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13 **NORTHROP GRUMMAN CORPORATION**
14 (*Sued Herein As Doe 534*)

15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
16 **FOR THE COUNTY OF LOS ANGELES**

17 ANTELOPE VALLEY
18 GROUNDWATER CASES,

19 Included Actions:

20 Los Angeles County Waterworks District
21 No. 40 v. Diamond Fanning Co.
22 Los Angeles County Superior Court
23 Case No. BC 325201

24 Los Angeles County Waterworks District
25 No. 40 v. Diamond Farming Co.
26 Kern County Superior Court
27 Case No. S-1500-CV -254-348

28 Wm. Bolthouse Farms, Inc. v. City of
Lancaster, Diamond Farming Co. v. City
of Lancaster, Diamond Fanning Co. v.
Palmdale Water Dist.
Riverside County Superior Court
Consolidated actions
Case Nos. RIC 353 840, RIC 344 436,
RIC 344 668

Judicial Council Coordination No. 4408

For filing purposes only:
Case No.: 1-05-CV-049053

Assigned to the Honorable Jack Komar

**ANSWER TO FIRST AMENDED
CROSS-COMPLAINT OF CROSS-
DEFENDANT NORTHROP
GRUMMAN CORPORATION**
(*Sued Herein As Doe 534*)

1 I hereby answer the Cross-Complaints which have been filed as of this date, specifically
2 those of Antelope Valley East-Kern Water Agency, Palmdale Water District & Quartz Hill
3 Water District, Rosamond Community Services District and Waterworks District No. 40 of
4 Los Angeles County. I do not intend to participate at trial or other proceedings unless
5 ordered by the Court to do so, but I reserve the right to do so upon giving written notice to
6 that effect to the Court and all parties. I own the following property(ies) located in the
7 Antelope Valley: 6242 Little Oak Canyon Road, Rosamond, CA 93560.

8 **GENERAL DENIAL**

9 1. Pursuant to Code of Civil Procedure section 431.30(d), Cross-Defendant
10 hereby generally denies each and every allegation set forth in the Cross-Complaint, and the
11 whole thereof, and further denies that Cross-Complainants are entitled to any relief against
12 Cross-Defendant.

13 **AFFIRMATIVE DEFENSES**

14 **First Affirmative Defense**

15 (Failure to State a Cause of Action)

16 2. The Cross-Complaint and every purported cause of action contained
17 therein fail to allege facts sufficient to constitute a cause of action against Cross-Defendant.

18 **Second Affirmative Defense**

19 (Statute of Limitation)

20 3. Each and every cause of action contained in the Cross-Complaint is
21 barred, in whole or in part, by the applicable statutes of limitation, including, but not limited
22 to, sections 318, 319, 321, 338, and 343 of the California Code of Civil Procedure.

23 **Third Affirmative Defense**

24 (Laches)

25 4. The Cross-Complaint, and each and every cause of action contained
26 therein, is barred by the doctrine of laches.

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1 **Fourth Affirmative Defense**

2 (Estoppel)

3 5. The Cross-Complaint, and each and every cause of action contained
4 therein, is barred by the doctrine of estoppel.

5 **Fifth Affirmative Defense**

6 (Waiver)

7 6. The Cross-Complaint, and each and every cause of action contained
8 therein, is bared by the doctrine of waiver.

9 **Sixth Affirmative Defense**

10 (Self-Help)

11 7. Cross-Defendant has, by virtue of the doctrine of self-help, preserved its
12 paramount overlying right to extract groundwater by continuing, during all times relevant
13 hereto, to extract groundwater and put it to reasonable and beneficial use on its property.

14 **Seventh Affirmative Defense**

15 (California Constitution Article X, Section 2)

16 8. Cross-Complainant's methods of water use and storage are
17 unreasonable and wasteful in the arid conditions of the Antelope Valley and thereby violate
18 Article X, Section 2 of the California Constitution.

19 **Eighth Affirmative Defense**

20 (Additional Defenses)

21 9. The Cross-Complainants do not state their allegations with sufficient
22 clarity to enable cross-defendant to determine what additional defenses may exist to Cross-
23 Complainants' causes of action, Cross-defendant therefore reserves the right to assert all
24 other defenses which may pertain to the Complaint and Cross-Complaint.

25 **Ninth Affirmative Defense**

26 10. The prescriptive claims asserted by governmental entity Cross-
27 Complainants are *ultra vires* and exceed the statutory authority by which each entity may
28

1 acquire property as set forth in Water Code sections 22456, 31040 and 55370.

2 **Tenth Affirmative Defense**

3 11. The prescriptive claims asserted by governmental entity Cross-
4 Complainants are barred by the provisions of Article 1 Section 19 of the California
5 Constitution.

6 **Eleventh Affirmative Defense**

7 12. The prescriptive claims asserted by governmental entity Cross-
8 Complainants are barred by the provisions of the 5th Amendment to the United States
9 Constitution as applied to the states under the 14th Amendment of the United States
10 Constitution.

11 **Twelfth Affirmative Defense**

12 13. Cross-Complainants' prescriptive claims are barred due to their failure
13 to take affirmative steps that were reasonably calculated and intended to inform each
14 overlying landowner of cross-complainants' adverse and hostile claim as required by the
15 due process clause of the 5th and 14th Amendments of the United States Constitution.

16 **Thirteenth Affirmative Defense**

17 14. The prescriptive claims asserted by governmental entity Cross-
18 Complainants are barred by the provisions of Article 1 Section 7 of the California
19 Constitution.

20 **Fourteenth Affirmative Defense**

21 15. The prescriptive claims asserted by governmental entity Cross-
22 Complainants are barred by the provisions of the 14th Amendment to the United States
23 Constitution.

24 **Fifteenth Affirmative Defense**

25 16. The governmental entity Cross-Complainants were permissively
26 pumping at all times.

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Sixteenth Affirmative Defense

17. The request for the court to use its injunctive powers to impose a physical solution seeks a remedy that is in violation of the doctrine of separation of powers set forth in Article 3 section 3 of the California Constitution.

Seventeenth Affirmative Defense

18. Cross-Complainants are barred from asserting their prescriptive claims by operation of law as set forth in Civil Code sections 1007 and 1214.

Eighteenth Affirmative Defense

19. Each Cross-Complainant is barred from recovery under each and every cause of action contained in the Cross-Complaint by the doctrine of unclean hands and/or unjust enrichment.

Nineteenth Affirmative Defense

20. The Cross-Complaint is defective because it fails to name indispensable parties in violation of California Code of Civil Procedure Section 389(a).

Twentieth Affirmative Defense

21. The governmental entity Cross-Complainants are barred from taking, possessing or using cross-defendants' property without first paying just compensation.

Twenty-First Affirmative Defense

22. The governmental entity Cross-Complainants are seeking to transfer water right priorities and water usage which will have significant effects on the Antelope Valley Groundwater basin and the Antelope Valley. Said actions are being done without complying with and contrary to the provisions of California's Environmental Quality Act (CEQA) (Pub.Res.C. 2100 *et seq.*).

Twenty-Second Affirmative Defense

23. The governmental entity Cross-Complainants seek judicial ratification of a project that has had and will have a significant effect on the Antelope Valley Groundwater Basin and the Antelope Valley that was implemented without providing

1 notice in contravention of the provisions of California's Environmental Quality Act
2 (CEQA) (Pub.Res.C. 2100 *et seq.*).

3 **Twenty-Third Affirmative Defense**


4 24. Any imposition by this court of a proposed physical solution that
5 reallocates the water right priorities and water usage within the Antelope Valley will be
6 *ultra vires* as it will be subverting the pre-project legislative requirements and protections of
7 California's Environmental Quality Act (CEQA) (Pub.Res.C. 2100 *et seq.*).

8 **WHEREFORE**, Cross-defendant prays that judgment be entered as follows:

- 9 1. That Cross-Complainants take nothing by reason of their Cross-
10 Complaint;
- 11 2. That the Cross-Complaints be dismissed with prejudice;
- 12 3. For Cross-Defendant's costs incurred herein; and
- 13 4. For such other and further relief as the Court deems just and proper.

14 DATED: August 22, 2007

15 EDWARD J. CASEY
16 TAMMY L. JONES
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20 Tammy L. Jones

21 Attorneys for Cross-Defendant
22 NORTHROP GRUMMAN CORPORATION
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PROOF OF SERVICE

I, Yolanda S. Ramos, declare:

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is Weston, Benshoof, Rochefort, Rubalcava & MacCuish LLP, 333 South Hope Street, Sixteenth Floor, Los Angeles, CA 90071. I am over the age of eighteen years and not a party to the action in which this service is made.

On August 22, 2007, I served the document(s) described as ANSWER TO FIRST AMENDED CROSS-COMPLAINT OF CROSS-DEFENDANT NORTHROP GRUMMAN CORPORATION (Sued Herein As Doe 534) on the interested parties in this action by enclosing the document(s) in a sealed envelope addressed as follows:

BY MAIL: I am "readily familiar" with this firm's practice for the collection and the processing of correspondence for mailing with the United States Postal Service. In the ordinary course of business, the correspondence would be deposited with the United States Postal Service at 333 South Hope Street, Los Angeles, California 90071 with postage thereon fully prepaid the same day on which the correspondence was placed for collection and mailing at the firm. Following ordinary business practices, I placed for collection and mailing with the United States Postal Service such envelope at Weston, Benshoof, Rochefort, Rubalcava & MacCuish LLP, 333 South Hope Street, Los Angeles, California 90071.

BY ELECTRONIC MAIL: By posting the document listed above to the Santa Clara Superior Court website: www.scefiling.org regarding the ANTELOPE VALLEY GROUNDWATER matter.

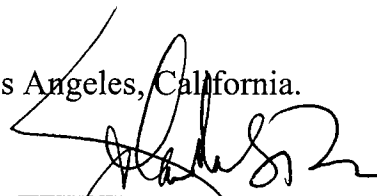
BY FEDERAL EXPRESS UPS NEXT DAY AIR OVERNIGHT DELIVERY: I deposited such envelope in a facility regularly maintained by FEDERAL EXPRESS UPS Overnight Delivery [specify name of service:] with delivery fees fully provided for or delivered the envelope to a courier or driver of FEDERAL EXPRESS UPS OVERNIGHT DELIVERY [specify name of service:] authorized to receive documents at Weston, Benshoof, Rochefort, Rubalcava & MacCuish LLP, 333 South Hope Street, Los Angeles, California 90071 with delivery fees fully provided for.

BY FACSIMILE: I telecopied a copy of said document(s) to the following addressee(s) at the following number(s) in accordance with the written confirmation of counsel in this action.

[State] I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

[Federal] I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 22, 2007, at Los Angeles, California.


YOLANDA S. RAMOS

WESTON BENSHOOF ROCHEFORT RUBALCAVA MACCUISH LLP
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**Coordination Proceeding
Special Title (Rule 1550 (b))**

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**ANTELOPE VALLEY GROUNDWATER CASES
Judicial Council Coordination Proceeding No. 4408
Santa Clara County Superior Court Case No. 1-05-CV 049053
SERVICE LIST**

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Honorable Charles W. McCoy Los Angeles County Superior Court Department 1, Room 109 111 North Hill Street Los Angeles, CA 90012-3014	Originals filed at LASC, Room 109
Chair, Judicial Council of California Administrative Office of the Court Attention: Appellate & Trial Court Judicial Services Civil Case Coordination 455 Golden Gate Avenue San Francisco, CA 94102-3688	
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