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Attorneys for Cross-Defendant, ADAMS
BENNETT INVESTMENTS, LLC; Cross-
Defendants and Cross-Complainants, ANTELOPE
VALLEY UNITED MUTUALS GROUP
[comprised of Antelope Park Mutual Water Co.,
Aqua-J Mutual Water Co., Averydale Mutual Water
Co., Baxter Mutual Water Co., Bleich Flat Mutual
Water Co., Colorado Mutual Water Co., Eldorado
Mutual Water Co., Evergreen Mutual Water Co.,
Land Projects Mutual Water Co., Landale Mutual
Water Co., Shadow Acres Mutual Water Co.,
Sundale Mutual Water Co., Sunnyside Farms
Mutual Water Co., Tierra Bonita Mutual Water Co.,
Westside Park Mutual Water Co. and White Fence
Farms Mutual Water Co.]; and Cross-Defendants,
MIRACLE IMPROVEMENT CORPORATION
DBA GOLDEN SANDS MOBILE HOME PARK,
AKA GOLDEN SANDS TRAILER PARK,
NAMED AS ROE 1121; SAINT ANDREW'S
ABBAY, INC., NAMED AS ROE 623; SERVICE
ROCK PRODUCTS, L.P.; and SHEEP CREEK
WATER COMPANY

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

Coordination Proceeding
Special Title (Rule 1550(b))

**ANTELOPE VALLEY GROUNDWATER
CASES**

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

CAPTION CONTINUED ON NEXT PAGE

Judicial Council Coordination
Proceeding No. 4408

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

**DECLARATION OF CROSS-
DEFENDANT, SAINT ANDREW'S
ABBAY, INC., NAMED AS ROE 623 IN
SUPPORT OF PROVE-UP TRIAL**

1	Los Angeles County Waterworks District No. 40 v. Diamond Farming Co.)	PROVE-UP
2	Superior Court of California, County of Kern,)	Trial Date: September 28, 2015
3	Case No. S-1500-CV-254-348)	Time: 10:00 A.M.
4	Wm. Bolthouse Farms, Inc. v. City of Lancaster)	Dept.: Dept. 1, Los Angeles
5	Diamond Farming Co. v. City of Lancaster)	Judge: Hon. Jack Komar
6	Diamond Farming Co. v. Palmdale Water Dist.)	
7	Superior Court of California, County of)	
8	Riverside, consolidated actions, Case Nos.)	
9	RIC 353 840, RIC 344 436, RIC 344 668)	
10	AND RELATED ACTIONS.)	

11 1. This declaration is made in support of the [Proposed] Judgment and Physical
12 Solution filed with the court on March 4, 2015 on behalf of Cross-Defendant **SAINT**
13 **ANDREW'S ABBEY, INC., NAMED AS ROE 623** ("Declarant").

14 2. The signatory to this Declaration has personal knowledge of each fact herein and
15 would testify competently thereto under oath. The signatory to this Declaration is Declarant's
16 Consulting Licensed Professional Engineer.

17 3. Declarant is an active California corporation, with an entity address of Post Office
18 Box 40, Valyermo, CA 93563. It was formed on December 9, 1959. **[From Declarant's**
19 **Responses to December 12, 2012 Discovery Order for Phase 4 Trial, Responses I.1.a., I.1.b.**
20 **and I.3.c.; and supporting documents at Attachments I.1.a., I.3.a.i. and I.3.c.i. thereto].**

21 4. Declarant is the record owner of the following parcels of real property, most of
22 which overlie the Antelope Valley Area of Adjudication, which real property is located in Los
23 Angeles County and is identified by Assessor's Parcel Numbers APN 3060-008-017, 3060-009-
24 014, 3060-014-006, 3060-016-001, 3060-016-002, 3060-016-012, 3060-018-011, 3060-018-033,
25 3061-003-004, 3061-004-008, 3061-004-009, 3061-005-015, 3061-005-016, 3061-006-004, 3061-
26 006-019, 3061-012-007, 3061-023-002, 3061-023-005, 3061-023-011, 3061-024-001, 3061-024-002,
27 3061-024-004, 3061-025-003, 3061-025-004, 3061-025-005, 3061-025-007, 3061-025-010, 3061-
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025-011 and 3061-025-017. **[From Declarant's Responses to December 12, 2012 Discovery Order for Phase 4 Trial, Responses I.1.a., I.3.b. and I.3.c.; and supporting documents at Attachment I.1.a., I.3.b.i. and I.3.c.i. thereto].**

5. Based on Los Angeles County Assessor's Map information, Declarant's service area is comprised of approximately eighteen hundred seventy-eight point four (1878.4) acres; specifically APN 3060-008-017 [274.77 acres], 3060-009-014 [65.76 acres], 3060-014-006 [85.04 acres], 3060-016-001 [3.19 acres], 3060-016-002 [76.96 acres], 3060-016-012 [40.09 acres], 3060-018-011 [20.12 acres], 3060-018-033 [60.51 acres], 3061-003-004 [79.1 acres], 3061-004-008 [60.98 acres], 3061-004-009 [14.77 acres], 3061-005-015 [27.3 acres], 3061-005-016 [41.06 acres], 3061-006-004 [41.38 acres], 3061-006-019 [39.18 acres], 3061-012-007 [10.57 acres], 3061-023-002 [56.63 acres], 3061-023-005 [20.33 acres], 3061-023-011 [155.46 acres], 3061-024-001 [20.92 acres], 3061-024-002 [112.05 acres], 3061-024-004 [187.06 acres], 3061-025-003 [20.03 acres], 3061-025-004 [40.04 acres], 3061-025-005 [59.91 acres], 3061-025-007 [25 acres], 3061-025-010 [80.17 acres], 3061-025-011 [80.17 acres] and 3061-025-017 [79.83 acres]. **[From Declarant's Responses to December 12, 2012 Discovery Order for Phase 4 Trial, Responses I.1.a., I.3.b. and I.3.c.; and supporting documents at Attachment I.1.a., I.3.b.i. and I.3.c.i. thereto].**

6. Declarant claims the right to produce and use groundwater for the provision of a domestic water supply to the Benedictine monks and to the guests and visitors of the Abbey; to irrigate the apple orchards, pastures, landscaping and minimal garden vegetables grown occasionally to support the Abbey; to provide a domestic water supply to the caretaker residences located at each well; to irrigate trees planted at the Nickel's Ranch Well and landscaping located at the Caretaker's Cabin. **[From Declarant's Responses to December 12, 2012 Discovery Order for Phase 4 Trial, Responses I.1., I.1.f., I.1.g., I.1.h., I.1.i., I.2. and I.3.; and supporting documents at Attachments I.1., I.3.a.i. and I.3.b.i. thereto].**

7. The maximum amount of groundwater produced from the Property, measured in acre feet, for the following calendar years is as follows:

a. 2000: 162

- 1 b. 2001: 244
2 c. 2002: 235
3 d. 2003: 209
4 e. 2004: 163
5 f. 2011: 149
6 g. 2012: 201

7 **[From Declarant's Responses to December 12, 2012 Discovery Order for Phase 4 Trial,**
8 **Responses I.1.e., I.3.a. and I.3.b.; and supporting documents at Attachments I.3.a.i. and**
9 **I.3.b.i. thereto; Declarant's First Supplemental Response to December 12, 2012 Discovery**
10 **Order for Phase 4 Trial, Responses I.1.l. and I.3.a.; and supporting documents at**
11 **Attachment I.3.a.i. thereto; Master Stipulation Regarding Pumping During Calendar Years**
12 **2011 and 2012 [for Phase 4 Trial]; and Exhibit 4 to [Proposed] Judgment and Physical**
13 **Solution].**

14 8. The use(s) to which the groundwater produced from the Property for the calendar
15 years listed in Paragraph 7 was for the provision of domestic water service to the Benedictine
16 monks, to the guests and visitors of the Abbey and to the Caretaker(s), and for the irrigation of
17 apple orchards, trees, pastures, landscaping and minimal garden vegetables. **[From Declarant's**
18 **Responses to December 12, 2012 Discovery Order for Phase 4 Trial, Responses I.1., I.1.f.,**
19 **I.1.g., I.1.h., I.1.i. I.2. and I.3.; and supporting documents at Attachments I.3.a.i. and I.3.b.i.**
20 **thereto].**

21 9. The manner and method for determining the amount of groundwater produced
22 from the Property included: expert opinion, pump tests and SCE electric power records. **[From**
23 **Declarant's Responses to December 12, 2012 Discovery Order for Phase 4 Trial, Responses**
24 **I.1.c., I.1.i., I.1.l. and I.3.; and supporting documents at Attachments I.3.a.i. and I.3.c.i.**
25 **thereto; Declarant's First Supplemental Response to December 12, 2012 Discovery Order**
26 **for Phase 4 Trial, Responses I.1.l. and I.3.a.; and supporting documents at Attachment**
27 **I.3.a.i. thereto].**

1 10. All the information contained in the evidence introduced at the Phase 4 Trial is
2 expressly incorporated herein and made a part of this Declaration for the benefit of the Declarant,
3 as if stated verbatim as follows:

4 a. Declarant's Responses to December 12, 2012 Discovery Order for Phase 4
5 Trial, dated December 21, 2012, which was marked for identification and admitted into evidence
6 as 4-STANDREWS-1.

7 b. Declarant's First Supplemental Responses to December 12, 2012
8 Discovery Order for Phase 4 Trial, dated January 15, 2013, which was marked for identification
9 and admitted into evidence as 4-STANDREWS-2.

10 The undersigned declare under penalty of perjury under the laws of the State of
11 California that the foregoing is true and correct.

12 Executed this 22 of April, 2015, at Riverside, California.

13
14 By: Robert Krieger
15 ROBERT KRIEGER, P.E.
16 ITS: Consulting Licensed Professional Engineer
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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 Sept. 16, 2015, I served the foregoing document(s) described as **DECLARATION OF CROSS-DEFENDANT, SAINT ANDREW'S ABBEY, INC., NAMED AS ROE 623 IN SUPPORT OF PROVE-UP TRIAL** 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 Sept. 16, 2015, at San Bernardino, California.


DINA M. SNIDER