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Attorneys for Palm Ranch Irrigation District

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**IN AND FOR THE COUNTY OF LOS ANGELES**

**ANTELOPE VALLEY GROUNDWATER ) Judicial Council Coordination**  
**CASES ) Proceeding No. 4408**

Included Actions:

Los Angeles County Waterworks District No. 40  
v. Diamond Farming Co. Superior Court of  
California, County of Los Angeles, Case No. BC  
325201; Los Angeles County Waterworks District  
No. 40 v. Diamond Farming Co., Superior Court  
of California, County of Kern, Case No. S-1500-  
CV-234348; Wm. Bolthouse Farms, Inc. v. City  
of Lancaster Diamond Farming Co. v. City of  
Lancaster v. Palmdale Water District, Superior  
Court of California, County of Riverside,  
consolidated actions, Case Nos. RIC 353840,  
RIC 344436, RIC 344668

**ANSWER BY PALM RANCH  
IRRIGATION DISTRICT**

Cross defendant Palm Ranch Irrigation District (herein "Palm Ranch") answers the cross-complaint of Antelope Valley East Kern Water Agency ("AVEK") as follows:

1. Palm Ranch admits the allegations contained in paragraph 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 12, 13, 14, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 46, 47, 48 and 49 are true.

1           2.       In response to the allegations contained in paragraph 11 of the cross-complaint, Palm  
2 Ranch denies that Palm Ranch's pumping reduces basin water tables and contributes to the deficiency of  
3 the basin water supply as a whole and that this deficiency creates a public water shortage. Except as  
4 denied above, Palm Ranch admits the allegations contained in paragraph 11 are true.

5           3.       In response to the allegations contained in paragraph 15 of the cross-complaint, Palm  
6 Ranch denies that its continued and increasing extraction of basin water has resulted in or will result in the  
7 diminution, reduction or impairment of the basin's water supply and land subsidence.

8           4.       In response to the allegations contained in paragraph 16 of the cross-complaint, Palm  
9 Ranch denies that its continued and increasing extraction of basin water has and will deprive AVEK of its  
10 rights to provide water for public health, welfare and benefit.

11          5.       In response to the allegations contained in paragraph 17 of the cross-complaint, Palm  
12 Ranch denies that its methods of water use and storage are unreasonable or wasteful or violative of Article  
13 X, Section 2 of the California Constitution.

14          6.       In response to the allegations contained in paragraph 45 of the cross-complaint, Palm  
15 Ranch denies that Palm Ranch produces or threatens to produce more water from the basin than it has a  
16 right to produce or that this production interferes with the rights of AVEK.

17 DATED: October 3, 2006

LEMIEUX & O'NEILL

18 By: *Wayne K. Lemieux*

19 Wayne K. Lemieux, Attorneys for  
20 Palm Ranch Irrigation District