

1 CRAIG A. PARTON, State Bar No. 132759
PRICE, POSTEL & PARMA LLP
2 200 East Carrillo Street, Fourth Floor
Santa Barbara, California 93101
3 Telephone: (805) 962-0011
4 Facsimile: (805) 965-3978

Exempt from Filing Fees
Government Code § 6103

5 Attorneys for
Antelope Valley Watermaster
6
7

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))
12

Judicial Council Coordination
Proceeding No. 4408

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

LASC Case No.: BC 325201

Assigned to the Hon. Jack Komar, Judge of the
Santa Clara Superior Court

Santa Clara Court Case No. 1-05-CV-049053

**NOTICE OF ERRATA TO
WATERMASTER'S OPPOSITION TO
LONG VALLEY ROAD, L.P.'S MOTION
FOR LEAVE TO INTERVENE IN
JUDGMENT; DECLARATIONS OF
CRAIG A. PARTON, MICHAEL D.
MCLACHLAN, AND JEFFREY V. DUNN
IN SUPPORT THEREOF**

20
21 Date: November 1, 2018
22 Time: 9:00 A.M.
23 Dept: Courtcall
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TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD:

NOTICE is hereby given that Watermaster's Opposition to Long Valley Road, L.P.'s Motion for Leave to Intervene in Judgment, electronically served and filed on October 19, 2018, inadvertently omitted Exhibits A through D which are referenced in the Declaration of Jeffrey V. Dunn.

Therefore attached hereto are true and correct copies of Exhibits A through D to the Watermaster's Opposition to Long Valley Road, L.P.'s Motion for Leave to Intervene in Judgment which are referenced in the Declaration of Jeffrey V. Dunn.

Respectfully submitted,

Dated: October 19, 2018

PRICE, POSTEL & PARMA LLP

By: Craig A. Parton
CRAIG A. PARTON
Attorneys for
Antelope Valley Watermaster

Exhibit A

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

ANTELOPE VALLEY GROUNDWATER
CASES

Judicial Council Coordination Proceeding
No. 4408
(Hon. Jack Komar)

RICHARD A. WOOD, an individual, on
behalf of himself and all others similarly
situated,

Case No.: BC391869

~~[proposed]~~ **ORDER APPROVING
REVISED CLASS NOTICE FOR
SMALL PUMPER CLASS ACTION**

Plaintiff,

v.

LOS ANGELES COUNTY
WATERWORKS DISTRICT NO. 40; et al.

Defendants.

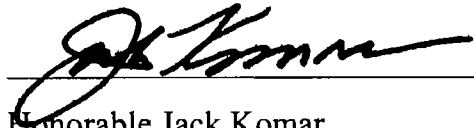
Having received no objections to the revised class notice filed by counsel for the Small Pumper Class, the Court hereby approves the form of notice electronically filed on February 18, 2009.

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Furthermore, except as indicated in that notice, the publication of notice shall otherwise be the same as that for the Willis class, including newspaper publication and website content to be determined by counsel for the class with approval from the public water suppliers.

IT IS SO ORDERED.

Dated: **MAR 13 2009**



Honorable Jack Komar

Exhibit B

*****IF YOU RECEIVED A PRIOR CLASS ACTION NOTICE RELATING TO GROUNDWATER RIGHTS IN THE ANTELOPE VALLEY, THAT NOTICE RELATED TO A DIFFERENT LAWSUIT, DEALING WITH A DIFFERENT CLASS OF LANDOWNERS WITH DIFFERENT RIGHTS. *****

***** IMPORTANT: IF YOU PUMP GROUNDWATER OR YOU OR YOUR PREDECESSORS HAVE EVER PUMPED GROUNDWATER ON YOUR PROPERTY, CAREFULLY READ THIS NOTICE – THIS LAWSUIT MAY AFFECT YOUR RIGHTS TO PUMP GROUNDWATER IN THE FUTURE. *****

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

RICHARD A. WOOD, an individual, on behalf of himself and all others similarly situated,

Plaintiff,

v.

LOS ANGELES COUNTY WATERWORKS DISTRICT NO. 40; et al.

Defendants.

JUDICIAL COUNCIL COORDINATION PROCEEDING No. 4408

NOTICE OF CLASS ACTION FOR THE “SMALL PUMPER” CLASS ACTION

TO CERTAIN ANTELOPE VALLEY LANDOWNERS: CAREFULLY READ AND RESPOND TO THIS NOTICE, AS IT MAY AFFECT YOUR RIGHT TO PUMP GROUNDWATER ON YOUR PROPERTY IN THE FUTURE.

This notice is to advise you about a pending class action lawsuit, referred to as the “Small Pumper” class action. You may be a member of the Class. **PLEASE TAKE THE TIME TO READ THIS IMPORTANT LEGAL NOTICE. YOU ARE REQUIRED TO RETURN THE ATTACHED RESPONSE FORM, EITHER BY MAIL OR BY THE INTERNET, ON OR BEFORE SEPTEMBER 9, 2009.**

This Class Action lawsuit involves water rights in the Antelope Valley Groundwater Basin. Plaintiff Richard Wood brought this case to protect his right and those of other landowners in the Basin to pump water on their properties in the future. The case has been combined with other cases to determine all the groundwater rights in the Basin. The Court has not yet decided the case. This Notice is intended to inform you of the pendency of this case and advise you how you can protect your rights. You have been sent this Notice because as a property owner in the Antelope Valley your rights to pump and use groundwater on your property may be affected by this case.

ARE YOU A MEMBER OF THE CLASS?

You have been designated as a possible class member because records show that you may own improved property in the Antelope Valley. The class includes all private (i.e., non-governmental) landowners within the Antelope Valley Groundwater Basin that have pumped groundwater on their property at any time since 1946, with certain exceptions set out below.

You are **NOT in the Class** if you fall within one of the categories set forth below. **BUT YOUR RIGHTS MAY BE AFFECTED UNLESS YOU RETURN THE ATTACHED RESPONSE FORM AND MAKE CLEAR THAT YOU ARE NOT IN THE CLASS. HENCE, IT IS IMPORTANT THAT YOU RETURN THE RESPONSE FORM AS PROMPTLY AS POSSIBLE, EVEN IF YOU ARE NOT A CLASS MEMBER.**

YOU ARE NOT IN THE CLASS WITH RESPECT TO ANY GIVEN PARCEL OF PROPERTY IF THAT PARCEL FALLS WITHIN ANY OF THE FOLLOWING CATEGORIES:

1. You have pumped 25 acre-feet or more of groundwater for use on a that parcel in any calendar year since 1946; *or*
2. You are a shareholder in a mutual water company in the Antelope Valley; *or*
3. You are already a party to this litigation (but, in that event, you may elect to join the Class).

WHAT IS THE CASE ABOUT?

Under California law, property owners have a right to pump and use groundwater (water underneath the surface) on their land. In this case, however, the naturally available supply of water in the Basin may not be adequate to satisfy everyone who wants to use that water. Plaintiff Richard Wood brought this action to protect his right and that of other Antelope Valley landowners to pump and use the water under their properties and to obtain compensation for any wrongful taking of their property rights. Mr. Wood claims that he and other landowners have water rights which are superior to the rights of certain public water suppliers to use that water. The public water suppliers claim that their historical pumping has given them superior water rights. If the public water suppliers win, your rights to use the groundwater under your property may be cut back. The Court has not yet ruled on these claims.

WHAT DO YOU NEED TO DO?

YOU ARE REQUIRED TO SUBMIT the attached RESPONSE FORM, either by mail or on the internet, by September 9, 2009. The instructions for completing this form are below. All persons who receive this Notice should respond, so that the parties and Court will know whether you are a class member or not.

If you are a Class Member, you have the right to remain in the Class or exclude yourself from the Class. Class Members are defined to include all private (i.e., non-governmental) landowners within the Antelope Valley Groundwater Basin that have pumped groundwater on a given parcel of property at any time since 1946, and who does not fall within any of the exclusions set forth above. Class Members should complete and return the attached response form.

If you remain in the Class:

- You will be bound by the decision in the case, whether favorable or unfavorable.
- Plaintiff Wood and his attorneys will act as your representatives in this case, and you will not personally be obligated to pay any fees or costs out of your pocket.
- You may, but need not, hire your own lawyer at your own expense to represent you.

If you exclude your parcel(s) from the Class:

- Your parcel(s) will not be bound by any decision that affects the Class.
- But you (or your parcel) may be added to the lawsuit as an individual defendant, and you may have to represent yourself or hire a lawyer to represent you.

Please complete the response form on the website for the Small Pumper Class at <http://www.avgroundwater.com/smallpumper/ResponseForm.cfm> by September 9, 2009. Alternatively, you may complete and return the attached response form by mail no later than September 9, 2009 to the following address:

Antelope Valley Groundwater Litigation
P.O. BOX 12013
Riverside, CA 92502-9839

WHERE CAN YOU GET ADDITIONAL INFORMATION?

The complaint, certain other documents from the litigation, and some other general information are available at: <http://www.avgroundwater.com/smallpumper/wood.cfm>. You may complete and submit the response form on that website. In addition, that website has a list of answers to certain other questions you may have. That website has an e-mail address for you to obtain information if you have further questions. That website will be updated from time to time to advise you of the status of this litigation. Also, all of the documents filed in the case are available on the court's website at: <http://www.sceffiling.org/cases/casehome.jsp?caseId=19>

PLEASE DO NOT CALL OR WRITE THE COURT OR CLERK'S OFFICE. IF YOU HAVE ANY QUESTIONS, PLEASE CONSULT YOUR OWN COUNSEL, VISIT THE WEB SITES LISTED ABOVE, OR WRITE TO CLASS COUNSEL AT THE ADDRESS ABOVE.

Dated: June 26, 2009

BY ORDER OF THE SUPERIOR COURT
OF CALIFORNIA FOR THE COUNTY OF
LOS ANGELES

Exhibit C



State of California
 March Fong Eu
 Secretary of State

Form LP-1

CERTIFICATE OF LIMITED PARTNERSHIP
IMPORTANT—Read instructions on back before completing this form

This Certificate is presented for filing pursuant to Section 15621, California Corporations Code.

1. NAME OF LIMITED PARTNERSHIP
 Long Valley Road, L.P.

2. STREET ADDRESS OF PRINCIPAL EXECUTIVE OFFICE CITY AND STATE ZIP CODE
 23475 Long Valley Road Woodland Hills, CA 91367

3. STREET ADDRESS OF CALIFORNIA OFFICE IF EXECUTIVE OFFICE IS IN ANOTHER STATE CITY ZIP CODE
 CA

4. COMPLETE IF LIMITED PARTNERSHIP WAS FORMED PRIOR TO JULY 1, 1984 AND IS IN EXISTENCE ON DATE THIS CERTIFICATE IS EXECUTED.
 THE ORIGINAL LIMITED PARTNERSHIP CERTIFICATE WAS RECORDED ON _____ 19____ WITH THE
 RECORDER OF _____ COUNTY. FILE OR RECORDATION NUMBER _____

5. NAMES AND ADDRESSES OF ALL GENERAL PARTNERS: (CONTINUE ON SECOND PAGE, IF NECESSARY)

A. NAME: Sally Hilton ADDRESS: 23475 Long Valley Road CITY: Woodland Hills STATE: CA ZIP CODE: 91367	C. NAME: ADDRESS: CITY: STATE: ZIP CODE:
B. NAME: ADDRESS: CITY: STATE: ZIP CODE:	D. NAME: ADDRESS: CITY: STATE: ZIP CODE:

6. NAME AND ADDRESS OF AGENT FOR SERVICE OF PROCESS:
 NAME: Sally Hilton
 ADDRESS: 23475 Long Valley Road CITY: Woodland Hills STATE: CA ZIP CODE: 91367

7. ANY OTHER MATTERS TO BE INCLUDED IN THIS CERTIFICATE MAY BE NOTED ON SEPARATE PAGES AND BY REFERENCE HEREIN ARE A PART OF THIS CERTIFICATE.
 NUMBER OF PAGES ATTACHED:

8. INDICATE THE NUMBER OF GENERAL PARTNERS SIGNATURES REQUIRED FOR FILING CERTIFICATES OF AMENDMENT, DISSOLUTION, CONTINUATION AND CANCELLATION.
 NUMBER OF GENERAL PARTNER(S) SIGNATURE(S) IS/ARE:
 PLEASE INDICATE NUMBER ONLY

9. IT IS HEREBY DECLARED THAT I AM (WE ARE) THE PERSON(S) WHO EXECUTED THIS CERTIFICATE OF LIMITED PARTNERSHIP WHICH EXECUTION IS MY (OUR) ACT AND DEED. (SEE INSTRUCTIONS)

Sally Hilton
 SIGNATURE _____ SIGNATURE _____
 General Partner September 13, 1989
 POSITION OR TITLE DATE POSITION OR TITLE DATE
 SIGNATURE _____ SIGNATURE _____
 POSITION OR TITLE DATE POSITION OR TITLE DATE

10. RETURN ACKNOWLEDGEMENT TO:
 NAME _____
 ADDRESS Robert L. Whitmire, Esq.
 CITY Kindel & Anderson
 STATE 555 South Flower Street, Suite 2900
 ZIP CODE Los Angeles, CA 90071

THIS SPACE FOR FILING OFFICER USE
 8926300045
FILED
 In the Office of the Secretary of State
 of the State of California
 SEP 20 1989
 March Fong Eu
 MARCH FONG EU
 SECRETARY OF STATE

Exhibit D

PROOF OF PUBLICATION

The BAKERSFIELD CALIFORNIAN
P.O. BOX 440
BAKERSFIELD, CA 93302

BEST, BEST & KRIEGER, LLP
5 PARK PLAZA SUITE 1500
IRVINE, CA 92614

Ad Number: 11393604 PO #:
Edition: TBC Run Times 4
Class Code Legal Display Only
Start Date 8/2/2009 Stop Date 8/12/2009
Billing Lines 0 Inches 756.00
Total Cost \$ 4,510.80 Account 57195635
Billing BEST, BEST & KRIEGER, LLP
Address 5 PARK PLAZA SUITE 1500
IRVINE, CA 92614

STATE OF CALIFORNIA
COUNTY OF KERN

I AM A CITIZEN OF THE UNITED STATES AND A RESIDENT OF THE COUNTY AFORESAID: I AM OVER THE AGE OF EIGHTEEN YEARS, AND NOT A PARTY TO OR INTERESTED IN THE ABOVE ENTITLED MATTER. I AM THE ASSISTANT PRINCIPAL CLERK OF THE PRINTER OF THE BAKERSFIELD CALIFORNIAN, A NEWSPAPER OF GENERAL CIRCULATION, PRINTED AND PUBLISHED DAILY IN THE CITY OF BAKERSFIELD COUNTY OF KERN,

AND WHICH NEWSPAPER HAS BEEN ADJUDGED A NEWSPAPER OF GENERAL CIRCULATION BY THE SUPERIOR COURT OF THE COUNTY OF KERN, STATE OF CALIFORNIA, UNDER DATE OF FEBRUARY 5, 1952, CASE NUMBER 57610; THAT THE NOTICE, OF WHICH THE ANNEXED IS A PRINTED COPY, HAS BEEN PUBLISHED IN EACH REGULAR AND ENTIRE ISSUE OF SAID NEWSPAPER AND NOT IN ANY SUPPLEMENT THEREOF ON THE FOLLOWING DATES, TO WIT: 8/2/09
8/5/09
8/9/09
8/12/09

ALL IN YEAR 2009

I CERTIFY (OR DECLARE) UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Sivsten Blackburn

DATED AT BAKERSFIELD CALIFORNIA

August 12, 2009

Solicitor I.D.: 0

First Text
SUPERIOR COURT FOR THE STATE OF CALIFORNIA

Ad Number 11393604

SUPERIOR COURT FOR THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

<p>RICHARD A. WOOD, an individual, on behalf of himself and all others similarly situated,</p> <p>Plaintiff,</p> <p>v.</p> <p>LOS ANGELES COUNTY WATERWORKS DISTRICT NO. 40; et al.</p> <p>Defendants.</p>	<p>JUDICIAL COUNCIL COORDINATION PROCEEDING No. 4408</p> <p>NOTICE OF CLASS ACTION FOR THE "SMALL PUMPER" CLASS ACTION</p>
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SUMMARY NOTICE OF PENDENCY OF CLASS ACTION

TO: ALL PERSONS WHO OWN LAND IN THE ANTELOPE VALLEY BASIN AND HAVE PUMPED GROUNDWATER ON THEIR PROPERTIES AT ANY TIME SINCE 1946 ("THE SMALL PUMPER CLASS")

This Summary Notice is to advise you about a pending class action lawsuit that may affect your property rights. Plaintiff Richard Wood is a landowner in the Antelope Valley who alleges on behalf of himself and others similarly situated that such landowners have a right to pump and use the groundwater under their properties and to seek compensation for any wrongful taking of their water rights by the Public Water Suppliers. The Public Water Suppliers claim that their historical pumping has given them a superior right to pump groundwater. If the public water suppliers win, your rights to use the groundwater under your property may be modified.

On September 2, 2008, the Court certified this case to proceed as a class action on behalf of all private (non-governmental) persons who own property in the Basin on which groundwater has been pumped at any time after 1946. If you are a Class Member, you have the right to remain a member of the Class or to exclude yourself from the Class. These rights, as well as the background of the litigation, are more fully detailed in a NOTICE OF PENDENCY OF CLASS ACTION that was recently mailed to the last known addresses of all persons who are believed to be Class Members. **IF YOU HAVE NOT RECEIVED THAT NOTICE, YOU MAY FIND THAT NOTICE AND OTHER RELEVANT DOCUMENTS AT www.avgroundwater.com.** You may also request a copy of that notice by sending an e-mail to: pumperinfo@avgroundwater.com, or by mail to P.O. Box 12016, Riverside, CA 92502-9839. Please note that the deadline to respond is October 11, 2009. **IF YOU PUMP GROUNDWATER IN THE ANTELOPE VALLEY, IT IS IMPORTANT THAT YOU RESPOND IN ORDER TO PROTECT YOUR RIGHTS. PLEASE DO NOT CONTACT THE COURT.**

THE COURT HAS MADE NO DECISION AS TO THE MERITS OF THIS CASE. THIS NOTICE IS NOT AN EXPRESSION OF ANY OPINION ON THE MERITS OF THE CLAIMS ASSERTED IN THIS LAWSUIT.

AUG 2 0 2009

Best Best & Krieger LLP
5 Park Plaza, Suite 1500

Irvine, CA 92614

Affidavit of Publication

-of-

Classified Advertising

Angelina de Cordova

_____ of said County and State being duly sworn, says:

That he is and at all times herein mentioned was a citizen of the United States, over 21 years of age, and not a party to nor interested in the above entitled matter; that he is a principal clerk of the printers and publishers of the **LOS ANGELES TIMES** a newspaper printed and published daily in the said Los Angeles County; that the

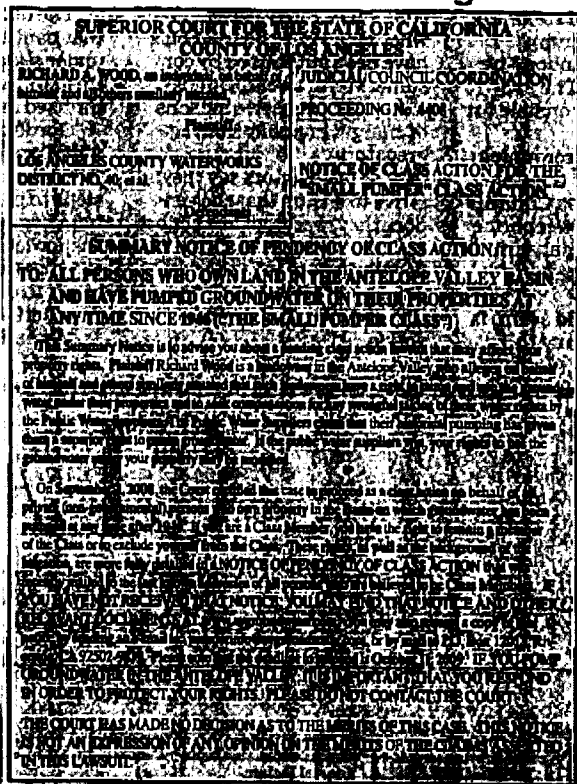
in the above entitled matter of which the annexed is a printed copy, was published in said newspaper

LOS ANGELES TIMES
202 West First St. Los Angeles, CA. 90012

on the following days, to-wit:

Sun; August 2, 2009 & Wed; August 5, 2009

Sun; August 9, 2009 & Wed; August 12, 2009



[Handwritten signature]

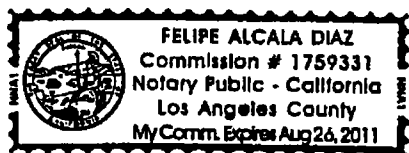
State of California

County of Los Angeles

Subscribed and sworn to (or affirmed) before me on this

20th day of AUGUST, 2009, by
Date Month Year

(1) Angelina de Cordova
Name of Signer



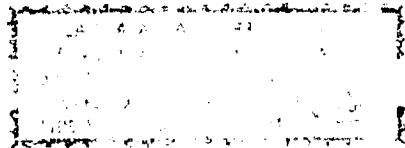
proved to me on the basis of satisfactory evidence to be the person who appeared before me (.)

[Handwritten signature]

**Los Angeles Times
Communications LLC**

Publishers of
Los Angeles Times

Affidavit of Publication of



AFFIDAVIT OF INSERTION

Angela Edwards
Antelope Valley Press
P.O. Box 4050
Palmdale, CA 93590-4050
(661) 940-5368

Advertiser: Best Best Krieger LLP

Day/Date of distribution: Sun Aug 2nd, Wed Aug 5th;

Sun Aug 9th; Wed Aug. 12th

Number of inserts distributed: ROP Advertising

Publication Name: Antelope Valley Press Newspaper

Affidavit Completed:

Date: September 11, 2009

By: Angela Edwards

Title: Advertising Representative



1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA, COUNTY OF SANTA BARBARA

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

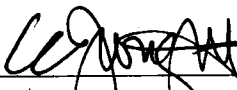
5 On October 19, 2018, I served the foregoing document described as **NOTICE OF**
6 **ERRATA TO WATERMASTER'S OPPOSITION TO LONG VALLEY ROAD, L.P.'S**
7 **MOTION FOR LEAVE TO INTERVENE IN JUDGMENT; DECLARATIONS OF CRAIG**
8 **A. PARTON AND JEFFREY V. DUNN IN SUPPORT THEREOF** on all interested parties in
this action by placing the original and/or true copy.

9 **BY ELECTRONIC SERVICE:** I posted the document(s) listed above to the Santa Clara
County Superior Court Website @ www.scefilng.org and Glotrans website in the action of
10 the Antelope Valley Groundwater Cases.

11 (*STATE*) I declare under penalty of perjury under the laws of the State of California that
the foregoing is true and correct.

12 (*FEDERAL*) I hereby certify that I am employed in the office of a member of the Bar of
13 this Court at whose direction the service was made.

14 Executed on October 19, 2018, at Santa Barbara, California.

15
16 
17 _____
Signature
Elizabeth Wright