

# EXHIBIT 4

LAW OFFICES OF  
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**LOS ANGELES COUNTY WATERWORKS**  
6 **DISTRICT NO. 40**

**EXEMPT FROM FILING FEES  
UNDER GOVERNMENT CODE  
SECTION 6103**

7 **OFFICE OF COUNTY COUNSEL**  
**COUNTY OF LOS ANGELES**  
8 JOHN F. KRATTLI, Bar No. 82149  
COUNTY COUNSEL  
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12 Attorneys for Cross Complainant **LOS ANGELES**  
**COUNTY WATERWORKS DISTRICT NO. 40**

13  
14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
15 **COUNTY OF LOS ANGELES**

16  
17 **ANTELOPE VALLEY**  
**GROUNDWATER CASES**  
18  
19 **Included Actions**  
Los Angeles County Waterworks District  
No. 40 v. Diamond Farming Co., Superior  
20 Court of California, County of Los  
Angeles, Case No. BC 325201

Judicial Council Coordination No. 4408

**CLASS ACTION**

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

21  
22 **Los Angeles County Waterworks District**  
**No. 40 v. Diamond Farming Co., Superior**  
**Court of California, County of Kern, Case**  
23 **No. S 1500 CV 254 348**

**DECLARATION OF Hong He Otu IN  
LIEU OF DEPOSITION TESTIMONY FOR  
PHASE 4 TRIAL**

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

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**DECLARATION**

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**DECLARATION**

I, Hong-lie Qiu, Ph.D., declare:

1. I am a Professor for The California State University, Los Angeles' Department of Geography and Environment, Antelope Valley-East Kern Water Agency (AVEK), a party to this action has retained my services regarding the categories shown below. In lieu of deposition testimony for the Phase 4 trial, I am providing this declaration. This declaration applies only to the categories I have filled in. The items left blank or crossed out do not apply to me. I have personal knowledge of each fact herein and would testify competently thereto under oath.

**Property Ownership and Parcel Size**

2. AVEK has identified property that it owns that overlies the Antelope Valley Area of Adjudication as decided by this Court. The land is in Kern and Los Angeles Counties and is identified by the following APN/APNs:

See Exhibit A: Kern County Property (Calandri) and Los Angeles County Property (Godde).

**Crop Duties and Irrigated Acres**

3. In order to calculate water use on the properties referenced above, AVEK relies on the amount of acres in irrigation on the properties referenced above multiplied by what is believed to be accurate and appropriate crop duties for each crop grown. See Exhibit B attached hereto. Should the Court determine that different crop duties apply, then in that event the water usage calculations will be adjusted appropriately.

22. The total amount of irrigated acres and type of crops on the properties referenced above by APN for the years 2000-2004, 2011 and 2012 are described in Exhibit C.

**Use of Water** *Complete for each APN. If water for used for multiple purposes, identify the amount of water for each use.)*

See Exhibit C.

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 31<sup>st</sup> day of January 2013, at Los Angeles, California.



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**EXHIBIT "A"**

**Property APNs**

**Godde:**

<b>APNs Old:</b>	<b>APNs New:</b>
325 -001-004	325 -001-900
325 -001-005	325 -001-901
325 -001-039	325 -001-902
325 -010-0 9	325 -010-900
325 -010-0	325 -010-901
325 -010-001	325 -010-902
32 1-001-005	32 1-001-900
32 1-001-007	32 1-001-901
32 1-009-001	32 1-009-900

**Calandri:**

<b>APNs:</b>	<b>APNs Con't:</b>
359-032-3	374-200-45
374-011-13	374-200-50
374-011-19	374-200-51
374-011-20	374-200-52
374-011-21	374-200-53
374-011-22	374-200-54
374-020-40	374-200-55
374-020-42	374-200-5
374-020-55	374-200-57
374-200-03	374-210-0
374-200-29	374-250-01
374-200-30	374-250-03
374-200-3	374-410-0
374-200-39	374-440-05
374-200-40	374-440-0
374-200-41	374-440-07
374-200-42	374-440-0
374-200-43	375-020-01
374-200-44	

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**EXHIBIT "A" Con't**

**Antelope Valley-East Kern Water Agency (AVEK)  
 Property APNs & Acreage**

**Godde:**

APNs Old:	APNs New:	Acres (Gross)
325 -001-004	325 -001-900	10.00
325 -001-005	325 -001-901	5.00
325 -001-039	325 -001-902	0.23
325 -010-001	325 -010-902	1 0.00
325 -010-0	325 -010-901	1 0.00
325 -010-0 9	325 -010-900	1 0.00
32 1-001-005	32 1-001-900	0.00
32 1-001-007	32 1-001-901	1 0.00
32 1-009-001	32 1-009-900	40.00
<b>Total:</b>		<b>1455.23</b>

**Calandri:**

APNs:	Acres (Gross)	APNs Con't:	Acres (Gross)
359-032-3	11 .21	374-200-45	5.01
374-011-13	313.05	374-200-50	9.
374-011-19	20.10	374-200-51	9. 9
374-011-20	20.10	374-200-52	9. 9
374-011-21	20.14	374-200-53	9. 9
374-011-22	20.15	374-200-54	2.50
374-020-40	9.42	374-200-55	2.50
374-020-42	23. 1	374-200-5	2.50
374-020-55	135.91	374-200-57	2.50
374-200-03	0.00	374-210-0	79.09
374-200-29	2.50	374-250-01	7.73
374-200-30	2.50	374-250-03	9.55
374-200-3	9. 1	374-410-0	39.4
374-200-39	9. 1	374-440-05	20.11
374-200-40	9. 2	374-440-0	20.09
374-200-41	9. 2	374-440-07	20.0
374-200-42	5.01	374-440-0	20.09
374-200-43	5.01	375-020-01	312.72
374-200-44	5.01		
<b>Total:</b>		<b>14 2.0</b>	

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**EXHIBIT "B"**

**Crop Duty  
Table  
Applied Crop Water**

<b>Crop</b>	<b>Applied Water (AF/Acre)</b>
<b>Alfalfa</b>	<b>7.0</b>
<b>Carrots</b>	<b>4.5</b>
<b>Grain</b>	<b>4.5</b>
<b>Onions</b>	<b>4.5</b>

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**EXHIBIT "C"**

**Antelope Valley-East Kern Water Agency (AVEK)  
 Property Irrigated Lands, Types of Crops  
 SUMMARY 2000-2004, 2001-2012  
 Usage (AF)**

AIN/APN	2000	2001	2002	2003	2004	2011	2012
3590323 0	0.00	0.00	0.00	759.27	20 . 7	321. 0	0.00
37401113	1022.73	1103.34	1022.73	1103.34	0.00	1454.40	1454.40
374011195	13 .22	0.00	13 .22	0.00	0.00	0.00	0.00
374011203	73.22	0.00	73.22	0.00	0.00	0.00	0.00
374011211	125.04	0.00	125.04	0.00	0.00	0.00	0.00
374011229	139.05	0.00	139.05	0.00	0.00	0.00	0.00
37402042	310.25	199.45	0.00	199.45	0.00	0.00	0.00
374020550	93.51	224.2	0.00	93.51	0.00	13 9.90	13 9.90
37420003	0.00	525.	0.00	525.	0.00	0.00	0.00
374200293	0.00	17.47	0.00	17.47	0.00	0.00	0.00
374200301	0.00	17.00	0.00	17.00	0.00	0.00	0.00
3742003 4	0.00	.75	0.00	.75	0.00	0.00	0.00
374200392	0.00	2. 7	0.00	2. 7	0.00	0.00	0.00
374200400	0.00	.74	0.00	.74	0.00	0.00	0.00
37420041	0.00	0.43	0.00	0.43	0.00	0.00	0.00
37420042	0.00	21.71	0.00	21.71	0.00	0.00	0.00
374200434	0.00	30. 4	0.00	30. 4	0.00	0.00	0.00
374200442	0.00	32.90	0.00	32.90	0.00	0.00	0.00
374200459	0.00	31. 5	0.00	31. 5	0.00	0.00	0.00
374200509	0.00	7 .2	0.00	7 .2	0.00	0.00	0.00
374200517	0.00	72.5	0.00	72.5	0.00	0.00	0.00
374200525	0.00	70.94	0.00	70.94	0.00	0.00	0.00
374200533	0.00	.99	0.00	.99	0.00	0.00	0.00
374200541	0.00	15.00	0.00	15.00	0.00	0.00	0.00
37420055	0.00	1 .02	0.00	1 .02	0.00	0.00	0.00
3742005	0.00	1 .24	0.00	1 .24	0.00	0.00	0.00
374200574	0.00	15. 1	0.00	15. 1	0.00	0.00	0.00
3742100	5 2.15	0.00	5 2.15	0.00	0.00	0.00	0.00
374250017	4 7.03	0.00	4 7.03	0.00	0.00	72 .49	72 .49
374250033	7.4	0.00	7.4	0.00	0.00	104.94	104.94
3744100 2	0.00	2 .49	0.00	2 .49	0.00	0.00	0.00
374440055	140.77	0.00	140.77	0.00	140.77	0.00	0.00
3744400 3	137.3	0.00	137.3	0.00	137.3	0.00	0.00
374440071	139.24	0.00	139.24	0.00	139.24	0.00	0.00
3744400 9	137. 1	0.00	137. 1	0.00	137. 1	0.00	0.00
375020013	102 .92	103 .53	102 .92	103 .53	77 .1	3212.93	3212.93



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1	325 001900	7.01	0.00	0.00	0.00	7.01	0.00	0.00
2	325 001901	33.33	0.00	0.00	0.00	33.33	0.00	0.00
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1 EXHIBIT "C" Con't

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3 Antelope Valley-East Kern Water Agency (AVEK)  
4 Property Irrigated Lands, Types of Crops  
5 SUMMARY 2000-2004, 2001-2012  
6 Usage (AF)

AIN/APN	2000	2001	2002	2003	2004	2011	2012
325 001902	529.	529.	0.00	529.	0.00	23.92	0.00
325 010900	750.53	750.53	0.00	750.53	1732.92	1732.92	0.00
325 010901	129 .05	129 .05	15 3.17	1304. 7	1304. 7	779.24	0.00
325 010902	1275.45	1275.45	1275.45	1275.45	1559.3	1559.3	0.00
32 1001900	31.30	534.41	31.30	31.30	31.30	31.30	0.00
32 1001901	1 17.9	1 17.9	1 17.9	1325.	00.04	149 .37	0.00
32 1009900	43 .53	3494. 9	3554.07	407 .37	4017.19	3271.32	0.00
Total (acre feet)	1 14 . 4	13 1 . 4	1303 .9	15 40.07	11 .29	17704.90	. 5

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12 Antelope Valley-East Kern Water Agency (AVEK)  
13 Property Irrigated Lands, Types of Crops  
14 YEAR 2000

AIN	APN	CropType	Rate	Acres	Water Use (AF)
325 001900	325 001900	Onion	4.5	14.9	7.0
325 001901	325 001901	Onion	4.5	7.4	33.3
325 001902	325 001902-A	Onion	4.5	5.9	25.3
325 001902	325 001902-B	Onion	4.5	0.	273.4
325 010900	325 010900-A	None	-	-	-
325 010900	325 010900-B	Onion	4.5	1 .	750.5
325 010901	325 010901-A	Alfalfa	7.0	111.3	779.2
325 010901	325 010901-B	Onion	4.5	114.	51 .
325 010902	325 010902-A	Alfalfa	7.0	109.2	7 4.4
325 010902	325 010902-B	Onion	4.5	113.	511.1
32 1001900	32 1001900	Alfalfa	7.0	11 .	31.3
32 1001901	32 1001901-A	Alfalfa	7.0	11 .	17.9
32 1001901	32 1001901-B	Alfalfa	7.0	1.2	42 .4
32 1001901	32 1001901-C	Alfalfa	7.0	53.1	371.
32 1009900	32 1009900-A	Alfalfa	7.0	11 .1	12.5
32 1009900	32 1009900-B	Alfalfa	7.0	75.	530.4
32 1009900	32 1009900-C	Alfalfa	7.0	3 .2	253.4
32 1009900	32 1009900-D	Alfalfa	7.0	239.3	1, 75.1
32 1009900	32 1009900-E	None	-	-	-
32 1009900	32 1009900-F	Onion	4.5	243.4	1,095.2
3590323 0	3590323 0-A	None	-	-	-
3590323 0	3590323 0-B	None	-	-	-
3590323 0	3590323 0-C	None	-	-	-
37401113	37401113 -A	Carrot	4.5	227.3	1,022.7
37401113	37401113 -B	None	-	-	-
37401113	37401113 -C	None	-	-	-
374011195	374011195	Carrot	4.5	30.3	13 .2
374011203	374011203	Carrot	4.5	1 .3	73.2

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**EXHIBIT "C" Con't**

374011211	374011211	Carrot	4.5	27.	125.0
374011229	374011229	Carrot	4.5	30.9	139.1
37402042	37402042	Alfalfa	7.0	44.3	310.3
374020550	374020550-A	Onion	4.5	32.0	144.2
374020550	374020550-B	Carrot	4.5	1 .5	749.3
37420003	37420003	None	-	-	-
374200293	374200293	None	-	-	-
374200301	374200301	None	-	-	-
3742003 4	3742003 4	None	-	-	-
374200392	374200392	None	-	-	-
374200400	374200400	None	-	-	-
37420041	37420041	None	-	-	-
37420042	37420042	None	-	-	-
374200434	374200434	None	-	-	-
374200442	374200442	None	-	-	-
374200459	374200459	None	-	-	-
374200509	374200509	None	-	-	-
374200517	374200517	None	-	-	-
374200525	374200525	None	-	-	-
374200533	374200533	None	-	-	-
374200541	374200541	None	-	-	-
37420055	37420055	None	-	-	-
3742005	3742005	None	-	-	-
374200574	374200574	None	-	-	-
3742100	3742100	Carrot	4.5	124.9	5 2.2
374250017	374250017	Carrot	4.5	103.	4 7.0
374250033	374250033	Carrot	4.5	15.0	7.5
3744100 2	3744100 2	None	-	-	-
374440055	374440055	Carrot	4.5	31.3	140.
3744400 3	3744400 3	Carrot	4.5	30.5	137.4
374440071	374440071	Carrot	4.5	30.9	139.2
3744400 9	3744400 9	Carrot	4.5	30.	137.
375020013	375020013-A1	Carrot	4.5	5 .	2 3.5
375020013	375020013-A2	Carrot	4.5	55.3	24 .7
375020013	375020013-A3	Carrot	4.5	114.4	514.7
375020013	375020013-B	None	-	-	-

Total: 1 ,14 .

**Antelope Valley-East Kern Water Agency (AVEK)**

**Property Irrigated Lands, Types of Crops**

**YEAR 2001**

AIN	APN	CropType	Rate	Acres	Water Use
325 001900	325 001900	None	-	-	-
325 001901	325 001901	None	-	-	-
325 001902	325 001902-A	Onion	4.5	5 .9	25 .3
325 001902	325 001902-B	Onion	4.5	0.	273.4
325 010900	325 010900-A	None	-	-	-
325 010900	325 010900-B	Onion	4.5	1 .	750.5
325 010901	325 010901-A	Alfalfa	7.0	111.3	779.2

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1 EXHIBIT "C" Con't

2	325 010901	325 010901-B	Carrot	4.5	114.	51 .
3	325 010902	325 010902-A	Alfalfa	7.0	109.2	7 4.4
4	325 010902	325 010902-B	Onion	4.5	113.	511.1
5	32 1001900	32 1001900	Onion	4.5	11 .	534.4
6	32 1001901	32 1001901-A	Alfalfa	7.0	11 .	17.9
7	32 1001901	32 1001901-B	Alfalfa	7.0	1.2	42 .4
8	32 1001901	32 1001901-C	Alfalfa	7.0	53.1	371.
9	32 1009900	32 1009900-A	None	-	-	-
10	32 1009900	32 1009900-B	Alfalfa	7.0	75.	530.4
11	32 1009900	32 1009900-C	Alfalfa	7.0	3 .2	253.4
12	32 1009900	32 1009900-D	Alfalfa	7.0	239.3	1, 75.1
13	32 1009900	32 1009900-E	Carrot	4.5	230.2	1,03 .0
14	32 1009900	32 1009900-F	None	-	-	-
15	3590323 0	3590323 0-A	None	-	-	-
16	3590323 0	3590323 0-B	None	-	-	-
17	3590323 0	3590323 0-C	None	-	-	-
18	37401113	37401113 -A	None	-	-	-
19	37401113	37401113 -B	Carrot	4.5	127.	574.2
20	37401113	37401113 -C	Onion	4.5	117.	529.1
21	374011195	374011195	None	-	-	-
22	374011203	374011203	None	-	-	-
23	374011211	374011211	None	-	-	-
24	374011229	374011229	None	-	-	-
25	37402042	37402042	Onion	4.5	44.3	199.4
26	374020550	374020550-A	Alfalfa	7.0	32.0	224.3
27	374020550	374020550-B	None	-	-	-
28	37420003	37420003	Carrot	4.5	11 .	525.7
29	374200293	374200293	Carrot	4.5	3.9	17.5
30	374200301	374200301	Carrot	4.5	3.	17.0
31	3742003 4	3742003 4	Carrot	4.5	14.	.
32	374200392	374200392	Carrot	4.5	14.0	2.9
33	374200400	374200400	Carrot	4.5	15.3	.7
34	37420041	37420041	Carrot	4.5	13.4	0.4
35	37420042	37420042	Carrot	4.5	4.	21.7
36	374200434	374200434	Carrot	4.5	.	30.
37	374200442	374200442	Carrot	4.5	7.3	32.9
38	374200459	374200459	Carrot	4.5	7.0	31.
39	374200509	374200509	Onion	4.5	1 .9	7 .3
40	374200517	374200517	Onion	4.5	1 .1	72.
41	374200525	374200525	Onion	4.5	15.	70.9
42	374200533	374200533	Onion	4.5	14.9	7.0
43	374200541	374200541	Carrot	4.5	3.3	15.0
44	37420055	37420055	Carrot	4.5	3.	1 .0
45	3742005	3742005	Carrot	4.5	3.	1 .2

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EXHIBIT "C" Con't

374200574	374200574	Carrot	4.5	3.5	15.
3742100	3742100	None	-	-	-
374250017	374250017	None	-	-	-
374250033	374250033	None	-	-	-
3744100 2	3744100 2	Onion	4.5	59.2	2 .5
374440055	374440055	None	-	-	-
3744400 3	3744400 3	None	-	-	-
374440071	374440071	None	-	-	-
3744400 9	3744400 9	None	-	-	-
375020013	375020013-A1	None	-	-	-
375020013	375020013-A2	None	-	-	-
375020013	375020013-A3	None	-	-	-
375020013	375020013-B	Carrot	4.5	230.	1,03 .5
				Total:	13, 1 .5

Antelope Valley-East Kern Water Agency (AVEK)  
 Property Irrigated Lands, Types of Crops  
 YEAR 2002

AIN	APN	CropType	Rate	Acres	Water Use
325 001900	325 001900	None	-	-	-
325 001901	325 001901	None	-	-	-
325 001902	325 001902-A	None	-	-	-
325 001902	325 001902-B	None	-	-	-
325 010900	325 010900-A	None	-	-	-
325 010900	325 010900-B	None	-	-	-
325 010901	325 010901-A	Alfalfa	7.0	111.3	779.2
325 010901	325 010901-B	Alfalfa	7.0	114.	03.9
325 010902	325 010902-A	Alfalfa	7.0	109.2	7 4.4
325 010902	325 010902-B	Carrot	4.5	113.	511.1
32 1001900	32 1001900	Alfalfa	7.0	11 .	31.3
32 1001901	32 1001901-A	Alfalfa	7.0	11 .	17.9
32 1001901	32 1001901-B	Alfalfa	7.0	1.2	42 .4
32 1001901	32 1001901-C	Alfalfa	7.0	53.1	371.
32 1009900	32 1009900-A	None	-	-	-
32 1009900	32 1009900-B	Alfalfa	7.0	75.	530.4
32 1009900	32 1009900-C	Alfalfa	7.0	3 .2	253.4
32 1009900	32 1009900-D	Alfalfa	7.0	239.3	1, 75.1
32 1009900	32 1009900-E	None	-	-	-
32 1009900	32 1009900-F	Carrot	4.5	243.4	1,095.2
3590323 0	3590323 0-A	None	-	-	-
3590323 0	3590323 0-B	None	-	-	-
3590323 0	3590323 0-C	None	-	-	-
37401113	37401113 -A	Carrot	4.5	227.3	1,022.7

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1	EXHIBIT "C" Con't					
2	37401113	37401113 -B	None	-	-	-
3	37401113	37401113 -C	None	-	-	-
4	374011195	374011195	Carrot	4.5	30.3	13.2
5	374011203	374011203	Carrot	4.5	1.3	73.2
6	374011211	374011211	Carrot	4.5	27.	125.0
7	374011229	374011229	Carrot	4.5	30.9	139.1
8	37402042	37402042	None	-	-	-
9	374020550	374020550-A	None	-	-	-
10	374020550	374020550-B	None	-	-	-
11	37420003	37420003	None	-	-	-
12	374200293	374200293	None	-	-	-
13	374200301	374200301	None	-	-	-
14	3742003 4	3742003 4	None	-	-	-
15	374200392	374200392	None	-	-	-
16	374200400	374200400	None	-	-	-
17	37420041	37420041	None	-	-	-
18	37420042	37420042	None	-	-	-
19	374200434	374200434	None	-	-	-
20	374200442	374200442	None	-	-	-
21	374200459	374200459	None	-	-	-
22	374200509	374200509	None	-	-	-
23	374200517	374200517	None	-	-	-
24	374200525	374200525	None	-	-	-
25	374200533	374200533	None	-	-	-
26	374200541	374200541	None	-	-	-
27	37420055	37420055	None	-	-	-
28	3742005	3742005	None	-	-	-
29	374200574	374200574	None	-	-	-
30	3742100	3742100	Carrot	4.5	124.9	5 2.2
31	374250017	374250017	Carrot	4.5	103.	4 7.0
32	374250033	374250033	Carrot	4.5	15.0	7.5
33	3744100 2	3744100 2	None	-	-	-
34	374440055	374440055	Carrot	4.5	31.3	140.
35	3744400 3	3744400 3	Carrot	4.5	30.5	137.4
36	374440071	374440071	Carrot	4.5	30.9	139.2
37	3744400 9	3744400 9	Carrot	4.5	30.	137.
38	375020013	375020013-A1	Carrot	4.5	5 .	2 3.5
39	375020013	375020013-A2	Carrot	4.5	55.3	24 .7
40	375020013	375020013-A3	Carrot	4.5	114.4	514.7
41	375020013	375020013-B	None	-	-	-
42					Total:	13,037.0

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EXHIBIT "C" Con't

Antelope Valley-East Kern Water Agency (AVEK)  
 Property Irrigated Lands, Types of Crops  
 YEAR 2003

AIN	APN	CropType	Rate	Acres	Water Use
325 001900	325 001900	None	-	-	-
325 001901	325 001901	None	-	-	-
325 001902	325 001902-A	Onion	4.5	5.9	25.3
325 001902	325 001902-B	Onion	4.5	0.	273.4
325 010900	325 010900-A	None	-	-	-
325 010900	325 010900-B	Carrot	4.5	1.	750.5
325 010901	325 010901-A	Onion	4.5	111.3	500.9
325 010901	325 010901-B	Alfalfa	7.0	114.	03.9
325 010902	325 010902-A	Alfalfa	7.0	109.2	7.4.4
325 010902	325 010902-B	Onion	4.5	113.	511.1
32 1001900	32 1001900	Alfalfa	7.0	11.	31.3
32 1001901	32 1001901-A	Onion	4.5	11.	525.
32 1001901	32 1001901-B	Alfalfa	7.0	1.2	42.4
32 1001901	32 1001901-C	Alfalfa	7.0	53.1	371.
32 1009900	32 1009900-A	Carrot	4.5	11.1	522.3
32 1009900	32 1009900-B	Alfalfa	7.0	75.	530.4
32 1009900	32 1009900-C	Alfalfa	7.0	3.2	253.4
32 1009900	32 1009900-D	Alfalfa	7.0	239.3	1, 75.1
32 1009900	32 1009900-E	None	-	-	-
32 1009900	32 1009900-F	Onion	4.5	243.4	1,095.2
3590323 0	3590323 0-A	Carrot	4.5	9.0	310.4
3590323 0	3590323 0-B	Carrot	4.5	54.4	244.
3590323 0	3590323 0-C	Onion	4.5	45.4	204.3
37401113	37401113 -A	None	-	-	-
37401113	37401113 -B	Carrot	4.5	12.0	57.1
37401113	37401113 -C	Carrot	4.5	117.2	527.2
374011195	374011195	None	-	-	-
374011203	374011203	None	-	-	-
374011211	374011211	None	-	-	-
374011229	374011229	None	-	-	-
37402042	37402042	Carrot	4.5	44.3	199.4
374020550	374020550-A	Carrot	4.5	32.0	144.2
374020550	374020550-B	Carrot	4.5	1.5	749.3
37420003	37420003	Carrot	4.5	11.	525.7
374200293	374200293	Carrot	4.5	3.9	17.5
374200301	374200301	Carrot	4.5	3.	17.0
3742003 4	3742003 4	Carrot	4.5	14.	.
374200392	374200392	Carrot	4.5	14.0	2.9

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EXHIBIT "C" Con't

374200400	374200400	Carrot	4.5	15.3	.7
37420041	37420041	Carrot	4.5	13.4	0.4
37420042	37420042	Carrot	4.5	4.	21.7
374200434	374200434	Carrot	4.5	.	30.
374200442	374200442	Carrot	4.5	7.3	32.9
374200459	374200459	Carrot	4.5	7.0	31.
374200509	374200509	Carrot	4.5	1.9	7.3
374200517	374200517	Carrot	4.5	1.1	72.
374200525	374200525	Carrot	4.5	15.	70.9
374200533	374200533	Carrot	4.5	14.9	7.0
374200541	374200541	Carrot	4.5	3.3	15.0
37420055	37420055	Carrot	4.5	3.	1.0
3742005	3742005	Carrot	4.5	3.	1.2
374200574	374200574	Carrot	4.5	3.5	15.
3742100	3742100	None	-	-	-
374250017	374250017	None	-	-	-
374250033	374250033	None	-	-	-
3744100 2	3744100 2	Carrot	4.5	59.2	2.5
374440055	374440055	None	-	-	-
3744400 3	3744400 3	None	-	-	-
374440071	374440071	None	-	-	-
3744400 9	3744400 9	None	-	-	-
375020013	375020013-A1	None	-	-	-
375020013	375020013-A2	None	-	-	-
375020013	375020013-A3	None	-	-	-
375020013	375020013-B	Carrot	4.5	230.	1,03.5

Total: 15, 40.1

Antelope Valley-East Kern Water Agency (AVEK)  
 Property Irrigated Lands, Types of Crops  
 YEAR 2004

AIN	APN	CropType	Rate	Acres	Water Use
325 001900	325 001900	Carrot	4.5	14.9	7.0
325 001901	325 001901	Carrot	4.5	7.4	33.3
325 001902	325 001902-A	None	-	-	-
325 001902	325 001902-B	None	-	-	-
325 010900	325 010900-A	Alfalfa	7.0	0.	5.54
325 010900	325 010900-B	Alfalfa	7.0	1.	1,17.5
325 010901	325 010901-A	Onion	4.5	111.3	500.9
325 010901	325 010901-B	Alfalfa	7.0	114.	03.9
325 010902	325 010902-A	Alfalfa	7.0	109.2	74.4
325 010902	325 010902-B	Alfalfa	7.0	113.	795.0

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DECLARATION



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EXHIBIT "C" Con't

32 1001900	32 1001900	Alfalfa	7.0	11 .	31.3
32 1001901	32 1001901-A	None	-	-	-
32 1001901	32 1001901-B	Alfalfa	7.0	1.2	42 .4
32 1001901	32 1001901-C	Alfalfa	7.0	53.1	371.
32 1009900	32 1009900-A	Onion	4.5	11 .1	522.3
32 1009900	32 1009900-B	Alfalfa	7.0	75.	530.4
32 1009900	32 1009900-C	Alfalfa	7.0	3 .2	253.4
32 1009900	32 1009900-D	Alfalfa	7.0	239.3	1, 75.1
32 1009900	32 1009900-E	Carrot	4.5	230.2	1,03 .0
32 1009900	32 1009900-F	None	-	-	-
3590323 0	3590323 0-A	None	-	-	-
3590323 0	3590323 0-B	None	-	-	-
3590323 0	3590323 0-C	Carrot	4.5	4 .0	20 .9
37401113	37401113 -A	None	-	-	-
37401113	37401113 -B	None	-	-	-
37401113	37401113 -C	None	-	-	-
374011195	374011195	None	-	-	-
374011203	374011203	None	-	-	-
374011211	374011211	None	-	-	-
374011229	374011229	None	-	-	-
37402042	37402042	None	-	-	-
374020550	374020550-A	None	-	-	-
374020550	374020550-B	None	-	-	-
37420003	37420003	None	-	-	-
374200293	374200293	None	-	-	-
374200301	374200301	None	-	-	-
3742003 4	3742003 4	None	-	-	-
374200392	374200392	None	-	-	-
374200400	374200400	None	-	-	-
37420041	37420041	None	-	-	-
37420042	37420042	None	-	-	-
374200434	374200434	None	-	-	-
374200442	374200442	None	-	-	-
374200459	374200459	None	-	-	-
374200509	374200509	None	-	-	-
374200517	374200517	None	-	-	-
374200525	374200525	None	-	-	-
374200533	374200533	None	-	-	-
374200541	374200541	None	-	-	-
37420055	37420055	None	-	-	-
3742005	3742005	None	-	-	-
374200574	374200574	None	-	-	-
3742100	3742100	None	-	-	-

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**EXHIBIT "C" Con't**

374250017	374250017	None	-	-	-
374250033	374250033	None	-	-	-
3744100 2	3744100 2	None	-	-	-
374440055	374440055	Carrot	4.5	31.3	140.
3744400 3	3744400 3	Carrot	4.5	30.5	137.4
374440071	374440071	Carrot	4.5	30.9	139.2
3744400 9	3744400 9	Carrot	4.5	30.	137.
375020013	375020013-A1	Carrot	4.5	5 .	2 3.5
375020013	375020013-A2	None	-	-	-
375020013	375020013-A3	Carrot	4.5	114.4	514.7
375020013	375020013-B	None	-	-	-
<b>Total:</b>					<b>11, .3</b>

**Antelope Valley-East Kern Water Agency (AVEK)  
 Property Irrigated Lands, Types of Crops  
 YEAR 2011**

<b>AIN</b>	<b>APN</b>	<b>CropType</b>	<b>Rate</b>	<b>Acres2011</b>	<b>Water Use</b>
325 001901	325 001901	None	-	-	-
325 001902	325 001902-B	Alfalfa	7.0	0.	425.3
32 1001901	32 1001901-D	Alfalfa	7.0	.2	477.4
325 001900	325 001900	None	-	-	-
325 010900	325 010900-B	Alfalfa	7.0	1 .	1,1 7.5
325 010902	325 010902-B	Alfalfa	7.0	113.	795.0
32 1001900	32 1001900	Alfalfa	7.0	11 .	31.3
32 1009900	32 1009900-F	None	-	-	-
325 010901	325 010901-B	None	-	114.	-
375020013	375020013-A3	Alfalfa	7.0	114.4	00.
374440055	374440055	None	-	-	-
37420003	37420003	None	-	-	-
3742003 4	3742003 4	None	-	-	-
374011203	374011203	None	-	-	-
374011211	374011211	None	-	-	-
374011195	374011195	None	-	-	-
374011229	374011229	None	-	-	-
3744100 2	3744100 2	None	-	-	-
374200509	374200509	None	-	-	-
374200442	374200442	None	-	-	-
374200293	374200293	None	-	-	-
37420055	37420055	None	-	-	-
3742005	3742005	None	-	-	-
374250017	374250017	Alfalfa	7.0	103.	72 .5
374020550	374020550-B	Alfalfa	7.0	1 .5	1,1 5.

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EXHIBIT "C" Con't

37401113	37401113 -D	Alfalfa	7.0	73.2	512.4
3742100	3742100	None	-	-	-
3590323 0	3590323 0-A	None	-	-	-
37402042	37402042	None	-	-	-
374250033	374250033	Alfalfa	7.0	15.0	104.9
37420042	37420042	None	-	-	-
374200434	374200434	None	-	-	-
374200459	374200459	None	-	-	-
374200301	374200301	None	-	-	-
374200541	374200541	None	-	-	-
374200574	374200574	None	-	-	-
374200400	374200400	None	-	-	-
37420041	37420041	None	-	-	-
374200392	374200392	None	-	-	-
374440071	374440071	None	-	-	-
3744400 9	3744400 9	None	-	-	-
3744400 3	3744400 3	None	-	-	-
374200525	374200525	None	-	-	-
374200517	374200517	None	-	-	-
374200533	374200533	None	-	-	-
375020013	375020013-B	Alfalfa	7.0	230.	1, 15.5
375020013	375020013-A1	Alfalfa	7.0	5 .	409.9
375020013	375020013-A2	Alfalfa	7.0	55.3	3 .9
325 010901	325 010901-A	Alfalfa	7.0	111.3	779.2
325 010902	325 010902-A	Alfalfa	7.0	109.2	7 4.4
32 1009900	32 1009900-A	Alfalfa	7.0	11 .1	12.5
32 1009900	32 1009900-B	Alfalfa	7.0	75.	530.4
32 1009900	32 1009900-C	Alfalfa	7.0	3 .2	253.4
32 1009900	32 1009900-D	Alfalfa	7.0	239.3	1, 75.1
32 1009900	32 1009900-E	None	-	-	-
32 1001901	32 1001901-B	Alfalfa	7.0	1.2	42 .4
374020550	374020550-A	Alfalfa	7.0	32.0	224.3
32 1001901	32 1001901-C	Alfalfa	7.0	53.1	371.
325 001902	325 001902-A	Alfalfa	7.0	5 .9	39 .
325 010900	325 010900-A	Alfalfa	7.0	0.	5 5.4
37401113	37401113 -A	None	-	-	-
37401113	37401113 -E	Alfalfa	7.0	7.2	470.5
3590323 0	3590323 0-C	Alfalfa	7.0	4 .0	321.
3590323 0	3590323 0-B	None	-	-	-
32 1001901	32 1001901-A	Onion	4.5	4 .	21 .9
37401113	37401113 -B	Onion	4.5	54.	24 .7
37401113	37401113 -C	Onion	4.5	49.9	224.
				Total:	17,704.9

LAW OFFICES OF  
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 P.O. BOX 1028  
 RIVERSIDE, CALIFORNIA 92502

1 EXHIBIT "C" Con't

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3 Antelope Valley-East Kern Water Agency (AVEK)  
 4 Property Irrigated Lands, Types of Crops  
 4 YEAR 2012

AIN	APN	CropType	Rate	Acres2012	Water Use
325 001901	325 001901	None	-	-	-
325 001902	325 001902-B	None	-	-	-
32 1001901	32 1001901-D	None	-	-	-
325 001900	325 001900	None	-	-	-
325 010900	325 010900-B	None	-	-	-
325 010902	325 010902-B	None	-	-	-
32 1001900	32 1001900	None	-	-	-
32 1009900	32 1009900-F	None	-	-	-
325 010901	325 010901-B	None	-	-	-
375020013	375020013-A3	Alfalfa	7.0	114.4	00.
374440055	374440055	None	-	-	-
37420003	37420003	None	-	-	-
3742003 4	3742003 4	None	-	-	-
374011203	374011203	None	-	-	-
374011211	374011211	None	-	-	-
374011195	374011195	None	-	-	-
374011229	374011229	None	-	-	-
3744100 2	3744100 2	None	-	-	-
374200509	374200509	None	-	-	-
374200442	374200442	None	-	-	-
374200293	374200293	None	-	-	-
37420055	37420055	None	-	-	-
3742005	3742005	None	-	-	-
374250017	374250017	Alfalfa	7.0	103.	72 .5
374020550	374020550-B	Alfalfa	7.0	1 .5	1,1 5.
37401113	37401113 -D	Alfalfa	7.0	73.2	512.4
3742100	3742100	None	-	-	-
3590323 0	3590323 0-A	None	-	-	-
37402042	37402042	None	-	-	-
374250033	374250033	Alfalfa	7.0	15.0	104.9
37420042	37420042	None	-	-	-
374200434	374200434	None	-	-	-
374200459	374200459	None	-	-	-
374200301	374200301	None	-	-	-
374200541	374200541	None	-	-	-
374200574	374200574	None	-	-	-
374200400	374200400	None	-	-	-
37420041	37420041	None	-	-	-
374200392	374200392	None	-	-	-

LAW OFFICES OF  
 BEST BEST & KRIEGER LLP  
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EXHIBIT "C" Con't

374440071	374440071	None	-	-	-
3744400 9	3744400 9	None	-	-	-
3744400 3	3744400 3	None	-	-	-
374200525	374200525	None	-	-	-
374200517	374200517	None	-	-	-
374200533	374200533	None	-	-	-
375020013	375020013-B	Alfalfa	7.0	230.	1, 15.5
375020013	375020013-A1	Alfalfa	7.0	5 .	409.9
375020013	375020013-A2	Alfalfa	7.0	55.3	3 .9
325 010901	325 010901-A	None	-	-	-
325 010902	325 010902-A	None	-	-	-
32 1009900	32 1009900-A	None	-	-	-
32 1009900	32 1009900-B	None	-	-	-
32 1009900	32 1009900-C	None	-	-	-
32 1009900	32 1009900-D	None	-	-	-
32 1009900	32 1009900-E	None	-	-	-
32 1001901	32 1001901-B	None	-	-	-
374020550	374020550-A	Alfalfa	7.0	32.0	224.3
32 1001901	32 1001901-C	None	-	-	-
325 001902	325 001902-A	None	-	-	-
325 010900	325 010900-A	None	-	-	-
37401113	37401113 -A	None	-	-	-
37401113	37401113 -E	Alfalfa	7.0	7.2	470.5
3590323 0	3590323 0-C	None	-	-	-
3590323 0	3590323 0-B	None	-	-	-
32 1001901	32 1001901-A	None	-	-	-
37401113	37401113 -B	Onion	4.5	54.	24 .7
37401113	37401113 -C	Onion	4.5	49.9	224.
				Total:	, .7

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**PROOF OF SERVICE**

**STATE OF CALIFORNIA }  
COUNTY OF SAN BERNARDINO }**


I am employed in the County of the San Bernardino, State of California. I am over the age of 18 and not a party to the within action; my business address is 1839 Commercenter West, San Bernardino, California.

On January 31, 2013, I served the foregoing document(s) described as: **DECLARATION OF DR. HONG-LIE QIU IN LIEU OF DEPOSITION TESTIMONY FOR PHASE 4 TRIAL (AVEK)** on the interested parties in this action served in the following manner:

**XX** BY ELECTRONIC SERVICE AS FOLLOWS by POSTING the document(s) listed above to the Santa Clara website in the action of the *Antelope Valley Groundwater Litigation*, Judicial Council Coordination Proceeding No. 4408, Santa Clara Case No. 1-05-CV-049053.

**X** (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on January 31, 2013, at San Bernardino, California.

  
\_\_\_\_\_  
P. Jo Anne Quihuis