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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **FOR THE COUNTY OF LOS ANGELES - CENTRAL DISTRICT**

10  
11 Coordination Proceeding,  
Special Title (Rule 1550(b))

Judicial Council Coordination  
Proceeding No. 4408

LASC Case No.: BC 325201

12  
13 **ANTELOPE VALLEY**  
14 **GROUNDWATER CASES**

Santa Clara Court Case No. 1-05-CV-049053  
Assigned to the Hon. Jack Komar, Judge of  
the Santa Clara Superior Court

15  
16 **WATERMASTER'S CLOSING BRIEF IN**  
17 **OPPOSITION TO THE PEOPLE**  
**CONCERN, INC'S MOTION FOR**  
**ACTION AND IMPLEMENTATION**

18  
19 **AND ALL RELATED ACTIONS**

Hearing Date: October 18, 2023  
Time: 9:00 a.m.  
Dept: 3

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1 **I. INTRODUCTION**

2 By way of its Motion, The People Concern, Inc., as agent for Barrel Springs Properties, LLC  
3 (“**Barrel Springs**”) asks the Court to compel the Antelope Valley Watermaster (“**Watermaster**”) to  
4 approve Barrel Springs’ application for New Production (the “**Application**”) for a farming and  
5 farmworker housing development project (the “**Project**”) based solely on the fact that the  
6 Watermaster Engineer made certain written findings (the “**Findings**”) that Material Injury associated  
7 with the proposed New Production would be negligible. Barrel Springs ignores the Watermaster’s  
8 inherent discretion under the Judgment to approve or deny applications for New Production based  
9 on a wide variety of factors as appropriate to protect the health of the Basin.

10 First, the Watermaster Engineer is not the governing body whose decision is subject to  
11 review by this Court. Rather, the Watermaster Engineer acts in an advisory capacity to the  
12 Watermaster Board, and must make certain findings—namely Material Injury findings—as a  
13 precondition to the Watermaster Board taking certain actions to approve a proposed use of  
14 Groundwater in the Basin. The Watermaster Engineer is not vested with any authority under the  
15 Judgment to make decisions or take actions on its own. That authority is vested entirely with the  
16 Watermaster Board. The decision under review in this and all instances is the decision of the  
17 Watermaster, which decision is informed by—but not mandated by—the review and analysis of  
18 the Watermaster Engineer.

19 Second, the court’s review of the Watermaster’s action to deny the Application is not  
20 subject to the standard of review applicable to appellate or mandamus actions, but rather the  
21 standard of review applicable to court review of the decisions of a court-appointed referees.  
22 Therefore, *any* evidence, regardless of whether it was in the record at the time of the Watermaster  
23 action, can serve as the basis for the Court to uphold the Watermaster’s action.

24 Finally, the evidence in the record supports the Watermaster’s action to deny the  
25 Application. The record is replete with evidence that multiple members of the Watermaster Board  
26 continue to have unanswered questions and concerns about adequate groundwater supply to the  
27 Project, potential impacts to neighboring wells, and other issues, notwithstanding the Watermaster  
28 Engineer’s finding of no Material Injury.

1 **II. ALL EXHIBITS SUBMITTED BY BOTH PARTIES HAVE BEEN ADMITTED**  
2 **INTO EVIDENCE BY THE COURT AND BY STIPULATION OF THE PARTIES**

3 Barrel Springs has requested that the Court rule on its pending Motions to Strike and  
4 Objections to Evidence, however *all* exhibits submitted by both parties (Exhibits 1 – 80) have  
5 been admitted into evidence by the Court and by stipulation of the parties.

6 As a preliminary matter, the transcript of the October 18, 2023 hearing on this matter  
7 makes clear that counsel for Barrel Springs stipulated *twice* on the record as to the admissibility  
8 of *all* exhibits submitted by Barrel Springs and the Watermaster. (*See* Transcript at 6:15-22  
9 (Barrel Springs counsel “stipulating to the admissibility of all exhibits”); *see also* Transcript at  
10 204:6-8 (Court confirming that “all [] exhibits 1-80 are stipulated as admissible”); *see also*  
11 Court’s Minute Order for the October 18, 2023 hearing at 9:12 a.m. (“Parties stipulate to admit all  
12 exhibits listed on the filed exhibit lists.”).) Moreover, counsel for Barrel Springs stipulated that  
13 there were no objections to the admissibility of the Watermaster’s Request for Judicial Notice,  
14 which includes the Watermaster’s Exhibits 67 through 71. (*See* Transcript at 204:10-18.) For this  
15 reason alone, the Court need not rule upon Barrel Springs’ request for a ruling on its evidentiary  
16 motions, and should consider all of the evidence submitted at the hearing on this matter.

17 To the extent the Court deems it necessary to rule upon Barrel Springs’ evidentiary  
18 motions, they should be denied. The declarations of Rob Parris and Russel Bryden are admissible  
19 and relevant to the basis for Director MacLaren’s decision not to approve the Application. The  
20 Parris declaration also supports Director MacLaren’s testimony relating to what occurred at the  
21 settlement conference on May 25, 2023 and thereafter. These declarations are relevant and  
22 probative because: (1) they are consistent with Director MacLaren’s view of the continuing  
23 concerns about the Application which are shared by three members of the Watermaster Board up  
24 to this very moment; and (2) Barrel Springs’ refusal to provide follow up information to the  
25 Watermaster Board as requested after April 26, 2023 refutes the testimony of Mr. Maceri, Ms.  
26 Collins and Mr. Waxman, all of whom submitted declarations relating to events after April 26th.  
27 If the Court were to strike the Parris declaration based on its recitation of events after April 26th  
28 as being “irrelevant,” it should in fairness strike in their entirety the declarations of Claire Collins

1 and Mr. John Maceri that are devoted entirely to recalling events *after* April 26th. In short, Barrel  
2 Springs’ motion to strike, if granted, would result in only admitting one side of the story to testify  
3 about events after April 26th.

4 **III. ACTION BY THE WATERMASTER BOARD—NOT THE WATERMASTER**  
5 **ENGINEER—IS UNDER REVIEW BY THIS COURT**

6 Throughout these proceedings, Barrel Springs has attempted to focus the Court’s review  
7 on whether the Watermaster Engineer’s Material Injury analysis is correct, characterizing the  
8 Watermaster Engineer’s determination as the be-all and end-all of the New Production application  
9 process. Barrel Springs misinterprets the New Production application process as ministerial, such  
10 that so long as the applicant provides certain information and the Watermaster Engineer makes  
11 certain Material Injury findings, the application must be approved, regardless of any Watermaster  
12 Board concerns about issues that may impact other Parties and the health of the Basin. Barrel  
13 Springs seeks to eliminate the Watermaster’s clear discretion to investigate and seek additional  
14 information beyond the Engineer’s Material Injury findings before approval. This is contrary to  
15 the process and procedure for considering and acting upon applications for New Production set  
16 forth in Paragraphs 18.5.3 of the Judgment and Section 14 of the Rules and Regulations.

17 Specifically, the Watermaster Engineer is tasked with: (1) determining the reasonableness  
18 of proposed New Production, (2) evaluating whether the proposed New Production will cause  
19 Material Injury, and (3) providing a *recommendation* to the Watermaster Board that the  
20 application for New Production be approved or denied. (Judgment at 18.5.13, 18.5.13.2.)

21 As a baseline, the Watermaster Engineer is prohibited from recommending approval of a  
22 New Production application unless it has found that such New Production will not cause Material  
23 Injury. However, both the Watermaster Engineer and the Watermaster Board are expected to  
24 perform independent discretionary review of the facts and circumstances surrounding an  
25 application for New Production prior to approving or denying the application (or in the case of the  
26 Watermaster Engineer, *recommending* approval or denial to the Board). The Judgment at  
27 Paragraph 18.5.13 provides in relevant part as follows:

28 “The Watermaster Engineer shall determine whether a Party or Person seeking to  
commence New Production has established the reasonableness of the New

1 Production in the context of all other uses of Groundwater in the Basin at the time  
2 of the application, including whether all of the Native Safe Yield is then currently  
3 being used reasonably and beneficially. Considering common law water rights and  
4 priorities, the mandate of certainty in Article X, section 2, and all other relevant  
5 factors, the Watermaster Engineer has authority to recommend that the application  
6 for New Production be denied, or approved on condition of payment of a  
7 Replacement Water Assessment.”

8 Thereafter, assuming the Watermaster Engineer recommends approval, the Watermaster Board  
9 must make a *discretionary* decision to “consider and determine whether to approve applications  
10 for New Production *after consideration of* the recommendation of the Watermaster Engineer.”  
11 (Judgment at 18.4.9 (emphasis added); *see also* Judgment at 18.5.13.3 (“No Party or Person shall  
12 commence New Production of Groundwater from the Basin absent recommendation by the  
13 Watermaster Engineer *and* approval by the Watermaster.”) (emphasis added).)

14 The Judgment is clear that the Watermaster’s Material Injury determination regarding an  
15 application for New Production is not dispositive of whether the application should be  
16 approved—only whether the application *may* be approved. (Judgment at 18.5.13 (“[T]he  
17 Watermaster Engineer has authority to *recommend* [to the Watermaster] that the application for  
18 New Production be denied, or approved on condition of payment of a Replacement Water  
19 Assessment.”) (emphasis added).)

20 Consideration of an application for New Production therefore involves at least two  
21 discretionary reviews: first, the Watermaster Engineer must evaluate the reasonableness of use of  
22 the proposed New Production and make a Material Injury determination and a *recommendation*  
23 for approval or denial; and second, the Watermaster must *consider* the Watermaster Engineer’s  
24 recommendation and take action thereon.

25 Nothing in the Judgment makes the Watermaster Engineer’s review and approval a  
26 ministerial process whereby certain application conditions are satisfied and the Watermaster’s  
27 review and approval is automatic and a foregone conclusion. To the contrary, the Watermaster is  
28 authorized and obligated to consider all applications—New Production or otherwise—in light of  
the impacts to the entirety of the Basin and all potentially impacted Parties in furtherance of the  
Court’s jurisdiction to protect the overall health of the Basin and ensuring reasonable and

1 beneficial use of the Groundwater therein. The Court agrees with this interpretation. (*See*  
2 Transcript at 148:25 – 149:4 (Court’s statement) (“It’s not the decision of the Watermaster  
3 Engineer as to whether or not the petition or application should be approved. That’s entirely up to  
4 the Watermaster, and it must follow the standards set forth in the judgment.”).)

5 The Application is unique given the lack of hydrogeologic data regarding the surrounding  
6 area of the Basin, and uncertainties regarding its potential impacts to the Basin. (*See* Transcript at  
7 154:21-25 (Watermaster Engineer testimony regarding geologic conditions in the Project area  
8 contributing to the high level of hydrologic uncertainty); *see also* Transcript at 157:21-24  
9 (Watermaster Engineer’s testimony that “in the [A]pplication there was a higher level of  
10 uncertainty than we typically run into in most applications [for New Production]”).)

11 Although the Watermaster Engineer made a no Material Injury determination and  
12 recommended approval of the Application based on the limited data available at the time the  
13 Findings were generated, at least one member of the Watermaster Board still has questions about  
14 potential impacts to nearby wells, whether the geology surrounding the Project area will preclude  
15 any recharge from Replacement Water, and whether the numbers presented in the Application  
16 will realistically serve the proposed domestic uses of the Project. Barrel Springs was provided  
17 with an opportunity to answer all these questions, but refused to engage further with the  
18 Watermaster and instead has sought this Court’s intervention to compel the Watermaster to  
19 approval an application with more questions than answers.

20 The Court should not disturb the Watermaster’s sound discretion to investigate pertinent  
21 details of an unprecedented application for New Production in furtherance of the Court’s  
22 directives under the Judgment, notwithstanding the Watermaster Engineer’s no Material Injury  
23 determination.

24 **IV. THE COURT IS FREE TO CONSIDER ANY EVIDENCE SUPPORTING THE**  
25 **WATERMASTER’S ACTION TO DENY THE APPLICATION**

26 Barrel Springs continues to incorrectly characterize its Motion as a writ of administrative  
27 mandate arising from the quasi-judicial proceedings. However, the Court exercises original  
28 (rather than appellate) jurisdiction when reviewing and ruling upon a Watermaster Board action



1 under the terms of the Judgment. (*See* Judgment at 6.5 (“The Court retains and reserves full  
2 jurisdiction, power and authority for the purpose of enabling the Court, upon a motion of a Party  
3 or Parties noticed in accordance with the notice procedures of Paragraph 20.6 hereof, to make  
4 such further or supplemental order or directions as may be necessary or appropriate to interpret,  
5 enforce, administer or carry out this Judgment and to provide for such other matters as are not  
6 contemplated by this Judgment and which might occur in the future, and which if not provided for  
7 would defeat the purpose of this Judgment.”); *see also* Judgment at 18.3 (the “Court retains and  
8 reserves full jurisdiction, power, and authority to remove any Watermaster”); *see also* Judgment  
9 at 18.4 (the Watermaster’s powers and duties remain “[s]ubject to the continuing supervision and  
10 control of the Court”).)

11 As set forth in Paragraph 20.3.4 of the Judgment, “[t]he Court’s review [of an action or  
12 decision of the Watermaster] shall be *de novo* and the Watermaster’s decision or action shall have  
13 no evidentiary weight in such proceeding.” Whether and to what extent Director MacLaren  
14 articulated her specific bases for denying the Application is inapposite. The case law cited by  
15 Barrel Springs is likewise inapposite, to the extent it relates to the standard of appellate review of  
16 the decisions of a trial court or local agency under C.C.P. Section 1094.5.

17 Unlike these tribunals and agencies, the Watermaster Board was created by the Court. It  
18 accordingly functions as a court-appointed referee, and its decisions are purely advisory. (C.C.P.  
19 § 644(b).) In ruling on Barrel Springs’ Motion, the Court is free to consider any evidence bearing  
20 on the correctness of the Watermaster Board’s decision, and is *not* restricted to evidence  
21 considered by the Watermaster Board. The Court accordingly should uphold the Watermaster  
22 Board’s action to deny the Application regardless of what evidence was in the record at the time  
23 of the action, so long as the evidence presented to the Court supports the outcome.

24 Barrel Springs misses the mark on this issue by misconstruing the applicable standard of  
25 review. The Court may uphold the Watermaster’s action to deny the Application based on *any*  
26 evidence currently before it, whether such evidence was available at the time of Director  
27 MacLaren’s “no” vote or thereafter.

28 As discussed below, the evidence in the record clearly shows that Director MacLaren’s

1 “no” vote—and therefore the Watermaster’s action—is justified.

2 **V. THERE IS AMPLE EVIDENCE BEFORE THE COURT TO UPHOLD THE**  
3 **WATERMASTER’S ACTION TO DENY THE APPLICATION**

4 The evidence shows seven areas of concern identified by multiple members of the  
5 Watermaster Board regarding the Application that remain unanswered:

- 6 **1. Whether the Application is correct in its water calculations for domestic use.** This  
7 information is pertinent to the concern that the proposed amount of New Production  
8 may not provide an adequate domestic supply for the proposed use, thereby potentially  
9 necessitating alternative water sources from public agencies or imported water.
- 10 **2. Whether Replacement Water is capable of recharging the pertinent area of the**  
11 **Basin in which the Project is located.** This information is pertinent to the concern  
12 that the Findings incorrectly assume that payment of Replacement Water Assessments  
13 for the purchase of Replacement Water will adequately mitigate the hydrogeologic  
14 effects of the proposed New Production.
- 15 **3. Whether there is potential for the Project to impact nearby wells in the area.** This  
16 information is also pertinent to concerns regarding the Material Injury analysis in the  
17 Findings, and whether there is sufficient evidence to conclude that no nearby wells  
18 will be impacted by the proposed New Production.
- 19 **4. Whether the Project is impacted by, and in compliance with, the rules pertaining**  
20 **to Small Community Water Systems.** This information is again pertinent to the  
21 concern that the proposed well may not supply enough water for the Project’s  
22 domestic demands, potentially necessitating a public agency, such as Palmdale Water  
23 District, to provide water to the Project, notwithstanding the financial constraints.
- 24 **5. Whether the Project’s location near the State aqueduct will have negative**  
25 **impacts to water in the Basin.** This information is pertinent to concerns regarding the  
26 Project’s potential to contaminate other sources of water in the Basin.
- 27 **6. Whether the Watermaster has ever approved a similar New Production**  
28 **application in the past.** This information is pertinent to the concern that Barrel

1 Springs is asking for more New Production for domestic use for a new project than has  
2 ever been considered—much less acted upon—by the Watermaster.

3 **7. Whether Barrel Springs will agree to a successful aquifer test as a condition of**  
4 **approval of the Project.** This information is pertinent to the above-stated concern that  
5 the proposed well may not produce sufficient water to meet the Project’s domestic  
6 demands, and the aforementioned problems that could arise from such failure.

7 Each of these questions was set forth in Watermaster General Counsel’s letter to Barrel  
8 Springs’ counsel on May 25, 2023. (Exhibit 78.) These questions were generated by Director  
9 MacLaren, Director Parris and the Watermaster Engineer, and were intended to give Barrel  
10 Springs the opportunity to respond to and satisfy Watermaster Board concerns regarding the  
11 Project. (Transcript at 113:20-114:8.) Barrel Springs never provided any substantive responses to  
12 these questions other than the perfunctory, “you already have this information,” or “this  
13 information is irrelevant.” (Exhibit 51). To the contrary, to date these questions have not been  
14 adequately addressed. The declarations of Rob Parris, Russell Bryden and Kathy MacLaren,  
15 admitted into evidence as Exhibits 75, 76 and 77, respectively, demonstrate that each of these  
16 Watermaster Board members has identified potential issues with the Project that necessitated  
17 further clarification before the Board should approve the Application, all of which were included  
18 with their input in Watermaster General Counsel’s May 25, 2023 letter.

19 The live testimony of Watermaster Director Kathy MacLaren, the key witness at the  
20 hearing on Barrel Springs’ Motion, further demonstrates the validity of these still outstanding  
21 questions, and the legitimate basis for the Watermaster’s action to deny the Application.

22 By way of background, Director MacLaren has extensive experience in groundwater-  
23 related matters through many decades of public service as an elected or appointed official in the  
24 Antelope Valley. She is a director of Division 4 at Palmdale Water District, and served on the  
25 Palmdale Planning Commission. (Transcript at 14:11-13, 17:2-4, 66:19-21, 105:15 – 106:10.) She  
26 also serves as a Public Water Supplier representative on the Watermaster Board, representing the  
27 following public agencies under the Judgment: Los Angeles County Water Works District No. 40,  
28 Palmdale Water District, Littlerock Creek Irrigation District, Rosamond CSD, Desert Lake CSD,

1 North Edwards Water District, California Water Service Company, Palm Ranch Irrigation  
2 District, Quartz Hill Water District, and the cities of Palmdale and Lancaster. (Transcript at 15:24  
3 – 16:2, 27:12-14; Exhibit 13; Judgment at 18.1.1.) In these positions she has reviewed numerous  
4 technical hydro-geologic reports. (Transcript at 106:11-14.)

5 Director MacLaren spent approximately ten hours reviewing the Engineer’s Findings—  
6 which were in her possession since at least as early as January 25, 2023—in detail before she  
7 voted not to approve the Application on April 26, 2023. (Transcript at 106:24-108:1 (stating that  
8 she read the Findings “ad nauseam” and “read it and researched and contemplated on different  
9 things after reading it” at least three months prior to voting not to approve the Application).) Prior  
10 to the January 2023 Watermaster Board meeting at which the Application was originally  
11 scheduled to be considered, Director MacLaren extensively researched the Watermaster Rules and  
12 Regulations on New Production applications, and discussed those rules as they applied to the  
13 Application with Dennis LaMoreaux, Palmdale Water District General Manager and Chair of the  
14 Advisory Committee to the Watermaster. (Transcript at 30:13 – 31:21.) Director MacLaren also  
15 personally visited the Project site on two occasions prior to the April 26, 2023 Watermaster Board  
16 meeting. (Transcript at 109:4-10.)

17 Among Director MacLaren’s concerns about the Application and the operations of the  
18 Project, was the fact that Barrel Springs was not going to be required to install a test well as a  
19 condition of approval. Director MacLaren testified that she and other Watermaster Board  
20 members were concerned that the Project may not have adequate water supply through its well,  
21 and may eventually be forced to rely on other water sources, such as Palmdale Water District or  
22 imported water. (Transcript at 38:18 – 40:21, 56:12-24, 57:19-23, 179:16 – 180:6.) In addition,  
23 Director MacLaren testified that she was concerned about the lack of data on nearby wells that  
24 could be impacted by the Project (data that still has not been provided by Barrel Springs), as well  
25 as the potential limitations on the ability of Replacement Water to recharge the area of the Basin  
26 in which the Project is located. (75:13-23, 76:3-8 (“as a person who is in charge of the health of  
27 the basin, you should be concerned where wells are put if there cannot be sufficient recharge,  
28 because subsidence is something that is a very serious, serious issue”).) Each of these concerns

1 was articulated in the Watermaster General Counsel email of May 25, 2023. (Exhibit 78.) For  
2 these reasons the Application was the most divisive and controversial application for New  
3 Production that has ever come before the Advisory Committee for consideration. (Transcript at  
4 111:16-20.)

5 In response to the Court’s inquiry as to what part of the Findings caused her to vote  
6 against approval of the Application, Director MacLaren testified that she had concerns about the  
7 general “hydrological uncertainty” associated with all of the Watermaster Engineer’s conclusions  
8 in the Findings. (Transcript at 84:7-11 (“We don’t totally understand everything – of all of our  
9 aquifer conditions, all of our wells, we don’t understand, including the lithological data,  
10 construction information and test results. All these things should be provided to the  
11 Watermaster.”); *see also* Transcript at 88:18-19 (“the day that I took that vote, there was  
12 uncertainty” regarding the ability of the proposed well to produce as much as was intended).)

13 In fact, the Watermaster Engineer testified that she made a point to present the Application  
14 to the Watermaster Board in a way that conveyed this uncertainty, and the limitations on the data  
15 underlying the finding of no Material Injury. (Transcript at 188:11-24 (“What I recall from the  
16 presentation is that it gave a summary of the project and it included some information about what  
17 the aquifer conditions tend to look like in the San Andreas Fault zone in Antelope Valley and why  
18 *there was such a high level of uncertainty on this application that surpassed what we typically*  
19 *have in most of the applications that we consider.* Because as the Watermaster Engineer, we felt  
20 that the board needed to know that we did say that material injury, as defined by the judgment,  
21 appeared to be negligible. *But that was made with this limited information that we had and there*  
22 *was a much higher level of uncertainty for this application than most.”) (emphasis added).)*

23 As set forth above, members of the Watermaster Board have the discretion to deny an  
24 application for New Production notwithstanding a recommendation for approval from the  
25 Watermaster Engineer in the event there are additional concerns about the impacts of the  
26 proposed groundwater use. (Transcript at 94:25 – 95:3 (Director Maclaren testimony) (“we as  
27 board members have the discretion, have the ability to disagree with the findings and do like I  
28 concluded that day and voted no.”).)

1 The Court agrees with this analysis, and after hearing most of Director MacLaren's  
2 testimony, stated as follows:

3 "There's no question that we do have a report from the Watermaster Engineer that  
4 is somewhat equivocal in terms of the data upon which the recommendation is  
5 based. That seems to me, that gives rise to a serious question for the board member  
6 as to whether or not they can endorse the recommendation from their employee.  
And so far, we've not heard any other evidence as to what's going to fill in the  
blanks, and there are a lot of blanks."

7 (Transcript at 132:12-22.) The Court went on to note that "[Director MacLaren] read the  
8 [Findings], and based upon the [Findings], she's testified that she had reservations about the data  
9 that was missing and what impact that would have on the aquifer, which the [Watermaster] board  
10 obviously has a responsibility to address." (Transcript at 133:1-5.) The Court concluded by  
11 stating:

12 "[T]he record is pretty clear as to what the concerns were and what the reason  
13 was, at least from Ms. MacLaren, why she voted the way she did. And certainly  
14 what happened after that or even before that is also pretty clear. There's – from  
15 what I've heard from the evidence, there's an absence of a lot of information that  
was not contained – not known by the engineer at the time the [Findings were]  
prepared, which led to the conclusion that they came to."

16 (Transcript at 145:8-18.) The Court has a clear understanding of the bases for the Watermaster's  
17 action to deny the Application based on the evidence in the record, and should not disturb the  
18 Watermaster's decision in this regard.

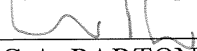
19 **VI. CONCLUSION**

20 For the above-stated reasons, the Watermaster respectfully requests that the Court deny  
21 Barrel Springs' Motion in its entirety.

22 Respectfully submitted,

23 Dated: November 6, 2023

PRICE, POSTEL & PARMA LLP

24  
25 By:   
26 CRAIG A. PARTON  
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**PROOF OF SERVICE**

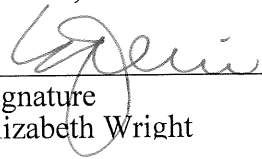
STATE OF CALIFORNIA, COUNTY OF SANTA BARBARA

I am employed in the County of Santa Barbara, State of California. I am over the age of eighteen (18) and not a party to the within action. My business address is 200 East Carrillo Street, Fourth Floor, Santa Barbara, California 93101.

On November 6, 2023, I served the foregoing document described **WATERMASTER'S CLOSING BRIEF IN OPPOSITION TO THE PEOPLE CONCERN, INC'S MOTION FOR ACTION AND IMPLEMENTATION** on all interested parties in this action by placing the original and/or true copy.

- BY ELECTRONIC SERVICE:** I posted the document(s) listed above to the Santa Clara County Superior Court Website @ [www.scefilings.org](http://www.scefilings.org) and Glotrans website in the action of the Antelope Valley Groundwater Cases.
- (*STATE*) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.
- (*FEDERAL*) I hereby certify that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.

Executed on November 6, 2023, at Santa Barbara, California.

  
\_\_\_\_\_  
Signature  
Elizabeth Wright