

1 SmithTrager LLP  
2 Susan M. Trager, Esq. (SBN 58497)  
3 Summer L. Nastich, Esq. (SBN 229985)  
4 Laurel E. Adcock, Esq. (SBN 234201)  
5 19712 MacArthur Blvd., Suite 120  
6 Irvine, CA 92612  
7 Telephone: (949) 752-8971  
8 Facsimile: (949) 863-9804  
9 smt@smithtrager.com

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6 Attorneys for Defendant and Cross-Complainant  
7 Phelan Piñon Hills Community Services District

8  
9 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
10 FOR THE COUNTY OF LOS ANGELES - CENTRAL DISTRICT

11 Coordination Proceeding  
12 Special Title (Rule 1550(b))

Judicial Council Coordination Proceeding  
No. 4408

13 **ANTELOPE VALLEY**  
14 **GROUNDWATER CASES**

For Filing Purposes Only: Santa Clara  
County Case No.: 1-05-CV-049053

15 Included Actions:

Assigned to the Honorable Jack Komar,  
Department 17

16 *Los Angeles County Waterworks District*  
17 *No. 40 v.*  
18 *Diamond Farming Co., et al.,*  
19 *Los Angeles County Superior Court, Case*  
20 *No. BC 325 201*

CASE MANAGEMENT STATEMENT OF  
PHELAN PIÑON COMMUNITY  
SERVICES DISTRICT

21 *Los Angeles County Waterworks District*  
22 *No. 40 v.*  
23 *Diamond Farming Co., et al.,*  
24 *Kern County Superior Court, Case No.*  
25 *S-1500-CV-254-348*

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

AND RELATED CROSS-ACTIONS

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1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD HEREIN:

2 Phelan Piñon Hills Community Services District ("PPHCSD") has participated in the  
3 Antelope Valley Mediation Principals ("Principals") efforts, and participated in the August 24,  
4 2010 mediation before Justice Ronald Robie. Representatives selected by the Principals will  
5 continue negotiations on behalf of the Principals with the public water purveyors and the United  
6 States on matters of mutual concern. PPHCSD will continue to coordinate with the Principals  
7 and the representatives in these negotiations. Justice Robie has targeted December 1, 2010, as  
8 the date for the parties to reach agreement on the terms of a settlement.

9 PPHCSD has designated its expert for the safe yield trial. PPHCSD filed and served its  
10 expert witness report entitled *Analysis of Historical Groundwater Production by the Phelan*  
11 *Piñon Hills Community Services District*.

12 Parties are discussing convenient dates for expert depositions and the expert depositions  
13 should commence on or after September 20, 2010.


14 Pre-trial discovery is anticipated to be concluded in advance of trial.

15 PPHCSD will be in a better position to estimate the number and extent of *in limine*  
16 motions at the future case management conference.

17 PPHCSD's estimate of the scope and length of trial is not likely to change even if  
18 settlement is achieved among some of the parties because expert evidence must be presented to  
19 address arguments by non-settling parties, and for the purposes of proving up on the condition of  
20 the basin, to assist in the determination of safe yield.

21  
22 Dated: September 3, 2010

SmithTrager LLP

23  
24  
25 By   
26 Susan M. Trager  
27 Attorneys for Defendant and Cross-  
28 Complainant Phelan Piñon Hills  
Community Services District

3 **PROOF OF SERVICE**

4 I, Marie W. Young, declare:

5 I am employed in the County of Orange, State of California. I am over the age of 18 and  
6 am not a party to the within action; my business address is 19712 MacArthur Blvd., Suite 120,  
Irvine, California 92612.

7 On September 3, 2010, I served the foregoing documents(s) described as **CASE**  
8 **MANAGEMENT STATEMENT OF PHELAN PINON HILLS COMMUNITY**  
**SERVICES DISTRICT**, as follows:

9 X **(ELECTRONIC SERVICE)** By posting the document(s) listed above to the Santa Clara  
10 County Superior Court website in regard to the Antelope Valley Groundwater matter  
pursuant to the Court's Clarification Order. Electronic service and electronic posting  
completed through www.scefiling.org.

11 \_\_\_\_\_ **(REGULAR MAIL)** By enclosing the document(s) listed in sealed envelope(s),  
12 addressing as shown below, and placing the envelope for collection and mailing  
following our ordinary business practices. I am readily familiar with this firm's practice  
13 for collection and processing correspondence for mailing. On the same day that  
correspondence is placed for collection and mailing, it is deposited in the ordinary course  
14 of business with the United States Postal Service in a sealed envelope with postage fully  
prepaid. I am aware that on motion of the party served, service is presumed invalid if  
15 postal cancellation date or postage meter date is more than one day after date of deposit  
for mailing in affidavit.

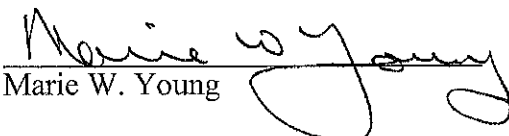
16 \_\_\_\_\_ **(FEDERAL EXPRESS)** By placing the document(s) listed above in a sealed overnight  
17 envelope, with delivery fees paid or provided for; addressed as shown below, and  
depositing it for overnight delivery at a facility regularly maintained by the express  
18 service carrier or delivered to a courier or driver authorized to receive documents on its  
behalf, for delivery on the next business day.

19 \_\_\_\_\_ **(FACSIMILE)** by transmitting the document(s) listed above via facsimile to the office of  
20 the addressee(s) shown below. A true and correct copy of the transmission report  
indicating transmission without error is attached hereto.

21 \_\_\_\_\_ **(PERSONAL SERVICE)** By delivering the document(s) listed above in a sealed  
22 envelope addressed to the parties as noted by hand to the offices of the addressee.

23  
24 I declare under penalty of perjury under the laws of the State of California that the foregoing  
is true and correct.

25 Executed this 3rd day of September, 2010, in Irvine, California.

26   
27 Marie W. Young  
28