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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, CENTRAL DISTRICT

Coordination Proceeding
Special Title (Rule 1550(b))

ANTELOPE VALLEY GROUNDWATER
CASES

Including Consolidated Actions:

Los Angeles County Waterworks District
No. 40 v. Diamond Farming Co.; Superior
Court of California, County of Los Angeles,
Case No. BC325201 (formerly BC325201);

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 Dist.; Superior Court of
California, County of Riverside,
consolidated actions, Case Nos. RIC 353840,
RIC 344436, RIC 344668;

AND RELATED ACTIONS.

Judicial Council Coordination
Proceeding No. 4408

Santa Clara Case No. 1-05-CV-049053

**DECLARATION OF THEODORE A.
CHESTER, JR. IN SUPPORT OF
NOTICE OF MOTION AND
MOTION TO INTERVENE IN
JUDGMENT**

(Filed concurrently with the Notice of
Motion and Motion to Intervene in
Judgment; Memorandum of Points &
Authorities in support of Motion to
Intervene; Declaration of Veena P.
Beglinger in support of Motion to
Intervene; and [Proposed] Order)

Hearing Date: To Be Set By The Court
Time: To Be Set By The Court
Judge: Hon. Jack Komar
Dept.: Dept 17

[Hearing to be conducted by CourtCall]

I, THEODORE A. CHESTER, JR., declare as follows:

1. I am counsel of record for Bruce Burrows and 300 A 40 H, LLC, a
California limited liability company, parties to the within action, and as such, have the

1 make this declaration. I am duly licensed to practice law in the State of California. I have
2 personal knowledge of the matters set forth herein, and if called as a witness, could and
3 would competently testify thereto.

4 2. Prior to filing this Motion, on June 15, 2022, I spoke with Mr. Craig Parton,
5 General Counsel for the Antelope Valley Watermaster. I informed Mr. Parton that this
6 Motion and supporting documents were near completion, and I requested confirmation
7 the Watermaster stipulated to this Motion. In response thereto, Mr. Parton informed me
8 that I have his authority to represent to the Court that *the Watermaster does hereby*
9 *stipulate to entry of Orders granting 40AA Water Holdings LLC, a Delaware limited*
10 *liability company leave to intervene in this Action.* Mr. Parton also instructed me to
11 prepare this Declaration, and thereby inform this Court that he does stipulate, on behalf
12 of the Watermaster, to entry of Orders granting 40AA Water Holdings LLC, a Delaware
13 limited liability company, leave to intervene in this Action, and thereby become a named
14 Party to the Judgment herein. *Mr. Parton informed me that my Declaration to this*
15 *effect, as an Officer of the Court, is sufficient to constitute the Watermaster's*
16 *Stipulation to the relief requested herein.*

17 I declare under penalty of perjury under the laws of the State of California that
18 the foregoing is true and correct.

19 Executed on June 30, 2022, at Los Angeles, California.

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22 THEODORE A. CHESTER, JR.