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Attorneys for Cross-complainants

LITTLEROCK CREEK IRRIGATION DISTRICT, PALM RANCH IRRIGATION DISTRICT, and  
Defendants NORTH EDWARDS WATER DISTRICT, DESERT LAKE COMMUNITY SERVICES  
DISTRICT, LLANO DEL RIO WATER CO., LLANO MUTUAL WATER CO., BIG ROCK MUTUAL  
WATER CO.

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**IN AND FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

Coordinated Proceeding  
Special Title (Rule 1550(b))

**Judicial Council Coordination No. 4408**

ANTELOPE VALLEY GROUNDWATER  
CASES

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

Included Actions:

**DECLARATION OF TRAVIS BERGLUND IN  
SUPPORT OF OPPOSITION TO WOOD  
CLASS' MOTION FOR AWARD OF  
ATTORNEYS' FEES, COSTS AND  
INCENTIVE AWARD**

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

Los Angeles County Waterworks District No. 40  
v. Diamond Farming Co., Kern County Superior  
Court, 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, Riverside County  
Superior Court, Consolidated Actions, Case Nos.  
RIC 353840, RIC 344436, RIC 344668

**DATE: April 1, 2016**  
**TIME: 1:30 p.m.**  
**DEPT: TBA**

AND RELATED CROSS-ACTIONS

1 I, TRAVIS BERGLUND, declare as follows:

2 1. I am the General Manager of LITTLE ROCK CREEK IRRIGATION DISTRICT (herein  
3 "District" or "LCID"), a public water purveyor. I am authorized to make this declaration on behalf of the  
4 District. I have worked for the District, a public agency, since January 16, 1997.

5 2. I have personal knowledge of the facts set forth herein, and if called to testify, I could and  
6 would competently testify thereto. As General Manager and a long-time employee of the District, I am  
7 familiar with the practices and management of the District, including but not limited to the record-keeping  
8 practices of District, the number of connections, type of water use by customers (for example, domestic,  
9 irrigation or commercial), the District budget and amount in reserve, and the amount expended by the  
10 District on attorneys' fees.

11 3. There are currently 1,255 connections that receive water service from the District. Of these,  
12 approximately 1,026 are households with the remainder being commercial or irrigation use. The District  
13 has an annual operating budget of \$1,741,003 but only has income of \$1,542,686. The District has  
14 \$2,218,988.42 in reserve for fiscal year 2014-2015. The District has only 6 employees.

15 4. Throughout the 15 years of this litigation, LCID spent a total of \$435,459.72 in attorneys'  
16 fees. They were billed at billing rates from between \$170 through \$400 per hour, the average being \$291  
17 per hour. LCID did not have the financial means to pay for legal fees at a higher rate. If the amount paid  
18 as legal fees is broken down by connection, each customer of LCID has already paid approximately  
19 \$346.98 in defending this litigation. In addition, LCID expects it will continue to incur legal fees as it  
20 defends this matter through appeal, as well as in connection with the formation and operation of the  
21 Watermaster.

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5. As a public agency, the District cannot operate at a profit but is permitted to have a reserve fund. If the amount requested by the Wood Class were awarded against the District, this would greatly exceed the operating budget and reserve fund, and therefore, the District would have insufficient funds to continue to operate and provide water to the community.

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

Executed this 14th day of March, 2016 in Littlerock Creek, California.

Travis Berglund  
TRAVIS BERGLUND, Declarant

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

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

7 On **March 14, 2016**, 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  
9 posting constitutes service.

10 **DECLARATION OF TRAVIS BERGLUND IN SUPPORT OF OPPOSITION TO WOOD CLASS'**  
11 **MOTION FOR AWARD OF ATTORNEYS' FEES, COSTS AND INCENTIVE AWARD**

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  
15 document in our office.

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

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

21 Executed on March 14, 2016, in Westlake Village, California.

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Kathi Miers