

1 WAYNE K. LEMIEUX (SBN 43501)  
2 W. KEITH LEMIEUX (SBN 161850)  
3 CHRISTINE CARSON (SBN. 188603)  
4 LEMIEUX & O'NEILL  
5 4165 E. Thousand Oaks Blvd., Suite 350  
6 Westlake Village, CA 91362  
7 Telephone: (805) 495-4770  
8 Facsimile: (805) 495-2787

9 Attorneys for

10 LITTLE ROCK CREEK IRRIGATION DISTRICT, PALM RANCH IRRIGATION DISTRICT,  
11 NORTH EDWARDS WATER DISTRICT, DESERT LAKE COMMUNITY SERVICES DISTRICT,  
12 LLANO DEL RIO WATER CO., LLANO MUTUAL WATER CO., BIG ROCK MUTUAL WATER  
13 CO.

14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
15 **IN AND FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

16 Coordinated Proceeding  
17 Special Title (Rule 1550(b))

18 ANTELOPE VALLEY GROUNDWATER  
19 CASES

20 Included Actions:

21 Los Angeles County Waterworks District No. 40  
22 v. Diamond Farming Co. Los Angeles County  
23 Superior Court Case No. BC 325201;

24 Los Angeles County Waterworks District No. 40  
25 v. Diamond Farming Co., Kern County Superior  
26 Court, Case No. S-1500-CV-234348;

27 Wm. Bolthouse Farms, Inc. v. City of Lancaster  
28 Diamond Farming Co. v. City of Lancaster v.  
29 Palmdale Water District, Riverside County  
30 Superior Court, Consolidated Actions, Case Nos.  
31 RIC 353840, RIC 344436, RIC 344668

32 AND RELATED CROSS-ACTIONS

Judicial Council Coordination No. 4408

Santa Clara Case No. 1-05-CV-049053  
Assigned to the Honorable Jack Komar – Dept. 12

**DECLARATION OF DOLLIE  
KOSTOPOULOS IN SUPPORT OF *EX PARTE*  
APPLICATION FOR AN ORDER  
MODIFYING THE ORDER RE: MOTION  
FOR AN ORDER AUTHORIZING COURT  
APPOINTED EXPERT WORK**

**DATE: June 27, 2013  
TIME: 9:00 a.m.  
DEPT: Telephonic Appearance**

1 I, DOLLIE KOSTOPOULOS, declare as follows:

2 1. I am the General Manager of Desert Lake Community Services District and North  
3 Edwards Water District, parties in this action. I have personal knowledge of the facts set forth herein, and  
4 if called to testify as to the facts stated herein, I could and would competently testify thereto.

5 2. The December 11, 2012 Order Re: Motion for An Order Authorizing Court-appointed  
6 Expert Work provides that all of the following public water suppliers from the largest to the smallest will  
7 pay the exact same amount for the court-appointed expert's bills: Rosamond Community Services  
8 District, Los Angeles County Waterworks District No. 40, Littlerock Creek Irrigation District, Palm  
9 Ranch Irrigation District, North Edwards Water District, Desert Lake Community Services District,  
10 California Water Service Company, Quartz Hill Water District, the Palmdale Water District, and Phelan  
11 Pinon Hills Community Services District.

12 3. The latest bill has each of such parties paying approximately \$711.36. This is a  
13 prohibitively large sum for small water districts such as Desert Lake Community Services District and  
14 North Edwards Water District. Additional bills from the expert are forthcoming shortly.

15 4. There is a great disparity in the number of acre feet of groundwater pumped by the largest  
16 PWS parties versus the smallest. For a small water district such as Desert Lake Community Services  
17 District or North Edwards Water District, with a small number of connections and rate-payers, to pay an  
18 equal share of the expert bills as Los Angeles Waterworks District 40 or Palmdale is a hardship.

19 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
20 true and correct.

21 Executed this 25<sup>th</sup> day of June, 2013 in North Edwards, California.

22  
23   
24 DOLLIE KOSTOPOULOS

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA, )  
3 ) ss.  
4 COUNTY OF VENTURA )

5 I am employed in the County of Ventura, State of California. I am over the age of 18 and not a  
6 party to the within action. My business address is 4165 E. Thousand Oaks Blvd., Suite 350, Westlake  
Village, California 91362.

7 On **June 25, 2013**, I posted the following document(s) to the website <http://www.scefilling.org>, a  
8 dedicated link to the Antelope Valley Groundwater Cases, and upon which the parties have agreed this  
posting constitutes service.

9 **DECLARATION OF DOLLIE KOSTOPOULOS IN SUPPORT OF *EX PARTE* APPLICATION**  
10 **FOR AN ORDER MODIFYING THE ORDER RE: MOTION FOR AN ORDER AUTHORIZING**  
11 **COURT APPOINTED EXPERT WORK**

12 By electronically serving through <http://www.scefilling.org>, and addressed to all parties appearing  
13 on the <http://www.scefilling.org> electronic service list, the file transmission was reported as complete and  
a copy of the <http://www.scefilling.org> Filing/Service Receipt will be maintained with a copy of the  
document in our office.

14 I am readily familiar with the business practice for collection and processing of pleadings and  
15 discovery for electronic service with <http://www.scefilling.org>, and that the pleadings and discovery shall  
be electronically served this same day in the ordinary course of business.

16 I declare under penalty of perjury under the laws of the State of California that the above is true  
17 and correct.

18 Executed on June 25, 2013, in Westlake Village, California.

19  
20   
21 Kathi Miers  
22  
23  
24  
25  
26  
27