

# EXHIBIT A

Drake, Ryan

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**From:** Fife, Michael  
**Sent:** Monday, April 01, 2013 1:46 PM  
**To:** Drake, Ryan  
**Subject:** FW: Bowcock and Lameroux

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**From:** Tom Bunn [mailto:TomBunn@lagerlof.com]  
**Sent:** Monday, April 01, 2013 1:42 PM  
**To:** Fife, Michael  
**Subject:** RE: Bowcock and Lameroux

I did not ask him about them.

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**From:** Fife, Michael [mailto:MFife@bhfs.com]  
**Sent:** Monday, April 01, 2013 1:39 PM  
**To:** Tom Bunn; 'Bradley T. Weeks'; mike@mclachlanlaw.com; sorr@rwglaw.com; cms@eslawfirm.com; RZimmer@clifford-brownlaw.com; lee.leininger@usdoj.gov; bbrunick@bmblawoffice.com  
**Cc:** Drake, Ryan; Herrema, Brad; Jeffrey Dunn  
**Subject:** RE: Bowcock and Lameroux

Great, thanks.

Any feedback re Wilson, Healy and Maritorena?

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**From:** Tom Bunn [mailto:TomBunn@lagerlof.com]  
**Sent:** Monday, April 01, 2013 1:37 PM  
**To:** Fife, Michael; 'Bradley T. Weeks'; mike@mclachlanlaw.com; sorr@rwglaw.com; cms@eslawfirm.com; RZimmer@clifford-brownlaw.com; lee.leininger@usdoj.gov; bbrunick@bmblawoffice.com  
**Cc:** Drake, Ryan; Herrema, Brad; Jeffrey Dunn  
**Subject:** RE: Bowcock and Lameroux

I just talked to Jeff. He agrees to move Jones to the 9<sup>th</sup>.

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**From:** Fife, Michael [mailto:MFife@bhfs.com]  
**Sent:** Monday, April 01, 2013 10:17 AM  
**To:** 'Bradley T. Weeks'; mike@mclachlanlaw.com; sorr@rwglaw.com; cms@eslawfirm.com; RZimmer@clifford-brownlaw.com; lee.leininger@usdoj.gov; bbrunick@bmblawoffice.com  
**Cc:** Tom Bunn; Drake, Ryan; Herrema, Brad  
**Subject:** RE: Bowcock and Lameroux

Yes, though moving Bowcock to the 11th will only work if the County will agree to move Jones to the 9th to be paired with Kyle. I have not been able to get a response from the county on this

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**From:** Bradley T. Weeks [mailto:Brad@charltonweeks.com]

4/1/2013

**Sent:** Monday, April 01, 2013 9:45 AM

**To:** [mike@mclachlanlaw.com](mailto:mike@mclachlanlaw.com); [sorr@rwglaw.com](mailto:sorr@rwglaw.com); Fife, Michael; [cms@eslawfirm.com](mailto:cms@eslawfirm.com); [RZimmer@clifford-brownlaw.com](mailto:RZimmer@clifford-brownlaw.com); [lee.leininger@usdoj.gov](mailto:lee.leininger@usdoj.gov); [bbrunick@bmblawoffice.com](mailto:bbrunick@bmblawoffice.com); Bradley T. Weeks

**Cc:** Tom Bunn

**Subject:** Bowcock and Lameroux

It seems we have all agreed to have Bowcock moved to 4/11/13 at 9:00 and Lameroux to 4/8/13 at 1:00. There is also going to be a Vulcan pmk at 4/11/19 at 9:00

Bradley T. Weeks

1031 West Avenue M-14, Suite A

Palmdale, CA 93551

(661) 265-0969

[www.charltonweeks.com](http://www.charltonweeks.com)

**Drake, Ryan**

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**From:** Fife, Michael  
**Sent:** Friday, March 29, 2013 5:44 PM  
**To:** 'Bradley T. Weeks'; mike@mclachlanlaw.com; sorr@rwglaw.com; cms@eslawfirm.com; RZimmer@clifford-brownlaw.com; lee.leininger@usdoj.gov; bbrunick@bmblawoffice.com  
**Cc:** Scott Kuney; Keith Lemieux; Robert G. Kuhs; Wesley A. Miliband; Tom Bunn; Drake, Ryan; Herrema, Brad  
**Subject:** RE: Antelope Valley Groundwater Liason Committee

In addition we have asked to move Jones from the 11th to the 9th. His water use is related to that of Kyle and it makes sense to coordinate them.

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**From:** Bradley T. Weeks [mailto:Brad@charltonweeks.com]  
**Sent:** Friday, March 29, 2013 5:27 PM  
**To:** mike@mclachlanlaw.com; sorr@rwglaw.com; Fife, Michael; cms@eslawfirm.com; RZimmer@clifford-brownlaw.com; lee.leininger@usdoj.gov; bbrunick@bmblawoffice.com; Bradley T. Weeks  
**Cc:** Scott Kuney; Keith Lemieux; Robert G. Kuhs; Wesley A. Miliband; Tom Bunn  
**Subject:** Antelope Valley Groundwater Liason Committee

Liaison committee:

Attached is the current deposition schedule, I have received a number of requests to change it. The following are the deposition issues and my suggest solutions. If anyone else is aware of a problem, please let me know.

Thomas E. Harder-4/3

He is not available this day, I suggest he be moved to 4/25

John Maritorena-4/2 & Jane Healy-4/2 & Robert Gorrindo-4/5

They are not available on these days due to health reasons. I suggest we move these to 4/9, the next scheduled AGWA depo, to give us time to figure out these issues.

Jan M. H. Hendrickx-4/22

We have agreed to move this to 4/17

Darin Filkins-4/24 & Anthony Leggio-4/24 & Derek Yurosek-4/24

Move these to 4/22. Rich has said these witnesses are available on 4/22 and the morning of 4/23. We need more information regarding who to schedule for when, unless Rich wants they be called sequentially.

Bob Bowcock-4/8

He is unavailable on 4/8. Mike has requested 4/11. We have Robert Jones, Billie Dickey, and John Javadi scheduled for that day.

Craig Van Dam-4/17 & Gary Van Dam-4/17

Because of Hendrickx, we need to move. Based upon Scott's schedule I suggest 4/25

Don Bartz-4/25

Because of Craig and Gary Van Dam we need to move, I suggest 4/19. This will result in double tracking

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with Mark Beuhler. We may be able to move Beuhler, I have not asked.

Steve Cortner

This date is not available.

Open Issues:

Bob Bowcock

John Maritorena

Jane Healy

Robert Gorrindo

Dennis Atkinson (Robert has a trial the day before)

Bradley T. Weeks

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Palmdale, CA 93551

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**Drake, Ryan**

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**From:** Fife, Michael  
**Sent:** Friday, March 29, 2013 11:46 AM  
**To:** Drake, Ryan; Bradley T. Weeks; 'Tom Bunn'  
**Cc:** Jeffrey.Dunn@bbklaw.com; Stefanie.Morris@bbklaw.com; Herrema, Brad; Fife, Michael  
**Subject:** RE: AGWA: Remaining Deposition Scheduling Issues

We have not yet received responses to the issues below. Please respond so that we can get the schedule worked-out. In addition, we have the following issues not listed below:

(1) Bowcock depo. Bob is currently scheduled for the 8th, but he has become unavailable. In that week, he could do the 11th if he can step out at 11:00 for an hour to handle a Chino Basin meeting by phone. We are checking with him for other times.

(2) Wilson and Healy. Healy is currently scheduled for the 2nd in LA. We indicated in the opposition to her notice that she has difficulty traveling and has a doctor's note to that effect. In any event, she is not available in the 2nd. Wilson is currently scheduled for the 9th in LA and also has multiple hardship issues that make that a burden for her. We think we could possibly get Healy to LA on the 9th if we could do Wilson during AGWA week at Charlton & Weeks. Please recall that Wilson is only claiming 14 AF. While below we are recommending that we put Jones and Kyle together on the 9th, we will be able to have two attorneys present so that depositions can be concurrent.

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**From:** Drake, Ryan  
**Sent:** Thursday, March 28, 2013 11:34 AM  
**To:** Bradley T. Weeks  
**Cc:** Jeffrey.Dunn@bbklaw.com; Stefanie.Morris@bbklaw.com; Fife, Michael; Herrema, Brad  
**Subject:** AGWA: Depositions of Julie Kyle and Robert Jones and John Maritorena Schedules

Brad,

There are a few additional AGWA scheduling issues we are bringing to your attention.

First, Julie Kyle's deposition was noticed for downtown LA on April 9. Bob Jones' deposition was noticed for April 11. The Kyles and Bob Jones have a leasing arrangement, as described in their declarations submitted in lieu of deposition. We ask that the depositions of Julie Kyle and Robert Jones occur on the same date at the same time, so that if any issues related to potential duplication arise due to their leasing arrangement, both of them can be examined. We request that you notice the depositions of both Julie Kyle and Bob Jones for the same date and time, 10 am on April 9, as Julie Kyle is unavailable April 10 through the 12th.

Second, as I previously indicated and as stated in our objection to the Notices of Deposition, Bob Gorrindo is out of the country until April 25th. Earlier in March we informed you that Mr. Gorrindo would be out of the country in April and offered to make him available for deposition any time the last week of March. We received no response,

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he was not noticed, and the deposition never took place. Mr. Gorrindo is now available for depositions April 26th and 27th. April 26th is the cutoff discovery date set under the CMO, so we think April 26th would work best.

Third, as I indicated in an email to you this morning and on the phone earlier this week, John Maritorena is seriously ill and remains in intensive care, which he has been in for the last two weeks. Because of his condition there is no way he will be available for depositions or trial testimony, and thus we cannot set a date in this phase of trial. We intend to make a proposal to Judge Komar (with documentation of Mr. Maritorena's condition) that Mr. Maritorena's declaration he signed in lieu of deposition testimony be taken as evidence and that we will present another witness to help substantiate the information presented in the declaration. This witness would be subject to further deposition or cross-examination at trial. We are asking for the consent of the Public Water Suppliers to this proposal, to avoid having to file a protective order to prevent Mr. Maritorena from harassment in his serious condition.

Please let us know if you are amenable to our proposals.

Ryan

**Ryan C. Drake**  
**Brownstein Hyatt Farber Schreck, LLP**  
21 East Carrillo Street  
Santa Barbara, California 93101-2706  
[RDrake@bhfs.com](mailto:RDrake@bhfs.com)  
805.882.1446 tel  
805.965.4333 fax  
805.882.1474 April Robitaille (Assistant)  
[www.bhfs.com](http://www.bhfs.com)

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4/1/2013

**Drake, Ryan**

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**From:** Bradley T. Weeks [Brad@charltonweeks.com]

**Sent:** Wednesday, March 27, 2013 11:45 AM

**To:** Drake, Ryan

**Subject:** Martiorena & Healy

Please give me some dates. I agree to continue both.

Bradley T. Weeks

1031 West Avenue M-14, Suite A

Palmdale, CA 93551

(661) 265-0969

[www.charltonweeks.com](http://www.charltonweeks.com)

4/1/2013



**Drake, Ryan**

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**From:** Fife, Michael  
**Sent:** Wednesday, March 27, 2013 11:02 AM  
**To:** 'Mike McLachlan'; rzimmer@clifford-brownlaw.com; Brad Weeks (brad@charltonweeks.com)  
**Cc:** Steve Orr (sorr@rwglaw.com); Jeff Dunn; Herrema, Brad; Drake, Ryan  
**Subject:** RE: deposition scheduling

I agree. Here is the status of the AGWA depositions and remaining issues:

1. AGWA week. We have been working cooperatively with Brad Weeks and we have a schedule for AGWA week (April 1-5) to occur at the offices of Charlton & Weeks. It has been on calendar since the beginning, so I do not think anyone should complain, and the parties being deposed that week should not be of interest to other counsel. This is about half the people
2. Hendrickx of April 17. It sounds like that is resolved
3. Remaining depositions. These are the depositions to be taken by counsel for Waterworks and they want to do them in LA. These include: Kyle, Calandri, Maritoren, Jones, Gorrindo, Javadi, Dickey, Wilson and Healy. We will need to work-out dates for these people and see notices that conform to the Court order. The only real issues are Wilson and Healy. Ms. Healy has a doctor's note that she cannot travel more than 30 minutes away. Wilson is the sole caregiver for her 90-year old mother, has trouble getting off work to drive to LA for a day, and is burdened by the expense of doing so. Her claim in the adjudication is 14 acre-feet. We would like to ask that Healy and Wilson be included in AGWA week at Charlton & Weeks.

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**From:** Mike McLachlan [mailto:mike@mclachlanlaw.com]  
**Sent:** Wednesday, March 27, 2013 9:41 AM  
**To:** rzimmer@clifford-brownlaw.com; Brad Weeks (brad@charltonweeks.com); Fife, Michael  
**Cc:** Steve Orr (sorr@rwglaw.com); Jeff Dunn  
**Subject:** deposition scheduling

Guys, I think we should get head together and cooperate on the deposition scheduling. The depositions need to be taken. I suggest as to the depositions we discussed that the PWS would be taking the lead on, including AGWA and Bolthouse, that counsel for those landowners identify which identified dates for particular witnesses cannot go on the dates the PWS want, then provide at least two alternative dates.

If someone has a better plan, better suggestions are welcome.

**Mike McLachlan**

Law Offices of Michael D. McLachlan, APC  
10490 Santa Monica Boulevard  
Los Angeles, CA 90025  
Office: 310-954-8270  
Fax: 310-954-8271

4/1/2013