Specially Appearing for White Fence Farms
28 Water Mutual Co. No. 3**

1 **PROOF OF SERVICE**

2 I am a resident of the State of California and over the age of eighteen years, and not a party
3 to the within action; my business address is 333 West Broadway, Suite 200, Long Beach, CA 90802.

4 On September 4, 2015, I served the within document(s) in the Antelope Valley Groundwater
5 Adjudication Cases, JCCP No. 4408, described as:

6 **CMC STATEMENT FOR ANTELOPE VALLEY MOBILE ESTATES, LLC AND DESERT**
7 **BREEZE MHP, LLC, AND (SPECIAL APPEARANCE) FOR GOODYORK CORPORATION**
8 **AND LANCASTER SUMMIT PROPERTIES, LTD. (DBA LEISURE LAKE MOBILE**
9 **ESTATES), AND (SPECIAL APPEARANCE) FOR WHITE FENCE FARMS WATER MUTUAL**
10 **CO. NO. 3**

11 on the interested parties in this action, by posting the document(s) listed above to the Santa Clara
12 County Superior Court e-filing website (<http://www.scefiling.org>) under the Antelope Valley
13 Groundwater matter pursuant to the Court's Order dated October 27, 2005.

14 I declare under penalty of perjury under the laws of the State of California that the above is
15 true and correct. Executed on September 4, 2015, at Long Beach, California.


16
17 
18 Walter J. Wilson

EXHIBIT "C" TO DECLARATION OF LUCAS I. QUASS

**SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES**

<p>Coordination Proceeding Special Title (Rule 1550(b))</p> <p>ANTELOPE VALLEY GROUNDWATER CASES</p> <p>Included Actions:</p> <p><i>Los Angeles County Waterworks District No. 40 v. Diamond Farming Co.</i>, Superior Court of California, County of Los Angeles, Case No. BC 325 201</p> <p><i>Los Angeles County Waterworks District No. 40 v. Diamond Farming Co.</i>, Superior Court of California, County of Kern, Case No. S-1500-CV-254-348</p> <p><i>Wm. Bolthouse Farms, Inc. v. City of Lancaster</i> <i>Diamond Farming Co. v. City of Lancaster</i> <i>Diamond Farming Co. v. Palmdale Water Dist.</i> Superior Court of California, County of Riverside, consolidated actions, Case Nos. RIC 353 840, RIC 344 436, RIC 344 668</p> <p><i>Willis v. Los Angeles County Waterworks District No. 40</i>, Superior Court of California, County of Los Angeles, Case No. BC 364 553</p> <p><i>Wood v. Los Angeles County Waterworks District No. 40</i>, Superior Court of California, County of Los Angeles, Case No. BC 391869</p> <p><i>Wood v. A.V. Materials, Inc., et al.</i>, Superior Court of California, County of Los Angeles, Case No. BC 509546</p> <p><i>Wood v. County of Los Angeles</i>, Superior Court of California, County of Los Angeles, Case No. BS 143790 [ADD-ON PETITION IS PENDING]</p>	<p>Judicial Council Coordination Proceeding No. 4408</p> <p>For Court's Use Only: Santa Clara County Case No. 1-05-CV-049053 (for E-Posting/E-Service Purposes Only)</p>
--	--

Date/Time: Friday, September 4, 2015

1:30 p.m.

Location: CourtCall

Superior Court of California
County of Santa Clara

Antelope Valley Groundwater Cases (JCCP 4408)
Los Angeles County Superior Court, Case No. BC 325 201
September 4, 2015 (1:30pm) / Hon. Jack Komar, Ret.

F:\komar\antelope Valley\2015-09-04 MO.doc

Present: Hon. Jack Komar, Judge
N/A _____, Reporter CSR#

Rowena Walker, Clerk (SC)
N/A _____, Deputy Sheriff

MINUTE ORDER:

(1) Motion by Copa De Oro Land Company to Move Stipulated and Admitted Facts into the Evidentiary Record (property ownership and past water use information)

Attorney Andrew Ramos appeared. Attorney Lynn Brennan, for the Willis Class, objects. **GRANTED**; the Court will permit Copa de Oro to offer the evidence, subject to cross-examination.

(2) Ex Parte Application by Plaintiff Richard Wood and the Class for Approval of Court-Appointed Expert Bills

Attorney Michael McLachlan appeared; matter is unopposed; **GRANTED**. These invoices cover the period of May 2015 through August 2015 – copies are attached to this minute order for reference (Exhibit 1).

(3) Ex Parte Application by Hi-Grade Materials, Co., Robar Enterprises, Inc. and CJR to Continue the Phase IV Trial

Attorney Karen L. Bilotti, for the moving party, appeared. Attorneys Jeffrey Dunn and Wendy Wang, for Los Angeles County Waterworks District No. 40, responds. The Court orders that the matters that are late served will "trail" the case while they gather their evidence of pumping and try to enter into the proposed settlement.

(4) Case Management Conference

Attorney Robert Brumfield appeared to make a scheduling request. Due to counsel's previously set bankruptcy court trial, the Court will permit Tapia to commence participation in the trial the week of October 5, 2015, and a specific date for live trial testimony will be assigned to Mr. Charles Tapia.

The Court confirmed that the claims of prescription are only applicable to the non-stipulating parties.

Attorney Robert Brumfield makes a request on behalf of Mark Ritter, Successor Trustee of the Ritter Family Trust, that Attorney Michael Fife execute a substitution of attorneys as soon as possible. Mr. Fife confirmed his intent to do so as soon as possible.

Attorney Walter Wilson stated that Goodyork Corporation and Lancaster Summit Properties, Ltd., jointly doing business as Leisure Lake mobile Estates, sold their real property and business. The buyer, Clan Keith Real Estate Investments LLC, now

doing business as Leisure Lakes, is represented by Attorney John Morris, who appeared today to confirm the same, the party's intent to participate in the Stipulated Proposed Physical Solution ("SPPS"), and that a substitution of attorneys will be filed forthwith.

Attorney Walter Wilson, for White Fence Farms Water Mutual Co. No. 3 ("WFF3"), stated that he applied to the Committee of the Stipulating Parties for a water allocation on behalf of WFF3.

A further meet and confer shall be arranged by the Liaison Committee and shall be completed by September 11, 2015, with a Further Status Teleconference to be held on **Monday, September 21, 2015 at 1:00 pm** via CourtCall.

APPEARANCES: See attached CourtCall List.

REPORTER: NOT REPORTED

EVENT CALENDAR:

September 28, 2015 thru October 16, 2015	9am	Includes, but not limited to, the non-stipulating parties' prove-up; presentation of physical solutions and objections thereto; and evidence in the default proceedings; Motion by Willis Class to Enforce Settlement Agreement with Public Water Suppliers; Motion to Enforce Due Process; Motion for Court Order for Payment of Expert Witness Fees for the Willis Class for Physical Solution Proceedings.
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Location – Superior Court, County of Los Angeles, Room 222, 2nd Floor, 111 North Hill Street, Los Angeles, CA 90012.

September 29, 2015	9am	Motion by Wood Class to Correct Willis Class Judgment <i>Nunc Pro Tunc</i>
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Location – Superior Court, County of Los Angeles, Room 222, 2nd Floor, 111 North Hill Street, Los Angeles, CA 90012.

PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to this action. My business address is Latham & Watkins LLP, 355 South Grand Avenue, Los Angeles, CA 90071-1560.

On **September 17, 2015**, I served the following document described as:

DECLARATION OF LUCAS I. QUASS IN SUPPORT OF CLAN KEITH REAL ESTATE, LLC'S *EX PARTE* APPLICATION TO SUBSTITUTE CLAN KEITH REAL ESTATE, LLC, dba LEISURE LAKE MOBILE ESTATES IN PLACE OF CROSS-DEFENDANTS GOODYORK CORPORATION AND LANCASTER SUMMIT PROPERTIES, LTD.

By posting the document(s) listed above to the Santa Clara County Superior Court website in regard to the Antelope Valley Groundwater matter.

The party on whom this electronic mail has been served has agreed in writing to such form of service pursuant to agreement.

I declare that I am employed in the office of a member of the Bar of, or permitted to practice before, this Court at whose direction the service was made and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on **September 17, 2015**, at Los Angeles, California.


Cleveland Styles