

1 EDMUND G. BROWN JR.
Attorney General of the State of California
2 TOM GREENE
Chief Assistant Attorney General
3 J. MATTHEW RODRIQUEZ
Senior Assistant Deputy Attorney General
4 MICHAEL L. CROW
Deputy Attorney General
5 State Bar No. 70498
VIRGINIA CAHILL
6 Deputy Attorney General
State Bar No. 099167
7 1300 I Street
P.O. Box 944255
8 Sacramento, CA 94244-2550
Telephone: (916) 327-7856
9 Fax: (916) 327-2319
Michael.Crow@doj.ca.gov;
10 Virginia.Cahill@doj.ca.gov
Attorneys for Defendant State of California;
11 Santa Monica Mountains Conservancy; 50th District
Agricultural Association
12

13 SUPERIOR COURT OF CALIFORNIA
14 COUNTY OF LOS ANGELES

15 Coordination Proceeding Special title (Rule 1550(b))

16 **ANTELOPE VALLEY GROUNDWATER CASES:**

17 Included Actions:
18 Los Angeles County Waterworks District No. 40 v.
Diamond Farming Co.
19 Superior Court of California, County of Los Angeles,
Case No.: BC 325 201
20 Los Angeles County Waterworks District No. 40 v.
21 Diamond Farming Co.
Superior Court of California, County of Kern, Case No.:
22 S-1500-CV-254-348
23 Wm. Bolthouse Farms, Inc. v. City of Lancaster
Diamond Farming Co. v. City of Lancaster
24 Diamond Farming Co. v. Palmdale Water District
Superior Court of California, County of Riverside,
25 consolidated actions, Case Nos. RIC 353 840, RIC 344
436, RIC 344 668
26

Judicial Council Coordination
Proceeding No.: 4408
Case No.: 1-05-CV-049053

**STATE PARTIES'
STATEMENT OF NON-
OPPOSITION TO PLAINTIFF
WILLIS' MOTION FOR
CLASS CERTIFICATION**

27 Cross-defendants State of California, Santa Monica Mountains Conservancy and
28 50th District Agricultural Association hereby state that they do not oppose Plaintiff Willis' Motion

1 for Class Certification, filed July 23, 2007. This statement of non-opposition is limited to
2 certification of the class as described in Willis' Motion, the designation of Willis as lead plaintiff
3 for the class, and designation of Willis' attorneys as lead counsel for the class. State Parties
4 propose that any certification order permit members of the class to opt out of the class and
5 participate in this case individually if they so choose.

6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: August 2, 2007

Respectfully submitted,

EDMUND G. BROWN JR.
Attorney General of the State of California

TOM GREENE
Chief Assistant Attorney General

J. MATTHEW RODRIQUEZ
Senior Assistant Deputy Attorney General

VIRGINIA CAHILL
Deputy Attorney General



MICHAEL L. CROW

Deputy Attorney General

Attorneys for Attorneys for Defendant State of
California; Santa Monica Mountains
Conservancy; 50th District Agricultural
Association