CARMEN A. TRUTANICH, Los Angeles City Attorney 1 RICHARD M. BROWN, General Counsel Water and Power 2 JULIE C. RILEY (SBN 197407) **Deputy City Attorney** 3 111 North Hope Street, Suite 340 4 P. O. Box 51111 Los Angeles, California 90051-0100 5 Telephone: (213) 367-4500 Facsimile: (213) 367-4588 6 Attorneys for Defendant, 7 CITY OF LOS ANGELES, ACTING BY AND THROUGH THE LOS ANGELES DEPARTMENT 8 OF WATER AND POWER (DWP) 9 SUPERIOR COURT OF THE STATE OF CALIFORNIA 10 FOR THE COUNTY OF LOS ANGELES 11 12 **ANTELOPE VALLEY** Case No. 1-05-CV049053 **GROUNDWATER CASES** 13 Judicial Council Coordination Proceeding Los Angeles County Waterworks District No. 4408 14 No. 40 v. Diamond Farming Co. **DEFENDANT CITY OF LOS ANGELES'** 15 Wm, Bolthouse Farms, Inc. v. City of CASE MANAGEMENT STATEMENT Lancaster 16 Riverside County Superior Court Diamond Farming Co. v. City of Lancaster Lead Case No. ÁIC 344436 17 Case No. RIC 344668 Diamond Farming Co. v. Palmdale Water Case No. 353840 18 District Los Angeles Superior Court 19 Case No. BC 325201 20 Kern County Superior Court Case No. S-1500-CV-254348 21 22 23 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD HEREIN: 24 The City of Los Angeles (City) participated in mediation before Justice Ronald Robie 25 on August 24, 2010. Representatives selected by the "Waldo Group" said they will commence negotiations on behalf of the group with the public water purveyors on matters 26 of mutual concern. The City will also participate in these negotiations. These negotiations 27 28 231925 DEFENDANT CITY OF LOS ANGELES' CASE MANAGEMENT STATEMENT

are to be concluded no later than December 1, 2010. These negotiations will cease if the January 4, 2011, safe yield trial is continued.

Experts have been designated for the safe yield trial. Parties are discussing convenient dates for expert depositions and the expert depositions should commence on or after September 20, 2010. Pre-trial discovery should be finished in advance of trial. We will be in a better position to estimate number and extent of *in limine* motions at the future case management conference. Estimates of the scope and length of trial will not be changed even if settlement is achieved because expert evidence must be presented to address arguments by non-settling parties.

Dated: September 1, 2010

CARMEN A. TRUTANICH, City Attorney RICHARD M. BROWN, General Counsel JULIE C. RILEY, Deputy City. Attorney

JULIE C. RILEY Deputy City Attorney

Attorneys for Plaintiff CITY OF LOS ANGELES, acting by and through the LOS ANGELES DEPARTMENT OF WATER AND POWER

PROOF OF SERVICE

4	2 Lam amployed in the County of Law Appl
3	I am employed in the County of Los Angeles; I am over the age of eighteen years and am not a party to the within entitled action; my business address is 111 North Hope Street, Suite 340, Los Angeles, California 90012-2694. On September 1, 2010, I served the within document:
5	TO THE TOTAL PROPERTY OF THE P
7 8	practice of facsimile transmission of documents. It is transmitted to the
9	
10	(BY U.S. MAIL) by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail a Los Angeles, California addressed as set forth below.
11	
12	to the Santa Clara County Superior Court website: www.scefiling.org
13	regarding the Antelope Valley Groundwater matter.
14	I am readily familiar with the firm's practice of collection and
15	processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in
16	the ordinary course of business.
17	I declare under penalty of perjury under the laws of the State of California that the above is true and correct.
18	Executed on September 1, 2010, at Los Angeles, California.
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20	Pil. Oak
21	Julian Catena
22	* LILLIAN CATENA
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