

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

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., QUARTZ HILL WATER DISTRICT

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

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

Coordinated Proceeding  
Special Title (Rule 1550(b))

ANTELOPE VALLEY GROUNDWATER  
CASES

Included Actions:

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

AND RELATED CROSS-ACTIONS

**Judicial Council Coordination No. 4408**

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

**NOTICE OF ERRATA TO DECLARATION  
OF W. KEITH LEMIEUX IN SUPPORT OF  
OPPOSITION TO WOOD CLASS' MOTION  
FOR AWARD OF ATTORNEYS' FEES,  
COSTS AND INCENTIVE AWARD AND IN  
SUPPORT OF JOINDER IN LOS ANGELES  
COUNTY WATERWORKS DISTRICT NO.  
40'S OPPOSITION TO WOOD CLASS'  
MOTION**

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

1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 LITTLEROCK CREEK IRRIGATION DISTRICT, PALM RANCH IRRIGATION DISTRICT,  
3 NORTH EDWARDS WATER DISTRICT, DESERT LAKE COMMUNITY SERVICES DISTRICT, and  
4 QUARTZ HILL WATER DISTRICT file this errata to the Declaration of W. Keith Lemieux in Support  
5 of Opposition to Wood Class' Motion for Attorneys' Fees, Costs and Incentive Award and in Support of  
6 Joinder in District No. 40's Opposition to Wood Class' Motion ("Declaration").  
7

8 Due to inadvertent typographical error, the line below paragraph 4 was omitted from the  
9 Declaration of W. Keith Lemieux. Accordingly, a corrected signed signature page for such Declaration is  
10 attached hereto as Exhibit A.

11 DATED: March 14, 2016

LEMIEUX & O'NEILL

12 By:  \_\_\_\_\_

13 CHRISTINE CARSON

14 Attorneys for Littlerock Creek Irrigation District, Palm  
15 Ranch Irrigation District, Quartz Hill Water District, North  
16 Edwards Water District, Desert Lake Community Services  
17 District  
18  
19  
20  
21  
22  
23  
24  
25

1 I, KEITH LEMIEUX, declare as follows:

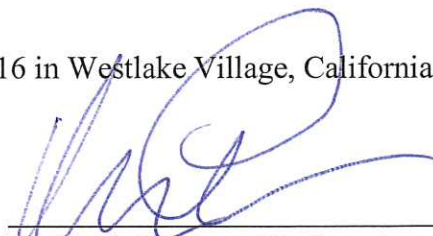
2 1. I am an attorney at law, licensed to practice before this and all courts of the State of  
3 California. I am a partner with Lemieux & O'Neill, counsel of record in this case for LITTLEROCK  
4 CREEK IRRIGATION DISTRICT, PALM RANCH IRRIGATION DISTRICT, NORTH EDWARDS  
5 WATER DISTRICT, DESERT LAKE COMMUNITY SERVICES DISTRICT, LLANO DEL RIO  
6 WATER CO., LLANO MUTUAL WATER CO., and BIG ROCK MUTUAL WATER CO. Together  
7 with these papers I am submitting a substitution of attorney substituting myself in as counsel in this case  
8 for QUARTZ HILL WATER DISTRICT. I have personal knowledge of the facts set forth herein, and if  
9 called to testify, I could and would competently testify thereto.

10 3. Attached hereto as Exhibit A is a true and correct copy of exhibit 3 to the Physical Solution,  
11 setting forth the allocation for each public water supplier.

12 4. Attached hereto as Exhibit B is a true and correct copy of the revised [proposed] Judgment  
13 approving the Wood Class Action Partial Settlement posted by attorney McLachlan.

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

16 Executed this 14th day of March, 2016 in Westlake Village, California.

17  
18   
19 \_\_\_\_\_  
W. Keith Lemieux, 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 15, 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 **NOTICE OF ERRATA TO DECLARATION OF W KEITH LEMIEUX IN SUPPORT OF  
11 OPPOSITION TO WOOD CLASS' MOTION FOR AWARD OF ATTORNEYS' FEES, COSTS  
12 AND INCENTIVE AWARD; JOINDER IN LOS ANGELES COUNTY WATERWORKS  
13 DISTRICT NO. 40'S OPPOSITION TO WOOD CLASS' MOTION**

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

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

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

23 Executed on March 15, 2016, in Westlake Village, California.

24   
25 Kathi Miers