

5 West Side Park 12

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Co., and White Fence Farms Mutual Water Co., Inc.,
[Six of the 16 Mutual Water Companies that Comprise
A. V. United Mutual Group]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF LOS ANGELES**

Coordination Proceeding
Special Title (Rule 1550(b))

) Judicial Council Coordination
) Proceeding No. 4408

**ANTELOPE VALLEY GROUNDWATER
CASES**

) Santa Clara Case No. 1-05-CV-049053
) Assigned to the Honorable Jack Komar
) Department 17C

Including 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

) **RESPONSES TO ANTELOPE VALLEY-
EAST KERN WATER AGENCY'S FIRST
SET OF SPECIAL INTERROGATORIES
PROPOUNDED TO CROSS-
DEFENDANTS / CROSS-
COMPLAINANTS, ELDORADO
MUTUAL WATER CO., LANDALE
MUTUAL WATER CO., SHADOW
ACRES MUTUAL WATER CO.,
SUNNYSIDE FARMS MUTUAL WATER
CO., WESTSIDE PARK MUTUAL
WATER CO., AND WHITE FENCE
FARMS MUTUAL WATER CO., INC.,
[SIX OF THE 16 MUTUAL WATER
COMPANIES THAT COMPRISE A. V.
UNITED MUTUAL GROUP]**

**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

AND RELATED ACTIONS.

) For Court's Use Only:
) Santa Clara County
) Case No. 1-05-CV-049053
) (For E-Posting/E-Service Purposes Only)

1 **PROPOUNDING PARTY:** Antelope Valley-East Kern Water Agency

2 **RESPONDING PARTIES:** Eldorado Mutual Water Co., Landale Mutual Water Co.,
3 Shadow Acres Mutual Water Co., Sunnyside Farms Mutual Water Co., Westside Park Mutual
4 Water Co., and White Fence Farms Mutual Water Co., Inc., [Six of the 16 Mutual Water
5 Companies that Comprise A. V. United Mutual Group]

6 **SET NO.:** ONE

7
8 **TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:**

9 Cross-Defendants / Cross-Complainants, Eldorado Mutual Water Co., Landale Mutual
10 Water Co., Shadow Acres Mutual Water Co., Sunnyside Farms Mutual Water Co., Westside
11 Park Mutual Water Co., and White Fence Farms Mutual Water Co., Inc. [which are six of the 16
12 mutual water companies that comprise A. V. UNITED MUTUAL GROUP], by and through their
13 attorneys of record, Gresham Savage Nolan & Tilden, PC, by Michael Duane Davis, Marlene L.
14 Allen-Hammarlund, and Derek R. Hoffman submit the following response to Antelope Valley-
15 East Kern Water Agency's First Set of Special Interrogatories, pursuant to the provisions of
16 *Code of Civil Procedure* section 2030.010, as follows:

17 It should be noted that these responding parties have not fully completed their
18 investigation of the facts relating to this case, and have not fully completed their discovery in this
19 action and have not completed their preparation for the trial. All of the answers contained herein
20 are based upon such information and documents which are presently available to and specifically
21 known to these responding parties and disclose only those contentions which presently occur to
22 such responding parties. It is anticipated that further discovery, independent investigation, legal
23 research and analysis will supply additional facts, add meaning to the known facts, as well as
24 establish entirely new factual conclusions and legal contentions, all of which may lead to
25 substantial additions to, changes in, and variations from the contentions herein set forth. The
26 following interrogatory responses are given without prejudice to responding parties' right to
27 produce evidence of any subsequently discovered fact or facts which these responding parties

1 may later recall. Responding parties accordingly reserve the right to change any and all answers
2 herein as additional facts are ascertained, analysis are made, legal research is completed and
3 contentions are made. The answers contained herein are made in a good faith effort to supply as
4 much factual information and as much specification of legal contentions as is presently known
5 but should in no way be to the prejudice of the responding party in relation to further discovery,
6 research or analysis.

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ANTELOPE VALLEY UNITED MUTUAL GROUP'S RESPONSES TO ANTELOPE VALLEY-EAST
KERN WATER AGENCY'S FIRST SET OF SPECIAL INTERROGATORIES

1
2 **WEST SIDE PARK MUTUAL WATER COMPANY**
3

4 **SPECIAL INTERROGATORY NO. 1:**

5 Do YOU contend that YOU have the right to recapture or use the return flows resulting
6 from State Water Project water AVEK imports into the area of adjudication?

7 **RESPONSE TO SPECIAL INTERROGATORY NO. 1:**

8 This responding party objects to this interrogatory in that it calls for a legal conclusion
9 and information that is protected by the attorney work product doctrine. This responding party
10 further objects to this interrogatory on the grounds that this responding party has not yet
11 completed discovery and has not yet completed preparation for trial. Without waiving its
12 objections, this responding party responds as follows: Yes, with regard to the State Water
13 Project water acquired and delivered pursuant to the agreements between this responding party,
14 AVEK and Palmdale Water District.
15

16 **SPECIAL INTERROGATORY NO. 2:**

17 Set forth all facts which support YOUR response to Special Interrogatory No. 1 above.

18 **RESPONSE TO SPECIAL INTERROGATORY NO. 2:**

19 This responding party objects to this interrogatory on the grounds that this responding
20 party has not yet completed discovery and has not yet completed preparation for trial. This
21 responding party further objects to this interrogatory on the grounds that it seeks information and
22 documents equally available to and in the possession of the propounding party. Without waiving
23 its objections, this responding party responds as follows: This responding party purchases State
24 Water Project water that it delivers to its members. In addition, this Mutual Water Company is
25 within the jurisdictional boundaries of the Palmdale Water District; however, due to delivery
26 difficulties, this Mutual Water Company has entered into a three way contract with AVEK and
27 Palmdale Water District, pursuant to which, Palmdale Water District has delivered quantities of

1 its annual State Water Project entitlement to AVEK, which has treated and delivered said water
2 to this Mutual Water Company, for which payment is made to AVEK, a portion of which
3 payment is returned to Palmdale Water District for the quantity of its State Water Project Water.
4 This Mutual Water Company is informed and believes that the cost assessed by AVEK and paid
5 by this Mutual Water Company includes a component charge for the construction, operation and
6 maintenance of AVEK's infrastructure, for Palmdale Water District's State Water Project
7 entitlements, and for AVEK's and Palmdale Water District's administrative and operational
8 costs, for capacity fees, and for AVEK's treatment and delivery of Palmdale Water District's
9 State Water Project water in the quantities reported.

10
11 **SPECIAL INTERROGATORY NO. 3:**

12 Describe in detail all WRITINGS which support YOUR response to Special Interrogatory
13 No. 1 above.

14 **RESPONSE TO SPECIAL INTERROGATORY NO. 3:**

15 This responding party objects to this interrogatory on the grounds that it is overbroad and
16 the documents requested are equally available to the propounding party, and, to the extent the
17 documents are not available, it would be unduly burdensome and oppressive for this responding
18 party to obtain the documents. This responding party further objects to this interrogatory on the
19 grounds that the documents have already been produced, have been posted to the Court's
20 website, or are protected by the attorney-client privilege, attorney work product doctrine, or the
21 right of privacy. This responding party further objects to this interrogatory on the grounds that
22 this responding party has not yet completed discovery and has not yet completed preparation for
23 trial.

24
25 **SPECIAL INTERROGATORY NO. 4:**

26 Do you contend that YOU have a right to return flows presently in the groundwater
27 which result from State Water Project water AVEK has imported into the area of adjudication?

1 **RESPONSE TO SPECIAL INTERROGATORY NO. 4:**

2 This responding party objects to this interrogatory in that it calls for a legal conclusion
3 and information that is protected by the attorney work product doctrine and the attorney-client
4 privilege. This responding party further objects to this interrogatory on the grounds that this
5 responding party has not yet completed discovery and has not yet completed preparation for trial.
6 Without waiving its objections, this responding party responds as follows: Yes.

7
8 **SPECIAL INTERROGATORY NO. 5:**

9 Set forth the amount of return flows presently in the groundwater as a result of State
10 Water Project water AVEK has imported to which you claim a right to recapture or use.

11 **RESPONSE TO SPECIAL INTERROGATORY NO. 5:**

12 This responding party objects to this interrogatory in that it calls for a legal conclusion,
13 expert opinion, and/or information that is protected by the attorney work product doctrine and
14 the attorney-client privilege. This responding party further objects to this interrogatory on the
15 grounds that this responding party has not yet completed discovery and has not yet completed
16 preparation for trial, and that the information sought is equally in the possession of or equally
17 available to the propounding party.

18
19 **SPECIAL INTERROGATORY NO. 6:**

20 Set forth all facts supporting your response to Special Interrogatory No. 5 above.

21 **RESPONSE TO SPECIAL INTERROGATORY NO. 6:**

22 This responding party objects to this interrogatory on the grounds that this responding
23 party has not yet completed discovery and has not yet completed preparation for trial. This
24 responding party further objects to this interrogatory on the grounds that it seeks information and
25 documents equally available to and in the possession of the propounding party. This responding
26 party objects to this interrogatory in that it calls for a legal conclusion, expert opinion, and/or

1 information that is protected by the attorney work product doctrine and the attorney-client
2 privilege.

3
4 **SPECIAL INTERROGATORY NO. 7:**

5 Describe in detail all WRITINGS supporting your response to Special Interrogatory No.
6 5 above.

7 **RESPONSE TO SPECIAL INTERROGATORY NO. 7:**

8 This responding party objects to this interrogatory on the grounds that it is overbroad and
9 the documents requested are equally available to the propounding party, and, to the extent the
10 documents are not available, it would be unduly burdensome and oppressive for this responding
11 party to obtain the documents. This responding party further objects to this interrogatory on the
12 grounds that the documents have already been produced, have been posted to the Court's
13 website, or are protected by the attorney-client privilege, attorney work product doctrine, or the
14 right of privacy. This responding party further objects to this interrogatory on the grounds that
15 this responding party has not yet completed discovery and has not yet completed preparation for
16 trial.

17
18 **SPECIAL INTERROGATORY NO. 8:**

19 Have YOU pumped return flows from State Water Project water AVEK has imported
20 into the area of adjudication?

21 **RESPONSE TO SPECIAL INTERROGATORY NO. 8:**

22 This responding party objects to this interrogatory in that it calls for a legal conclusion,
23 expert opinion, and/or information that is protected by the attorney work product doctrine and
24 the attorney-client privilege. This responding party further objects to this interrogatory on the
25 grounds that this responding party has not yet completed discovery and has not yet completed
26 preparation for trial. Without waiving its objections, this responding party responds as follows:
27 Yes.

1 **SPECIAL INTERROGATORY NO. 9:**

2 Set forth all facts supporting YOUR response to Special Interrogatory No. 8 above.

3 **RESPONSE TO SPECIAL INTERROGATORY NO. 9:**

4 This responding party objects to this interrogatory on the grounds that this responding
5 party has not yet completed discovery and has not yet completed preparation for trial. This
6 responding party further objects to this interrogatory on the grounds that it seeks information and
7 documents equally available to and in the possession of the propounding party.

8
9 **SPECIAL INTERROGATORY NO. 10:**

10 Describe in detail all WRITINGS supporting YOUR response to Special Interrogatory
11 No. 8 above.

12 **RESPONSE TO SPECIAL INTERROGATORY NO. 10:**

13 This responding party objects to this interrogatory on the grounds that it is overbroad and
14 the documents requested are equally available to the propounding party, and, to the extent the
15 documents are not available, it would be unduly burdensome and oppressive for this responding
16 party to obtain the documents. This responding party further objects to this interrogatory on the
17 grounds that the documents have already been produced, have been posted to the Court's
18 website, or are protected by the attorney-client privilege, attorney work product doctrine, or the
19 right of privacy. This responding party further objects to this interrogatory on the grounds that
20 this responding party has not yet completed discovery and has not yet completed preparation for
21 trial.

22
23 **SPECIAL INTERROGATORY NO. 11:**

24 Prior to January 18, 2006, did YOU participate in any communication with AVEK
25 regarding the right to use return flows from State Water Project water AVEK imports into the
26 area of adjudication?

1 **RESPONSE TO SPECIAL INTERROGATORY NO. 11:**

2 This responding party objects to this interrogatory on the grounds that this responding
3 party has not yet completed discovery and has not yet completed preparation for trial. This
4 responding party further objects to this interrogatory on the grounds that it seeks information and
5 documents equally available to and in the possession of the propounding party.
6

7 **SPECIAL INTERROGATORY NO. 12:**

8 Set forth all facts upon which YOUR response to Special Interrogatory No. 11 is based.

9 **RESPONSE TO SPECIAL INTERROGATORY NO. 12:**

10 This responding party objects to this interrogatory on the grounds that this responding
11 party has not yet completed discovery and has not yet completed preparation for trial. This
12 responding party further objects to this interrogatory on the grounds that it seeks information and
13 documents equally available to and in the possession of the propounding party. This responding
14 party further objects to this interrogatory on the grounds that it seeks information protected by
15 the attorney-client privilege and attorney work product privilege.
16

17 **SPECIAL INTERROGATORY NO. 13:**

18 Describe in detail all WRITINGS which support YOUR response to Special Interrogatory
19 No. 11.

20 **RESPONSE TO SPECIAL INTERROGATORY NO. 13:**

21 This responding party objects to this interrogatory on the grounds that it is overbroad and
22 the documents requested are equally available to the propounding party, and, to the extent the
23 documents are not available, it would be unduly burdensome and oppressive for this responding
24 party to obtain the documents. This responding party further objects to this interrogatory on the
25 grounds that the documents have already been produced, have been posted to the Court's
26 website, or are protected by the attorney-client privilege, attorney work product doctrine, or the
27

1 right of privacy. This responding party objects to this interrogatory on the grounds that this
2 responding party has not yet completed discovery and has not yet completed preparation for trial.
3

4 **SPECIAL INTERROGATORY NO. 14:**

5 Have YOU ever attempted to recapture or use return flows from State Water Project
6 water AVEK has imported into the area of adjudication?

7 **RESPONSE TO SPECIAL INTERROGATORY NO. 14:**

8 This responding party objects to this interrogatory in that it calls for a legal conclusion,
9 expert opinion, and/or information that is protected by the attorney work product doctrine and
10 the attorney-client privilege. This responding party further objects to this interrogatory on the
11 grounds that this responding party has not yet completed discovery and has not yet completed
12 preparation for trial. Without waiving its objections, this responding party responds as follows:
13 Yes.
14

15 **SPECIAL INTERROGATORY NO. 15:**

16 Set forth all facts supporting YOUR response to Special Interrogatory No. 14.

17 **RESPONSE TO SPECIAL INTERROGATORY NO. 15:**

18 This responding party objects to this interrogatory on the grounds that this responding
19 party has not yet completed discovery and has not yet completed preparation for trial. This
20 responding party further objects to this interrogatory on the grounds that it seeks information and
21 documents equally available to and in the possession of the propounding party. This responding
22 party further objects to this interrogatory on the grounds that it seeks information protected by
23 the attorney-client privilege and attorney work product privilege. Without waiving said
24 objections, this responding party has voluntarily purchased State Water Project water, in the
25 amounts reported, and produced the return flows from said State Water Project water.
26
27

1 **SPECIAL INTERROGATORY NO. 16:**

2 Describe in detail all WRITINGS which support YOUR response to Special Interrogatory
3 No. 14.

4 **RESPONSE TO SPECIAL INTERROGATORY NO. 16:**

5 This responding party objects to this Special Interrogatory on the grounds that it is
6 overbroad and the documents requested are equally available to the propounding party, and, to
7 the extent the documents are not available, it would be unduly burdensome and oppressive for
8 this responding party to obtain the documents. This responding party further objects to this
9 Special Interrogatory on the grounds that the documents have already been produced, have been
10 posted to the Court's website, or are protected by the attorney-client privilege, attorney work
11 product doctrine, or the right of privacy.

12
13 **SPECIAL INTERROGATORY NO. 17:**

14 If YOUR answer to Special Interrogatory No. 14 is anything other than "yes," explain in
15 detail the reason(s) why YOU have not attempted to recapture or use return flows resulting from
16 State Water Project water AVEK has imported into the area of adjudication.

17 **RESPONSE TO SPECIAL INTERROGATORY NO. 17:**

18 This responding party objects to this interrogatory in that it calls for a legal conclusion,
19 expert opinion, and/or information that is protected by the attorney work product doctrine and
20 the attorney-client privilege. This responding party further objects to this interrogatory on the
21 grounds that this responding party has not yet completed discovery and has not yet completed
22 preparation for trial.

23
24 **SPECIAL INTERROGATORY NO. 18:**

25 In any non-privileged WRITINGS YOU have prepared from 1974 to present (excluding
26 pleadings filed in this Action), have YOU stated that return flows from State Water Project
27 water AVEK imports into the area of adjudication is a source of water available to YOU?

1 **RESPONSE TO SPECIAL INTERROGATORY NO. 18:**

2 This responding party objects to this interrogatory on the grounds that it is overbroad and
3 the documents requested are equally available to the propounding party, and, to the extent the
4 documents are not available, it would be unduly burdensome and oppressive for this responding
5 party to obtain the documents. This responding party further objects to this interrogatory on the
6 grounds that the documents have already been produced, have been posted to the Court's
7 website, or are protected by the attorney-client privilege, attorney work product doctrine, or the
8 right of privacy. This responding party also objects to this interrogatory in that it calls for a legal
9 conclusion, expert opinion, and/or information that is protected by the attorney work product
10 doctrine and the attorney-client privilege.

11
12 **SPECIAL INTERROGATORY NO. 19:**

13 If YOUR answer to Special Interrogatory No. 18 is anything other than an unqualified
14 "no," then describe in detail the WRITINGS wherein YOU stated that return flows from State
15 Water Project water AVEK imports into the area of adjudication is a source of water available to
16 YOU.

17 **RESPONSE TO SPECIAL INTERROGATORY NO. 19:**

18 This responding party objects to this interrogatory on the grounds that it is overbroad and
19 the documents requested are equally available to the propounding party, and, to the extent the
20 documents are not available, it would be unduly burdensome and oppressive for this responding
21 party to obtain the documents. This responding party further objects to this interrogatory on the
22 grounds that the documents have already been produced, have been posted to the Court's
23 website, or are protected by the attorney-client privilege, attorney work product doctrine, or the
24 right of privacy.

1 **SPECIAL INTERROGATORY NO. 20:**

2 If YOUR answer to Special Interrogatory No. 18 is anything other than an unqualified
3 “yes,” then explain in detail why WRITINGS prepared by YOU have never stated that return
4 flows from State Project Water AVEK imports into the area of adjudication is a source of water
5 available to YOU.

6 **RESPONSE TO SPECIAL INTERROGATORY NO. 20::**

7 This responding party objects to this interrogatory on the grounds that it is overbroad and
8 the documents requested are equally available to the propounding party, and, to the extent the
9 documents are not available, it would be unduly burdensome and oppressive for this responding
10 party to obtain the documents. This responding party further objects to this interrogatory on the
11 grounds that the documents have already been produced, have been posted to the Court’s
12 website, or are protected by the attorney-client privilege, attorney work product doctrine, or the
13 right of privacy. This responding party further objects to this interrogatory in that it calls for a
14 legal conclusion and/or expert opinion.

15
16 **SPECIAL INTERROGATORY NO. 21:**

17 As to each admission request served concurrently herewith to which YOU do not provide
18 an unqualified admission, separately set forth all facts upon which YOUR denial of the
19 admission request is based.

20 **RESPONSE TO SPECIAL INTERROGATORY NO. 21:**

21 This responding party objects to this interrogatory on the grounds that it has not yet
22 completed its discovery and investigation of the facts in this matter; on the grounds that it seeks
23 information protected by the attorney-client privilege, the attorney work product doctrine, and
24 the right of privacy; and is overly broad, unduly burdensome and oppressive in that the
25 information, persons and documents that are responsive to this interrogatory are numerous and
26 are equally within the knowledge and availability of the propounding party. Without waiving
27 this objection, this responding party will produce the documents it has located that are in its

1 possession that are responsive to this interrogatory. The individuals with the most knowledge
2 regarding this information have been disclosed in the witness designations.

3
4 **SPECIAL INTERROGATORY NO. 22:**

5 As to each admission request served concurrently herewith to which YOU do not provide
6 an unqualified admission, identify in detail all WRITINGS which support YOUR denial of the
7 admission request.

8 **RESPONSE TO SPECIAL INTERROGATORY NO. 22:**

9 This responding party objects to this interrogatory on the grounds that it has not yet
10 completed its discovery and investigation of the facts in this matter; on the grounds that it seeks
11 information protected by the attorney-client privilege, the attorney work product doctrine, and
12 the right of privacy; and is overly broad, unduly burdensome and oppressive in that the
13 information, persons and documents that are responsive to this interrogatory are numerous and
14 are equally within the knowledge and availability of the propounding party. Without waiving
15 this objection, this responding party will produce the documents it has located that are in its
16 possession that are responsive to this interrogatory. The individuals with the most knowledge
17 regarding this information have been disclosed in the witness designations.

18
19 **SPECIAL INTERROGATORY NO. 23:**

20 Have YOU constructed or developed any wells, a purpose of which was to recapture
21 return flows from State Water Project water AVEK imports into the area of adjudication?

22 **RESPONSE TO SPECIAL INTERROGATORY NO. 23:**

23 This responding party objects to this interrogatory in that it calls for a legal conclusion,
24 expert opinion, and/or information that is protected by the attorney work product doctrine and
25 the attorney-client privilege. This responding party further objects to this interrogatory on the
26 grounds that this responding party has not yet completed discovery and has not yet completed
27 preparation for trial. This responding party objects to this interrogatory in that it calls for a legal

1 conclusion, expert opinion, and/or information that is protected by the attorney work product
2 doctrine and the attorney-client privilege.

3
4 **SPECIAL INTERROGATORY NO. 24:**

5 Set forth all facts supporting YOUR response to Special Interrogatory No. 23.

6 **RESPONSE TO SPECIAL INTERROGATORY NO. 24:**

7 This responding party objects to this interrogatory in that it calls for a legal conclusion,
8 expert opinion, and/or information that is protected by the attorney work product doctrine and
9 the attorney-client privilege. This responding party further objects to this interrogatory on the
10 grounds that this responding party has not yet completed discovery and has not yet completed
11 preparation for trial.

12
13 **SPECIAL INTERROGATORY NO. 25:**

14 Describe in detail all WRITINGS which support your response to Special Interrogatory
15 No. 23.

16 **RESPONSE TO SPECIAL INTERROGATORY NO. 25:**

17 This responding party objects to this interrogatory in that it calls for a legal conclusion,
18 expert opinion, and/or information that is protected by the attorney work product doctrine and
19 the attorney-client privilege. This responding party further objects to this interrogatory on the
20 grounds that this responding party has not yet completed discovery and has not yet completed
21 preparation for trial.

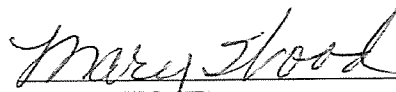
1 **Verification by Authorized Individual:**

2 **Declaration under Penalty of Perjury:**

3 I, Mary Wood, am the Board Member of the West Side Park Mutual Water Company and
4 have personal knowledge of the facts set forth above.

5 If called to do so, I could and would competently testify to these facts under oath. I
6 declare under penalty of perjury under the laws of the State of California that the foregoing is
7 true and correct.

8 Executed this 5th day of December, 2013 at Palmdale, CA.

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10 
11 MARY WOOD
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1 SIGNED BY ATTORNEY AS TO OBJECTIONS ONLY.

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3 DATED: December 5, 2013

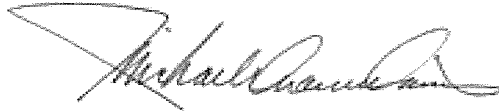
Respectfully submitted,

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GRESHAM SAVAGE NOELAN & TIDEN, PC

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By: _____

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MICHAEL DUANE DAVIS, ESQ.

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MARLENE L. ALLEN-HAMMARLUND, ESQ.

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DEREK R. HOFFMAN, EQ.

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Attorneys for CROSS-DEFENDANT / CROSS-
COMPLAINANT, A. V. UNITED MUTUAL GROUP
and Cross-Defendants, ADAMS BENNETT
INVESTMENTS, LLC; MIRACLE IMPROVEMENT
CORPORATION dba GOLDEN SANDS MOBILE
HOME PARK, aka GOLDEN SANDS TRAILER
PARK, named as ROE 1121; ST. ANDREW'S
ABBAY, INC., named as ROE 623; SERVICE ROCK
PRODUCTS, L.P.; and SHEEP CREEK WATER
COMPANY, INC.

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF SAN BERNARDINO

Re: *ANTELOPE VALLEY GROUNDWATER CASES*
Los Angeles County Superior Court Judicial Council Coordinated
Proceedings No. 4408; Santa Clara County Superior Court Case No. 1-05-CV-049053

I am employed in the County of San Bernardino, State of California. I am over the age of 18 years and not a party to the within action; my business address is: 550 East Hospitality Lane, Suite 300, San Bernardino, CA 92408-4205.

On December 6, 2013, I served the foregoing document(s) described as **RESPONSES TO ANTELOPE VALLEY-EAST KERN WATER AGENCY'S FIRST SET OF SPECIAL INTERROGATORIES PROPOUNDED TO CROSS-DEFENDANTS / CROSS-COMPLAINANTS, ELDORADO MUTUAL WATER CO., LANDALE MUTUAL WATER CO., SHADOW ACRES MUTUAL WATER CO., SUNNYSIDE FARMS MUTUAL WATER CO., WESTSIDE PARK MUTUAL WATER CO., AND WHITE FENCE FARMS MUTUAL WATER CO., INC., [SIX OF THE 16 MUTUAL WATER COMPANIES THAT COMPRISE A. V. UNITED MUTUAL GROUP]** on the interested parties in this action in the following manner:

(X) **BY ELECTRONIC SERVICE** – I posted the document(s) listed above to the Santa Clara County Superior Court website, <http://www.scefiling.org>, in the action of the Antelope Valley Groundwater Cases,

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, 2013, at San Bernardino, California.



DINA M. SNIDER