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Exempt from Filing Fees  
Government Code § 6103

7 Attorney for Antelope Valley Resource Conservation District  
8 Intervenor

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 FOR THE COUNTY OF LOS ANGELES

11 ANTELOPE VALLEY GROUNDWATER  
12 CASES

Judicial Council Coordination Proceeding No.  
4408

13 Included Consolidated Actions:

Lead Case No. BC325201

14 Los Angeles County Waterworks District No.  
15 40 v. Diamond Farming Co. Superior Court of  
16 California County of Los Angeles, Case No.  
17 BC 325 201

DECLARATIONS IN SUPPORT OF  
ANTELOPE VALLEY RESOURCE  
CONSERVATION DISTRICT MOTION  
FOR LEAVE TO INTERVENE

18 Los Angeles County Waterworks District No.  
19 40 v. Diamond Farming Co. Superior Court of  
20 California, County of Kern, Case No. S-1500-  
21 CV-254-348

Date: October 25, 2022  
Time: 9:00 a.m.  
Location: 191 N. 1st Street, Department TBA,  
San Jose, CA 95113  
Assigned Judge: Hon. Jack Komar (Ret.)

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

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

Richard A. Wood v. Los Angeles County  
Waterworks District No. 40 Superior Court of  
California, County of Los Angeles, Case No.  
BC 391 869

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Antelope Valley Resource Conservation District offers the following declarations in support of its Motion For Leave To Intervene.

1. Debra Gillis-Bradley
2. Neal Weisenberger
3. Bradley T. Weeks

CHARLTON WEEKS LLP



Dated: July 28, 2022

Bradley T. Weeks  
Attorney for Antelope Valley Resource Conservation District, Intervenor

DECLARATION ONE

CHARLTON WEEKS LLP

ELECTRONIC  
DECLARATION TAB

DECLARATION ONE

**DECLARATION OF DEBRA GILLIS-BRADLEY**

I, Debra Gillis-Bradley, declare as follows.

1. If called to testify as a witness in the above mentioned matter, I could competently testify to the following matters, which are within my personal knowledge.

2. All of the exhibits referenced in this declaration are attached to the concurrently filed Exhibits in Support of Motion to Intervene.

3. I am the general manager of the Antelope Valley Resource Conservation District (“AVRCD”) in this matter.

4. I am familiar with the business records of the Antelope Valley Resource Conservation District.

5. Exhibits 1, 2, 4, and 5 are business records I obtained from the Antelope Valley Resource Conservation District business records.

6. AVRCD owes the real property commonly known as 10148 West Avenue I, Lancaster, California, 93536 (hereafter “Property”). This Property is located in the Antelope Valley Adjudication Area. This property has one groundwater well. That well has been supplying water for the Property since 1953. The Property has no other source of water. Water has not been delivered to the Property from another source. The water pumped on the Property has not been delivered to other properties.

7. The water use on the Property is for a nursery and for two residences located on the property. The residences were for use by District employees, who work at the property. Since the time the AVRCD has leased the property, it has been used as a nursery.

8. This well is used by the United States Geological Survey for groundwater monitoring. Every year the USGS determines the water level and also shares this information with the AVRCD. Exhibit Six is a compilation of these groundwater levels based upon these tests.


9. The purpose of the nursery is to grow species of plants native to the Antelope Valley and to contract grow drought tolerant plants in greenhouses for governmental organizations. Local plants prosper in the High Desert climate of the Antelope Valley. By nature,

1 these plants use a very small amount of water. The AVRCD also assist the public by growing  
2 native and drought tolerant plant for use in landscaping and public spaces.

3 10. The AVRCD wishes to continue to assist the public by providing education and  
4 native plants for landscaping.

5  
6 I declare under penalty of perjury under the laws of the State of California the foregoing is  
7 true and correct.

8  
9 Date: 7.27.2022

  
Debra Gillis-Bradley

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DECLARATION TWO

CHARLTON WEEKS LLP

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DECLARATION TAB

DECLARATION TWO

CHARLTON WEEKS LLP  
1031 West Avenue M-14, Suite A  
Palmdale, CA 93551

**DECLARATION OF NEAL WEISENBERGER**

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I, Neal Weisenberger, declare as follows.

1. If called to testify as a witness in the above mentioned matter, I could competently testify to the following matters, which are within my personal knowledge.

2. I am a Professor of Agriculture, Landscape Construction and Botany – Retired. I am a resident of the Antelope Valley, and I taught agricultural topics at the Antelope Valley Community College for most of my carrier.

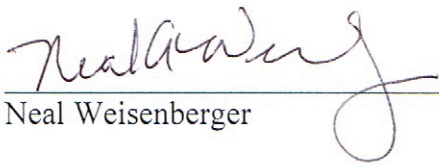
3. I am also the president of the Antelope Valley Resource Conservation District.

4. I prepared Exhibit Seven, attached to the Exhibits in Support of Antelope Valley Resource Conservation District Motion For Leave to Intervene, from the University of California, California Agriculture website.

5. I calculated historical water use of the District by calculating the applied crop water duties of grass, multiplied by the area of containerized plants on the property. A crop water duty is the amount of water needed to sustain a crop, based upon the local evaporative transpiration rate, and other factors. I estimate the historical water use on the Property prior to 2015 is approximately eighteen acre feet per year.

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

Date: 7/27/2022

  
\_\_\_\_\_  
Neal Weisenberger

DECLARATION THREE

CHARLTON WEEKS LLP

ELECTRONIC  
DECLARATION TAB

DECLARATION THREE



**DECLARATION OF BRADLEY T. WEEKS**

I, Bradley T. Weeks, declare as follows.

1. If called to testify as a witness in the above mentioned matter, I could competently testify to the following matters, which are within my personal knowledge.

2. I am an attorney licensed to practice law in the State of California. I represent the Antelope Valley Resource Conservation District in this matter.

3. I have consulted with the Watermaster Engineer and sought the Watermaster's stipulation to the proposed intervention.

4. On March 24, 2022, and on other dates, Craig A. Parton, of Price, Postel, and Parma LLP, attorneys for the Antelope Valley Watermaster, agreed the Antelope Valley Resource Conservation District could intervene in the Antelope Valley Groundwater Cases, Judicial Council Coordination Proceeding No. 4408.

5. I obtained Exhibit Three, attached to the Exhibits in Support of Antelope Valley Resource Conservation District Motion For Leave to Intervene, from the University of California, California Agriculture website.

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

Date: July 28, 2022



Bradley T. Weeks