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 Los Angeles City Attorney
 RICHARD M. BROWN, General Counsel, Water and Power
 7 RAYMOND ILGUNAS, General Counsel, Los Angeles World Airports
 Attorneys for Defendant CITY OF LOS ANGELES and
 8 LOS ANGELES WORLD AIRPORTS
 9 Attorneys for Cross-Defendants City of Los
 Angeles and Los Angeles World Airports

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
 11 **COUNTY OF LOS ANGELES**
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13 Coordination Proceeding
 14 ANTELOPE VALLEY GROUNDWATER
 15 CASES,
 16 Los Angeles County Waterworks District No.
40 v. Diamond Farming Co.
 17 Los Angeles County Waterworks District No.
 18 40 v. Diamond Farming Co.
 19 Wm Bolthouse Farms, Inc. v. City of
 Lancaster
 20 Diamond Farming Co. v. City of Lancaster
 21 Diamond Farming Co. v. Palmdale Water
 22 District,

Judicial Council Coordination
 Proceeding No. 4408

**OPPOSITION TO PROPOSED ORDER
 AFTER JUNE 30, 2016 HEARING
 REGARDING WATERMASTER
 FORMATION AND PROPOSED
 REVISED ORDER**

Date: June 30, 2016
 Time: 10:00 a.m.
 Dept.: 222

The Hon. Jack Komar, Dept. 17
 Santa Clara Case No. 105 CV 049053

Riverside County Superior Court
 Lead Case No. RIC 344436
 Case No. RIC 344668
 Case No. RIC 353840

Los Angeles Superior Court Case
 No. BC 325201

Kern County Superior Court Case
 No. S-1500-CV-254348

23 AND RELATED ACTIONS
 24
 25

26 Cross-Defendants, the City of Los Angeles, by and through its Department of Airports,
 27 Los Angeles World Airports (LAWA), the County Sanitation Districts of Los Angeles County
 28 Nos. 14 and 20 (LA County Sanitation), the Antelope Valley - East Kern Water Agency (AVEK),

1 Bolthouse Properties, LLC, Wm. Bolthouse Farms, Inc., Crystal Organic farms LLC, Diamond
2 Farming Company, Granite Construction Company, Grimmway Enterprises, Inc., the Antelope
3 Valley Ground Water Agreement Association (AGWA), Lapis Land company, LLC, Tejon
4 Ranchcorp, Craig Van Dam, Delmar D. Van Dam, Gary Van Dam, Gertrude J. Van Dam
5 (collectively, “Overliers”) submit this opposition to the [Proposed] Order After June 30, 2016
6 Hearing Regarding Watermaster Formation filed by the ANTELOPE VALLEY UNITED
7 MUTUALS GROUP, ADAMS BENNETT INVESTMENTS, LLC and SERVICE ROCK
8 PRODUCTS, LP (collectively the “Mutuals”).

9 The Judgment and Physical Solution approved by the Court (Exhibit A to the December
10 23, 2016 Judgment) mandates that the Watermaster Board and Watermaster Engineer develop
11 comprehensive rules and procedures to implement the Judgment. Instead of allowing the
12 Watermaster Board and Watermaster Engineer to fulfill this role, the Mutuals’ [Proposed] Order
13 would require that the comprehensive Watermaster rules and procedures be developed through
14 Court proceedings. The apparent intent of the Mutuals is to eviscerate the powers of the
15 Watermaster, because the Mutuals do not have their own member on the Watermaster Board.

16 The [Proposed] Order submitted by the Mutuals incorporated some, but not all, of the
17 proposed revisions provided by the Overliers during the meet and confer on the [Proposed] Order.
18 A revised [Proposed] Order is provided in redline-strikeout format as Exhibit A which addresses
19 areas of remaining disagreement between the Mutuals and the Overliers following a meet and
20 confer process, and in clean format as Exhibit B.

21 The proposed revisions to the Order include:

- 22 • Striking the language in finding and determination 1 that the “composition of the
23 Watermaster Board” is “subject to the Court’s final approval,” because the Court
24 has already approved the composition pursuant to Section 18.1.1 of Exhibit A to
25 the December 23, 2015 Judgment.
- 26 • Revising the language in finding and determination 4 that the Mutuals’ objections
27 to elements of the procedures were “sustained,” because rather than sustaining
28 objections, the Court requested these issues be further considered in

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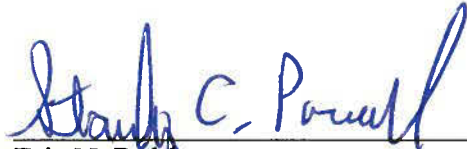
comprehensive election rules and procedures to be prepared for the Court's consideration.

- Deleting language in the [Proposed] Order that indicates the Court's approval of the interim Watermaster was provisional, or that the interim Watermaster is subject to further approval by the Court. The Court has already approved the interim Watermaster, and authorized it to proceed with the limited task of developing and publishing a "Request for Proposals" ("RFP") for the Watermaster Engineer.
- Replacing the broad term "comprehensive Watermaster organizational rules and procedures" with more narrow language that reflects the scope of the comprehensive election rules and procedures requested by the Court. The language already used in finding and determination 1 of the [Proposed] Order, "all rules and procedures used to elect or appoint representatives to the Watermaster Board, including any Alternates and the DoD Liaison," better reflects the scope of the documentation requested by the Court.

For these reasons, the Overliers request that the Court use the revised [Proposed] Order.

Dated: July 20, 2016

KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD
A Professional Corporation

By: 
 Eric N. Robinson
 Stanley C. Powell
 Attorneys for Defendant CITY OF LOS ANGELES and
 LOS ANGELES WORLD AIRPORTS

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Dated: July 19, 2016

ELLISON, SCHNEIDER & HARRIS, LLP

By: Christopher M. Sanders
Christopher M. Sanders
Attorneys for COUNTY SANITATION
DISTRICTS OF LOS ANGELES COUNTY NOS.
14 AND 20

Dated: July __, 2016

BRUNICK, McELHANEY & KENNEDY PLC

By: _____
William J. Brunick
Lee McElhaney
Attorneys for ANTELOPE VALLEY-EAST
KERN WATER AGENCY

Dated: July __, 2016

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Attorneys for BOLTHOUSE PROPERTIES,
LLC and WM. BOLTHOUSE FARMS, INC.

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KUHS & PARKER

By: _____
Robert Kuhs
Attorneys for TEJON RANCHCORP, TEJON
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CONSTRUCTION COMPANY

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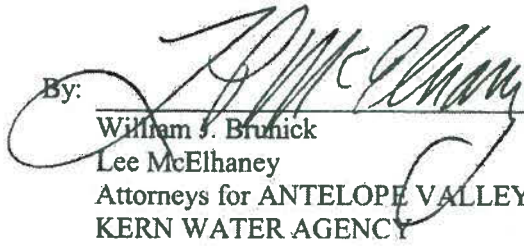
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Dated: July 20, 2016

LeBEAU-THELEN

By: 

Bob Joyce
Attorneys for DIAMOND FARMING,
GRIMMWAY ENTERPRISES, INC.,
CRYSTAL ORGANIC FARMS and LAPIS LAND
CO.

Dated: July __, 2016

LAW OFFICES OF YOUNG WOOLDRIDGE LLP

By: _____
Scott Kuney
Attorneys for CRAIG VAN DAM, DELMAR
D. VAN DAM, GARY VAN DAM and
GERTRUDE J. VAN DAM

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GERTRUDE J. VAN DAM

Dated: July 20, 2016

BROWNSTEIN HYATT FARBER SCHRECK, LLP

By: Starling C. Powell
For Michael T. Fife
Attorneys for ANTELOPE VALLEY GROUND
WATER AGREEMENT ASSOCIATION

EXHIBIT A

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SUPERIOR COURT OF CALIFORNIA
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

Included 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

**REVISED [PROPOSED]
ORDER AFTER JUNE 30, 2016
HEARING REGARDING
WATERMASTER FORMATION**

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

DATE: June 30, 2016
TIME: 10:00 A.M.
PLACE: 111 N. Hill Street
Los Angeles, CA
DEPT.: 222

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.

A hearing was held on June 30, 2016, at the hour of 10:00 a.m. in Department 222 of the
above-entitled Court, the Honorable Jack Komar, Judge, presiding.

1474169.1 1351-007

Antelope Valley Groundwater Litigation (Consolidated Cases) (JCCP 4408)
Superior Court of California, County of Los Angeles, Lead Case No. BC 325 201

Page 1

[PROPOSED] ORDER AFTER JUNE 30, 2016 HEARING REGARDING WATERMASTER FORMATION

A785-000 -- 2468150.1
A785-000 -- 2513780.1

1 The purpose of the hearing was to report on the procedures that were used and the results
2 of the election for the two landowner Watermaster Seats and the Public Water Suppliers’
3 Watermaster Seat; to receive and hear objections and challenges to the conduct, procedures
4 and/or results of the election for the two landowner Watermaster Seats and the “elected” Public
5 Water Suppliers’ Watermaster Seat; and to report on the status of the selection of representatives
6 for the two Watermaster Seats that are permanently held by Los Angeles County Waterworks
7 District No. 40 and Antelope Valley East Kern Water Agency (“AVEK”), all under Section
8 18.1.1. of the Judgment. Appearances are as reflected in the Court’s Minute Order for this
9 hearing. No court reporter was present.

10 Prior to the hearing, Cross-Defendants / Cross-Complainants, Antelope Valley United
11 Mutuals Group [comprised of Antelope Park Mutual Water Co., Aqua-J Mutual Water Co.,
12 Averydale Mutual Water Co., Baxter Mutual Water Co., Bleich Flat Mutual Water Co., Colorado
13 Mutual Water Co., El Dorado Mutual Water Co., Evergreen Mutual Water Co., Land Projects
14 Mutual Water Co., Landale Mutual Water Co., Shadow Acres Mutual Water Co., Sundale
15 Mutual Water Co., Sunnyside Farms Mutual Water Co., Tierra Bonita Mutual Water Co., West
16 Side Park Mutual Water Co., and White Fence Farms Mutual Water Co., Inc.]; and Cross-
17 Defendants, Adams Bennett Investments, LLC and Service Rock Products, L.P. (collectively,
18 “Challenging Parties”) had filed objections and challenges (“Objections”) to the “*Rules and*
19 *Procedures of Election of Initial Landowner Party Watermaster Representatives*” (“Landowner
20 *Procedures*”) that were used in the election of the representatives for the two landowner
21 Watermaster Seats, which were posted to the Court’s website. Cross-Defendants, the City of Los
22 Angeles, by and through its Department of Airports, Los Angeles World Airports (LAWA), the
23 County Sanitation Districts of Los Angeles County Nos. 14 and 20 (LA County Sanitation),
24 AVEK, Bolthouse Properties, LLC, Wm. Bolthouse Farms, Inc., Crystal Organic farms LLC,
25 Diamond Farming Company, Granite Construction Company, Grimmway Enterprises, Inc., the
26 Antelope Valley Ground Water Agreement Association (AGWA), Lapis Land company, LLC,
27 Tejon Ranchcorp, Craig Van Dam, Delmar D. Van Dam, Gary Van Dam, Gertrude J. Van Dam
28

1 (collectively “Responding Parties”), filed a joint opposition (“Opposition”) to the Objections.
2 The Challenging Parties filed a response (“Response”) to the Opposition. No other moving or
3 opposing papers were filed in advance of the hearing.

4 On the evening of June 29, 2016, counsel for the United States Department of Defense,
5 acting in the capacity of “Inspector of Elections” pursuant to the Landowner Procedures, posted
6 to the Court website, a “*Notice of Results of Election of Landowner Parties’ Representatives to*
7 *the Watermaster Board,*” which memorialized the results of the tally of the associated ballots as
8 follows: Dennis J. Atkinson – 39,721 votes; John A. Calandri – 31,406 votes; Derek Yurosek –
9 13,744 votes; and Randall Scott – 5,031 votes.

10 In the Objections and at the hearing, counsel for the Challenging Parties did not object to
11 the results of the election of the representatives for the two landowner Watermaster Seats. The
12 Challenging Parties did, however, object that certain provisions of the Landowner Procedures
13 were neither authorized by nor consistent with the Stipulation for Entry of Judgment and the
14 Judgment, and did not satisfy the Court’s mandate in the Statement of Decision that the rules and
15 procedures be fair, equitable, necessary and equally applied to all overlying landowners. The
16 Challenging Parties specifically objected to provisions in the Landowner Procedures: (1) that
17 authorized the voting parties to cast the entirety of their votes for each of the two landowner
18 Watermaster Seats; (2) that allowed the Public Overliers on Exhibit 4 to cast votes in the election
19 of the landowner Watermaster Seats; (3) that elected a single “Landowner Alternate,” as the
20 third-highest vote-getter; (4) that provided for initial two and four year terms and the subsequent
21 staggering of terms for the landowner Watermaster Seats; and (5) that fail to expressly require
22 that the Landowner Procedures and any other Watermaster formation rules and procedures must
23 be approved by the Court and cannot be unilaterally imposed by any party or group of parties.

24 At the hearing, reports were given that the following individuals had been selected to fill
25 the respective Watermaster Seats:
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1 1. Attorney Jeffrey Dunn, counsel for Los Angeles County Waterworks District No.
2 40 (“District 40”) reported that District 40 had selected Adam Ariki to the District 40
3 Watermaster Seat.

4 2. Attorney Keith Lemieux, counsel for Littlerock Creek Irrigation District, reported
5 that the Public Water Suppliers had elected Leo Thibault to the “Elected” Public Water Supplier
6 Watermaster Seat.

7 3. Attorney Leland McElhane, counsel for AVEK, reported that AVEK had
8 selected Robert Parris to the AVEK Seat.

9 4. Attorney Thomas Bunn, counsel for Palmdale Water District, reported that Cathy
10 Mac Laren had been selected as an alternate to the “elected” Public Water Supplier Seat, to
11 which no objections were raised either prior to or at the hearing.

12 5. U.S. Attorney James DuBois, counsel for the United States Department of Justice,
13 reported that Gerald Boetsch had been selected as the United States Department of Defense
14 Liaison representative to the Watermaster Board (“DoD Liaison”), to which no objections were
15 raised ~~either prior to or~~ at the hearing.

16 Having considered the Objections, Opposition, Response and other relevant papers filed,
17 and the arguments and reports of counsel,

18 **The Court makes the following findings and determinations:**

- 19 1. The ~~composition of the Watermaster Board, the~~ party representatives who will
20 serve on the Watermaster Board, and all rules and procedures used to elect or
21 appoint representatives to the Watermaster Board, including any Alternates and
22 the DoD Liaison, are subject to the Court’s final approval.
- 23 2. The Inspector of Elections conducted the election of the landowner Watermaster
24 Seats fairly, openly and in accordance with the Landowner Procedures, and
25 afforded sufficient notice and due process to all parties who wished to participate.
- 26 3. The Challenging Parties’ objections to those Landowner Procedures: (1) that
27 authorized the voting parties to cast the entirety of their votes for each of the two
28

landowner Watermaster Seats; and (2) that allowed the Public Overliers on Exhibit 4 to cast votes in the election of the landowner Watermaster Seats are **overruled**.

4. The Challenging Parties ~~concerns with objections to~~ the Landowner Procedures: (3) that called for the election of a single “Landowner Alternate,” as the third-highest vote-getter; (4) that provided for initial two and four year terms and the subsequent staggering of terms for the landowner Watermaster Seats; and (5) that fail to expressly require that the Landowner Procedures and any other Watermaster formation rules and procedures must be approved by the Court and cannot be unilaterally imposed by any party or group of parties are subject to further meet and confer between the parties ~~sustained~~.

5. The Court ~~provisionally~~ approves an *interim* Watermaster Board (“*Interim Watermaster*”) composed as follows:

- a. District 40 Seat – Adam Arika
- b. “Elected” Public Water Supplier Seat – Leo Thibault
- c. AVEK Seat – Robert Parris
- d. Landowner Seat – Dennis Atkinson
- e. Landowner Seat – John Calandri

~~6. The *Interim Watermaster* is subject to the Court’s final approval.~~

~~7.6.~~ The *Interim Watermaster* is further subject to the Court’s approval of all rules and procedures used to elect or appoint representatives to the Watermaster Board, including any Alternates and the DoD Liaison (“Watermaster Election Rules and Procedures”) comprehensive Watermaster organizational rules and procedures (“Watermaster Organizational Rules”) to be prepared by the parties and submitted to the Court for final approval in accordance with this Order.

~~8.7.~~ The *interim Watermaster* is hereby authorized to develop and publish a “Request for Proposals” (“RFP”) for the position of Watermaster Engineer. ~~Further action~~

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1 ~~regarding the selection of the Watermaster Engineer will require the prior~~
2 ~~approval of the Court.~~

3 9-8. The Court expresses its sincere appreciation to U.S. Attorney James DuBois for
4 his services as the Inspector of Elections and hereby relieves Mr. DuBois from
5 that service.

6 **IT IS HEREBY ORDERED** that all parties seeking or appointing representatives on the
7 Watermaster Board, including Los Angeles Waterworks District No. 40, the Public Water
8 Suppliers, AVEK and the Overliers listed on Exhibit 4 to the Judgment, shall meet and confer
9 and develop proposed Watermaster ~~Election Rules and Procedures~~Organizational Rules
10 consistent with this Order. The parties shall submit the proposed Watermaster Election Rules
11 ~~and Procedures~~Organizational Rules to the Court prior to September 6, 2016. On September 6,
12 2016, at 10:00 am in Los Angeles, at a department to be determined, a hearing shall be held to
13 review and consider the proposed Watermaster ~~Election Rules and Procedures~~Organizational
14 ~~Rules~~, to hear any objections to the proposed Watermaster Election Rules and
15 ~~Procedures~~Organizational Rules, and to consider final approval of the proposed Watermaster
16 Election Rules and ProceduresOrganizational Rules and the Watermaster Board.

17 **IT IS FURTHER ORDERED** that a detailed statement of the proposed Watermaster
18 Board member's background, education, job history and other qualifying attributes shall be
19 posted on the Court's website prior to the September 6, 2016 hearing, for each *interim*
20 Watermaster Board member, for the provisionally approved "Elected" Public Water Supplier
21 Watermaster Seat Alternate representative, for the DoD Liaison representative, and for any
22 proposed Landowner Alternate representative, for the Court's approval.

23
24 DATED: _____

HON. JACK KOMAR
JUDGE OF THE SUPERIOR COURT

EXHIBIT B

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22 Watermaster Seats, which were posted to the Court’s website. Cross-Defendants, the City of Los
23 Angeles, by and through its Department of Airports, Los Angeles World Airports (LAWA), the
24 County Sanitation Districts of Los Angeles County Nos. 14 and 20 (LA County Sanitation),
25 AVEK, Bolthouse Properties, LLC, Wm. Bolthouse Farms, Inc., Crystal Organic farms LLC,
26 Diamond Farming Company, Granite Construction Company, Grimmway Enterprises, Inc., the
27 Antelope Valley Ground Water Agreement Association (AGWA), Lapis Land company, LLC,
28 Tejon Ranchcorp, Craig Van Dam, Delmar D. Van Dam, Gary Van Dam, Gertrude J. Van Dam

1 (collectively “Responding Parties”), filed a joint opposition (“Opposition”) to the Objections.
2 The Challenging Parties filed a response (“Response”) to the Opposition. No other moving or
3 opposing papers were filed in advance of the hearing.

4 On the evening of June 29, 2016, counsel for the United States Department of Defense,
5 acting in the capacity of “Inspector of Elections” pursuant to the Landowner Procedures, posted
6 to the Court website, a “*Notice of Results of Election of Landowner Parties’ Representatives to*
7 *the Watermaster Board,*” which memorialized the results of the tally of the associated ballots as
8 follows: Dennis J. Atkinson – 39,721 votes; John A. Calandri – 31,406 votes; Derek Yurosek –
9 13,744 votes; and Randall Scott – 5,031 votes.

10 In the Objections and at the hearing, counsel for the Challenging Parties did not object to
11 the results of the election of the representatives for the two landowner Watermaster Seats. The
12 Challenging Parties did, however, object that certain provisions of the Landowner Procedures
13 were neither authorized by nor consistent with the Stipulation for Entry of Judgment and the
14 Judgment, and did not satisfy the Court’s mandate in the Statement of Decision that the rules and
15 procedures be fair, equitable, necessary and equally applied to all overlying landowners. The
16 Challenging Parties specifically objected to provisions in the Landowner Procedures: (1) that
17 authorized the voting parties to cast the entirety of their votes for each of the two landowner
18 Watermaster Seats; (2) that allowed the Public Overliers on Exhibit 4 to cast votes in the election
19 of the landowner Watermaster Seats; (3) that elected a single “Landowner Alternate,” as the
20 third-highest vote-getter; (4) that provided for initial two and four year terms and the subsequent
21 staggering of terms for the landowner Watermaster Seats; and (5) that fail to expressly require
22 that the Landowner Procedures and any other Watermaster formation rules and procedures must
23 be approved by the Court and cannot be unilaterally imposed by any party or group of parties.

24 At the hearing, reports were given that the following individuals had been selected to fill
25 the respective Watermaster Seats:
26
27
28

1 1. Attorney Jeffrey Dunn, counsel for Los Angeles County Waterworks District No.
2 40 (“District 40”) reported that District 40 had selected Adam Arika to the District 40
3 Watermaster Seat.

4 2. Attorney Keith Lemieux, counsel for Littlerock Creek Irrigation District, reported
5 that the Public Water Suppliers had elected Leo Thibault to the “Elected” Public Water Supplier
6 Watermaster Seat.

7 3. Attorney Leland McElhaney, counsel for AVEK, reported that AVEK had
8 selected Robert Parris to the AVEK Seat.

9 4. Attorney Thomas Bunn, counsel for Palmdale Water District, reported that Cathy
10 Mac Laren had been selected as an alternate to the “elected” Public Water Supplier Seat, to
11 which no objections were raised either prior to or at the hearing.

12 5. U.S. Attorney James DuBois, counsel for the United States Department of Justice,
13 reported that Gerald Boetsch had been selected as the United States Department of Defense
14 Liaison representative to the Watermaster Board (“DoD Liaison”), to which no objections were
15 raised at the hearing.

16 Having considered the Objections, Opposition, Response and other relevant papers filed,
17 and the arguments and reports of counsel,

18 **The Court makes the following findings and determinations:**

- 19 1. The party representatives who will serve on the Watermaster Board, and all rules
20 and procedures used to elect or appoint representatives to the Watermaster Board,
21 including any Alternates and the DoD Liaison, are subject to the Court’s final
22 approval.
- 23 2. The Inspector of Elections conducted the election of the landowner Watermaster
24 Seats fairly, openly and in accordance with the Landowner Procedures, and
25 afforded sufficient notice and due process to all parties who wished to participate.
- 26 3. The Challenging Parties’ objections to those Landowner Procedures: (1) that
27 authorized the voting parties to cast the entirety of their votes for each of the two
28

landowner Watermaster Seats; and (2) that allowed the Public Overliers on Exhibit 4 to cast votes in the election of the landowner Watermaster Seats are **overruled.**

4. The Challenging Parties concerns with the Landowner Procedures: (3) that called for the election of a single “Landowner Alternate,” as the third-highest vote-getter; (4) that provided for initial two and four year terms and the subsequent staggering of terms for the landowner Watermaster Seats; and (5) that fail to expressly require that the Landowner Procedures and any other Watermaster formation rules and procedures must be approved by the Court and cannot be unilaterally imposed by any party or group of parties are subject to further meet and confer between the parties.

5. The Court approves an *interim* Watermaster Board (“*Interim* Watermaster”) composed as follows:

- a. District 40 Seat – Adam Ariki
- b. “Elected” Public Water Supplier Seat – Leo Thibault
- c. AVEK Seat – Robert Parris
- d. Landowner Seat – Dennis Atkinson
- e. Landowner Seat – John Calandri

6. The Watermaster is further subject to the Court’s approval of all rules and procedures used to elect or appoint representatives to the Watermaster Board, including any Alternates and the DoD Liaison (“Watermaster Election Rules and Procedures”) to be prepared by the parties and submitted to the Court for final approval in accordance with this Order.

7. The *interim* Watermaster is hereby authorized to develop and publish a “Request for Proposals” (“RFP”) for the position of Watermaster Engineer. .

1 8. The Court expresses its sincere appreciation to U.S. Attorney James DuBois for
2 his services as the Inspector of Elections and hereby relieves Mr. DuBois from
3 that service.

4 **IT IS HEREBY ORDERED** that all parties seeking or appointing representatives on the
5 Watermaster Board, including Los Angeles Waterworks District No. 40, the Public Water
6 Suppliers, AVEK and the Overliers listed on Exhibit 4 to the Judgment, shall meet and confer
7 and develop proposed Watermaster Election Rules and Procedures consistent with this Order.
8 The parties shall submit the proposed Watermaster Election Rules and Procedures to the Court
9 prior to September 6, 2016. On September 6, 2016, at 10:00 am in Los Angeles, at a department
10 to be determined, a hearing shall be held to review and consider the proposed Watermaster
11 Election Rules and Procedures, to hear any objections to the proposed Watermaster Election
12 Rules and Procedures, and to consider final approval of the proposed Watermaster Election
13 Rules and Procedures and the Watermaster Board.

14 **IT IS FURTHER ORDERED** that a detailed statement of the proposed Watermaster
15 Board member's background, education, job history and other qualifying attributes shall be
16 posted on the Court's website prior to the September 6, 2016 hearing, for each *interim*
17 Watermaster Board member, for the provisionally approved "Elected" Public Water Supplier
18 Watermaster Seat Alternate representative, for the DoD Liaison representative, and for any
19 proposed Landowner Alternate representative, for the Court's approval.

21 DATED: _____

22 _____
23 HON. JACK KOMAR
24 JUDGE OF THE SUPERIOR COURT

25 1474577.1 1351-007

PROOF OF SERVICE

I, Olga Rittershaus, declare:

I am a citizen of the United States and employed in Santa Barbara County, California. I am over the age of 18 years and not a party to the within-entitled action. My business address is: Brownstein Hyatt Farber Schreck, LLP, 1020 State Street, Santa Barbara, California 93101. On July 20, 2016, I served a copy of the within document(s):

OPPOSITION TO PROPOSED ORDER AFTER JUNE 30, 2016 HEARING REGARDING WATERMASTER FORMATION AND PROPOSED REVISED ORDER

on the interested parties in this action.



Based on a court order and/or an agreement by the parties to accept service by electronic transmission, I caused the document(s) listed above to be sent to the persons at the electronic notification listed on the OneLegal Online Court Services website.

I am readily familiar with the firm's practice of collection and 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 the ordinary course of business.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on July 20, 2016, at Santa Barbara, California.



Olga Rittershaus

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