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**Attorneys for:** Gene T. Bahlman, Mark W. and Nancy L. Benz, Thomas and Julie Bookman 2007 Trust, James and Elizabeth Bridwell, Brittner Trust, Glen Brittner, Trustee, John A. Calandri, Calandri Water Company, LLC; John A. Calandri and Shannon C. Calandri as co-trustees of the John and Shannon Calandri 1992 Trust"; Katherine J. Calandri Nelson, Trustee of "The Katherine J. Calandri Nelson 2008 Trust, Sal and Connie L. Cardile, Irma Ann Carle Trust, Irma-Anne Carle, Trustee, Effren Chavez, C. Louise R. Close Living Trust, Del Sur Ranch LLC, Randall and Billie Dickey, Lawrence Dean Evans, Jr. and Susan Evans, Ruth C. Findley, Leah Frankenberg, Denise Godde, Steven F. Godde, Pamela M. Godde and Gary M. Godde; Denise Godde and Steven Godde as Trustees of the D & S Godde Trust, Gorrindo Resourceful LLC, Laura Griffin, trustee of the Family Bypass Trust created under the Leonard W. Griffin And Laura Griffin Trust, dated July 9, 1993, Jane Healy and Healy Enterprises Inc., Gailen W. Kyle and Julie Kyle, Trustees of The Kyle Revocable Living Trust, James M. Leer, III and Diana Leer, Jose M. Maritorena and Marie P. Maritorena, Trustees of the Maritorena Living Trust Dated March 16, 1993, Dennis M. and Diane K. McWilliams, Richard Miner, Barry and Sharon Munz 2014 Revocable Trust, Terry A. & Kathleen M. Munz, Eugene B. Nebeker, Richard Nelson, Willow Springs Co., R and M Ranch, Inc., John and Adrienne Reca, Suzanne J. Richter, Sahara Nursery and Farm, Lawrence J. Schilling and Mary P. Schilling, Trustees of the L&M Schilling 1992 Family Trust, Lilia Mabel Selak, TTEE; Barbara Aznarez Decd Trust and Selak, Mabel Trust, Jeffrey and Nancee Siebert, Tierra Bonita Ranch, Triple M Property Co., Turk Trust dated December 16, 1998, Marie A. Unini and Robert J. LeClair, Vulcan Materials Co., Vulcan Lands Inc., Consolidated Rock Products Co., Calmat Land Co., and allied Concrete & Materials, Michael and Dolores A. Weatherbie, Donna & Lee Wilson, collectively known as the Antelope Valley Groundwater Agreement Association ("AGWA")

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

**ANTELOPE VALLEY**  
**GROUNDWATER CASES**

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 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 No. RIC 353 840, RIC 344 436, RIC 344 668

Judicial Council Coordination Proceeding  
 No. 4408

Lead Case No. BC 325201

Case No.: BC 391869

**RESPONSE TO RICHARD WOOD'S  
 DISCOVERY CONFERENCE BRIEF AND  
 EX PARTE APPLICATION TO  
 CONTINUE HEARING**

Date: January 21, 2016  
 Time: 1:30 P.M.  
 Dept. Telephonic (Courtcall)

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1 On January 15, 2016, Mark Ritter filed a Motion to set aside the judgment as entered  
2 against Mark Ritter, and noticed a hearing on this Motion for February 10, 2016. On January 19,  
3 2016, Richard Wood scheduled an ex parte discovery conference with the Court for January 21,  
4 2016, and filed a lengthy brief that addresses not just the discovery issues but which constitutes a  
5 substantive objection to Mark Ritter's Motion.

6 Issues pertaining to the law firm of Brownstein, Hyatt, Farber, Schreck, LLP and its  
7 relationship to Pauline Ritter play a prominent role in Mr. Wood's filing. It is appropriate that the  
8 Court receive a response to these issues. Such a response can be filed within the statutory time  
9 limits for the February 10, 2016 hearing, but not in time for a January 21, 2016 (i.e., tomorrow)  
10 ex parte hearing.

11 We recommend that the Court allow the briefing for the noticed February 10, 2016,  
12 hearing to be completed. At the scheduled hearing, and when all of the issues are fully briefed,  
13 the Court can decide whether additional information is necessary in order to enable it to rule on  
14 the Motion. If additional discovery is needed in order to provide necessary relevant information,  
15 then such discovery can be ordered at that time.

16 Dated: January 20, 2016

BROWNSTEIN HYATT FARBER SCHRECK, LLP

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18  
19 By: 

MICHAEL T. FIFE  
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ATTORNEYS FOR AGWA

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