

Exhibit 11

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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

Coordination Proceeding
Special Title (Rule 1550 (b))

**ANTELOPE VALLEY GROUNDWATER
CASES**

Included Consolidated Actions:

Los Angeles County Waterworks District No.
40 v. Diamond Farming Co.
Superior Court of California
County of Los Angeles, Case No. BC 325 201

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

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 353 840, RIC 344 436, RIC 344 668

Rebecca Lee Willis v. Los Angeles County
Waterworks District No. 40
Superior Court of California, County of Los
Angeles, Case No. BC 364 553

Judicial Council Coordination
Proceeding No. 4408

[Assigned to The Honorable Jack Komar, Judge
Santa Clara County Superior Court, Dept. 17]

Lead Case No. BC 325 201

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

**SECOND AMENDED CASE MANAGEMENT
ORDER**

Judge: Honorable Jack Komar

1 The following proposed First Amended Case Management Order for settlement approval
2 hearings related to settlement of the Small Pumper Class claims and a more global settlement among the
3 majority of parties was proposed by the Small Pumper Class and joined by a number of other parties.
4 The proposed First Amended Case Management Order came before the Court pursuant to an Ex Parte
5 Application to Amend the Case Management Order, entered on November 4, 2014, which was heard at
6 the Case Management Conference on January 22, 2015. The Court, being fully advised, adopts and
7 revises the schedule as follows:

8 1. The deadline for filing Stipulation(s) for Entry of Judgment by the Stipulating
9 Parties shall be **February 26, 2015**. Upon the filing of the Stipulations, the following procedures are
10 established for the approval of the Small Pumper Class settlement and the Proposed Judgment and
11 Physical Solution.

12 2. The Small Pumper Class Motion for Preliminary Approval of the proposed Small
13 Pumper Class settlement shall be scheduled for hearing on **March 19, 2015 at 9:00 a.m.** The hearing
14 will do the following:

15 a. Preliminary presentation of Settlement, including Physical Solution, to the
16 Court;

17 b. Determine the Small Pumper Class membership closing date shall be the
18 date of final approval of the Small Pumper Class settlement, with notice of same to
19 be sent out in the Small Pumper Class notice of settlement;

20 c. Set a deadline of **April 6, 2015** for the mailing of the Class notice;

21 d. Determine and Order the Form of Notice to Class;

22 e. Set a deadline of **May 15, 2015** for objections to the Small Pumper Class
23 Settlement;

24 f. Set a date of **August 3, 2015** for the Fairness/Final Approval hearing to
25 take place at the same date and time as the Court hearing on the approval of the
26 Stipulated Judgment and Physical Solution. The hearing will be held in Los
27 Angeles starting at 9:00 a.m.
28

1 3. Subject to the prior Orders of the Court, written statement of objections to the
2 proposed Stipulated Judgment and Physical Solution, and any assertion of claims or rights to produce
3 groundwater from the Basin by a Non-Stipulating Party, shall be due no later than April 7, 2015. Parties
4 not part of the agreement are to advise the Court of their desire to separately adjudicate their claims by
5 no later than April 7, 2015.

6 4. Disclosure of witnesses and exhibits regarding any objections to the Proposed
7 Stipulated Judgment and Physical Solution, assertion of claims or rights to produce groundwater from
8 the Basin by Non-Stipulating Parties, the Public Water Suppliers claim of prescription, and the prove-up
9 by the Stipulating Parties for the Stipulated Judgment and Physical Solution shall be due no later than
10 April 27, 2015.

11 5. Discovery regarding objections to the proposed Stipulated Judgment and Physical
12 Solution, claim of prescription, and any assertion of claims or rights of by Non-Stipulating Parties shall
13 be completed by July 17, 2015.

14 6. Trials or hearings on final approval of the Small Pumper Class Settlement and on
15 prove-up of the Stipulated Judgment and Physical Solution shall commence on August 3, 2015, and
16 continuing through August 7, 2015, and if necessary, August 17 through August 21, 2015. Subject
17 to further orders and scheduling of the Court, such trial or hearings shall include the taking of evidence
18 regarding the following subjects:

- 19 a. Prescription by the Public Water Suppliers;
20 b. Prove-up by Stipulating Parties;
21 c. Proof of claim to produce groundwater by Non-Stipulating Parties;
22 d. Prove-up of defaults;
23 e. Prove-up of Physical Solution;
24 f. Fairness and final approval of the Small Pumper Class Settlement.

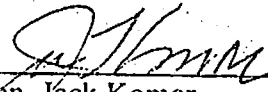
25 7. Within thirty (30) days of the final approval by the Court of the Small Pumper
26 Class Settlement, the Small Pumper Class shall file with the Court either:

- 27 a. A stipulation providing for payment of attorneys' fees and expert fees and
28 costs;

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b. A petition for payment of attorneys' fees and expert fees and cost.

Dated: MAR 27 2015



Hon. Jack Komar
Judge of the Superior Court

Exhibit 12

1 Robert H. Brumfield, III (State Bar No. 114467)
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3 BRUMFIELD & HAGAN, LLP
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9 Attorneys for Mark Ritter, Successor Trustee of the
10 Ritter Family Trust

11
12 SUPERIOR COURT OF THE STATE OF CALIFORNIA
13 COUNTY OF LOS ANGELES – CENTRAL DISTRICT

14 ANTELOPE VALLEY
15 GROUNDWATER CASES

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19 Court of California, County of Los
20 Angeles, Case No. BC 325201

21 Los Angeles County Waterworks District
22 No. 40 v. Diamond Farming Co., Superior
23 Court of California, County of Kern, Case
24 No. S-1500-CV-254348

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

Judicial Council Coordination No. 4408

CLASS ACTION

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

**CASE MANAGEMENT CONFERENCE
STATEMENT OF MARK RITTER,
SUCCESSOR TRUSTEE OF THE RITTER
FAMILY TRUST**

Date: September 4, 2015

Time: 1:30 p.m.

Place: Santa Clara County Superior Court
(via CourtCall)

21 Mark Ritter, Successor Trustee of the Ritter Family Trust (hereinafter “Ritter Family
22 Trust”), hereby respectfully submits his Case Management Conference Statement as follows:

23 Mark Ritter’s mother, Paula E. Ritter, and his father, Edgar C. Ritter, were formerly the
24 Trustees of the Ritter Family Trust. According to the attorney for the Antelope Valley Ground
25 Water Agreement Association (“AGWA”), Michael T. Fife, the Ritter Family Trust was
26 approached about becoming involved as a part of the AGWA in this litigation.
27

28 While Mark Ritter does not know what exactly happened, as both his father Edgar and

1 mother Paula are now deceased, undersigned counsel searched the court's docket and determined
2 that an answer and cross complaint was filed by Mr. Fife's office on behalf of Edgar C. Ritter,
3 Paula E. Ritter, and Paula E. Ritter as Trustee of the Ritter Family Trust, with the answer being
4 filed January 2, 2007 and a first amended cross-complaint of the AGWA being filed January 26,
5 2007. Mark Ritter was unaware of these filings until undersigned counsel located them just prior
6 to a meeting with Mr. Ritter on August 14, 2015. Thereafter, Mr. Ritter engaged undersigned
7 counsel to represent him in this case.

8 Counsel for the AGWA has indicated that nothing was done on behalf of the Ritter Family
9 Trust, despite the fact that Mr. Fife's firm continues as counsel of record for the Ritter Family
10 Trust, and now the Ritter Family Trust finds it in a position where it's counsel of record did not
11 take steps to represent its client nor did it not substitute out of said representation. All of these
12 actions occurred prior to the time Mark Ritter was successor trustee and prior to the time Mark
13 Ritter ever even knew about this particular litigation.

14 The Ritter Family Trust does pump groundwater every year and primarily grows alfalfa.
15 Records are currently being obtained as to its water production which has occurred for many
16 years in the past.

17 In fairness to the Ritter Family Trust, undersigned counsel would request that the court
18 sever it from the upcoming trial in September 28, 2015, and allow it the opportunity to produce
19 documents as to its water usage and to conceivably be included in a settlement or at least allow at
20 the opportunity to prove up its use at a subsequent hearing.

21 Counsel does not want to unduly delay the issues, but because of the representation issue
22 referenced above and now the obvious need of the Ritter Family Trust to protect his own interests
23 and obtain its own counsel, this request is being made in fairness. Undersigned counsel will also
24 request that Mr. Fife's office formally execute a substitution of attorneys substituting in
25 Brumfield & Hagan in place of Mr. Fife's firm. Accordingly, the Ritter Family Trust requests
26 that it be allowed time to gather such documents and evidence as may be necessary to support its
27 claims in these cases and to present that to the court at a later time.

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Dated: September 3, 2015

BRUMFIELD & HAGAN, LLP
A Limited Liability Partnership


By: 
Robert H. Brumfield, III
Attorneys for Mark Ritter, Successor Trustee
of the Ritter Family Trust

Exhibit 13

Exhibit 14



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* Edgar (Pete) Ritter; Rancher

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Edgar (Pete) Ritter, co-owner of Ritter & Godde Ranch in Lancaster, has died in Lancaster. He was 61.

A lifelong Antelope Valley resident, Ritter died Thursday of a heart attack, said his wife, Paula Ritter.

Born in Palmdale, Ritter worked on his family's ranch in Leona Valley during his childhood. After graduating from Antelope Valley High School in 1949, Ritter became business partners with Forrest Godde. The pair ran local alfalfa ranches and, in 1959, purchased 1,000 acres in west Lancaster that they named Ritter & Godde Ranch. Ritter worked on the alfalfa ranch until the time of his death.

He was a member of the Los Angeles County Farm Bureau and the Lancaster Elks Club.

In addition to his wife of 37 years, Ritter is survived by his son, Mark Ritter of Lancaster; daughter, Andria Mayfield of Quartz Hill; brothers, Ralph Ritter of Phelan, Calif., and John Ritter of Yerington, Nev.; sister, Susie Tatum of Burden, Kan., and six grandchildren.

Visitation is planned for noon today, with a 1 p.m. funeral at Halley-Olsen Funeral Chapel, 44802 N. Date Ave., Lancaster. Burial will follow at Lancaster Cemetery. Donations can be made in Ritter's name to the Antelope Valley 4-H Council, in care of Dana Ritter, 51201 90th St. West, Lancaster 93536.

FROM THE ARCHIVES

National Briefing / Colorado

January 4, 2009



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Your Daily Dish

Exhibit 15



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RITTER, PAULA ELAINE

RITTER, Paula Elaine Age 76, passed away November 30, 2010, in Lancaster, California. She was born April 30, 1934, in Elmhurst, Illinois and has lived in the Antelope Valley since 1945. In 1954, Paula married Pete Ritter of the Ritter family who pioneered the Antelope Valley. She and her husband were longtime Westside farmers here in the Antelope Valley. Paula enjoyed reading, painting, and cross stitching. She is survived by one daughter and one son, Andria Mayfield of Antelope Acres, Mark Ritter and his wife Dana of Lancaster, six grandchildren, Paul Mayfield of Antelope Acres, Kenny Mayfield and his wife Coryanne of Alameda, Marissa Larson and her husband Jake of Ft. Drumm, N.Y., Bonnie Schaefer and her husband Chris of Rosamond, Annie and Pete Ritter both of Lancaster, four great-grandchildren, Vincent, Connor and Alexis Mayfield and Gracie Schaefer. Funeral services will be held at 11 a.m., Tuesday, December 7, 2010, at Halley-Olsen- Murphy, Lancaster Chapel. Interment to follow at Lancaster District Cemetery. www.homlancaester.com

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