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9 Attorneys for
10 LITTLEROCK 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.
Palmdale Water District, Riverside County
Superior Court, Consolidated Actions, Case Nos.
RIC 353840, RIC 344436, RIC 344668

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 MOTION
FOR AN ORDER MODIFYING THE ORDER
RE: MOTION FOR AN ORDER
AUTHORIZING COURT APPOINTED
EXPERT WORK

DATE: July 29, 2013
TIME: 9:00 a.m.
DEPT: TBD

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

12 3. Under such an interpretation of such order, the latest bill from the court appointed expert
13 would have each of such parties paying approximately \$711.36. This is a prohibitively large sum for
14 small water districts such as Desert Lake Community Services District and North Edwards Water District.

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 1st day of July, 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 **July 1, 2013**, I posted the following document(s) to the website <http://www.scefiling.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.scefiling.org>, and addressed to all parties appearing
13 on the <http://www.scefiling.org> electronic service list, the file transmission was reported as complete and
14 a copy of the <http://www.scefiling.org> Filing/Service Receipt will be maintained with a copy of the
document in our office.

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

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

19 Executed on July 1, 2013, in Westlake Village, California.

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21 
22 Kathi Miers
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