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10 Attorneys for Defendant CITY OF LOS ANGELES and
LOS ANGELES WORLD AIRPORTS

11 Attorneys for Cross-Defendants City of Los
12 Angeles and Los Angeles World Airports

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

16 Coordination Proceeding

Judicial Council Coordination
Proceeding No. 4408

17 ANTELOPE VALLEY GROUNDWATER
18 CASES,

**SETTLING PARTIES' (1) JOINDER IN
WATERMASTER'S OPPOSITION TO
ANTELOPE VALLEY RESOURCE
CONSERVATION DISTRICT'S MOTION
TO INTERVENE AND SET
EVIDENTIARY HEARING REGARDING
WATER PUMPING RIGHTS, and (2)
NOTICE THAT ATTORNEY WEEKS
MAY BE MATERIAL WITNESS**

19 Los Angeles County Waterworks District No.
40 v. Diamond Farming Co.

20 Los Angeles County Waterworks District No.
21 40 v. Diamond Farming Co.

22 Wm Bolthouse Farms, Inc. v. City of
Lancaster

The Hon. Jack Komar, Dept. 17
Santa Clara Case No. 105 CV 049053

23 Diamond Farming Co. v. City of Lancaster

24 Diamond Farming Co. v. Palmdale Water
25 District,

Riverside County Superior Court
Lead Case No. RIC 344436
Case No. RIC 344668
Case No. RIC 353840

26 AND RELATED ACTIONS

Los Angeles Superior Court Case
No. BC 325201
Kern County Superior Court Case
No. S-1500-CV-254348

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2325394.1 1351-007

SETTLING PARTIES' (1) JOINDER IN WATERMASTER'S OPPOSITION TO ANTELOPE VALLEY RCD'S
MOTION TO INTERVENE AND SET EVIDENTIARY HEARING REGARDING WATER PUMPING RIGHTS,
and (2) NOTICE THAT ATTORNEY WEEKS MAY BE MATERIAL WITNESS

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A. Joinder

The City of Los Angeles and Los Angeles World Airports, Grimmway Enterprises, and County Sanitation Districts of Los Angeles County Nos. 14 and 20 (collectively, "Settling Parties") hereby join in the Watermaster's Opposition to the ANTELOPE VALLEY RESOURCE CONSERVATION DISTRICT'S ("Conservation District") Motion to Intervene and Set Evidentiary Hearing Regarding Water Pumping Rights.

B. Notice That Attorney Weeks is a Witness


The Settling Parties anticipate that the Conservation District's notice of and knowledge regarding the Antelope Valley Adjudication and resulting Judgment will be a contested issue. The Conservation District is represented by Bradley Weeks of Charlton Weeks LLP ("Weeks") who has also represented Quartz Hill Water District ("Quartz Hill") in this proceeding since August 18, 2008. (See Substitution of Attorney, Glo Trans Doc # 1838) Quartz Hill is a Public Water Supplier and Exhibit 3 party to the Judgment.

Minutes of the Conservation District indicate that Weeks was and has been counsel to the Conservation District since at least September 2006 and discussed the Adjudication with the Conservation District Board. California Rules of Professional Conduct, Rule 3.7(a) precludes an attorney from acting as an advocate in a trial in which the attorney is likely to be a witness on a contested issue or matter, without informed written consent from the client.

The Settling Parties anticipate that Weeks will be a material witness who will be deposed and perhaps cross-examined at trial regarding the Conservation District's notice of and knowledge regarding the Adjudication. The Settling Parties provide this advanced notice so that the Conservation District can address the issue promptly.

DATED: December 6, 2022


KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD
A Professional Corporation

By: 
Eric N. Robinson
Attorneys for Defendant CITY OF LOS ANGELES and LOS ANGELES WORLD AIRPORTS

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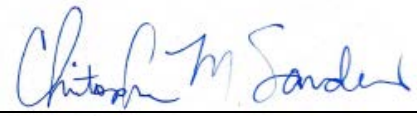
DATED: December 6, 2022

LEBEAU THELEN LLP

By: 
Robert G. Kuhs
Attorneys for GRIMMWAY ENTERPRISES

DATED: December 6, 2022

ELLISON, SCHNEIDER, HARRIS & DONLAN LLP

By: 
Christopher M. Sanders
Attorneys for COUNTY SANITATION
DISTRICTS OF LOS ANGELES COUNTY NOS.
14 AND 20

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF SACRAMENTO

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Sacramento, State of California. My business address is 1331 Garden Hwy, 2nd Floor, Sacramento, CA 95833.

On December 6, 2022, I served true copies of the following document(s) described as **SETTLING PARTIES' (1) JOINDER IN WATERMASTER'S OPPOSITION TO ANTELOPE VALLEY RESOURCE CONSERVATION DISTRICT'S MOTION TO INTERVENE AND SET EVIDENTIARY HEARING REGARDING WATER PUMPING RIGHTS, AND (2) NOTICE THAT ATTORNEY WEEKS MAY BE MATERIAL WITNESS** on the interested parties in this action as follows:

BY E-MAIL OR ELECTRONIC TRANSMISSION: By submitting an electronic version of the document(s) to the parties, through the user interface at avwatermaster.org.

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

Executed on December 6, 2022, at Sacramento, California.

Sherry Ramirez