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SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

Coordination Proceeding
Special Title (Rule 1550(b))

Judicial Council Coordination Proceeding No.
4408

**ANTELOPE VALLEY GROUNDWATER
CASES**

ASSIGNED FOR ALL PURPOSES TO:
Judge: Honorable Jack Komar

Included Actions:

Los Angeles County Waterworks District No.
40 v. Diamond Farming Co. 1; Los Angeles
County Waterworks District No. 40 v.
Diamond Farming Co.; Wm. Bolthouse
Farms, Inc. v. City of Lancaster; Diamond
Farming Co. v. City of Lancaster; Diamond
Farming Co. v. Palmdale Water Dist.

**REPLY TO WATERWORKS'
OPPOSITION TO COUNTY
SANITATION DISTRICTS' PETITION
FOR LEAVE TO INTERVENE**

General Civil Case
Date: December 2, 2005
Time: 10:00 a.m.
Dept.: 1, Room, 534

COUNTY SANITATION DISTRICTS NOS.
14 AND 20 OF LOS ANGELES COUNTY,
public agencies,

Petitioners and Intervenor

vs.

LOS ANGELES COUNTY WATERWORKS
DISTRICT NO. 40,

Plaintiff and Respondent,

And

1 DIAMOND FARMING COMPANY;
2 WM. BOLTHOUSE FARMS, INC.;
3 BOLTHOUSE PROPERTIES, INC.;
4 CALIFORNIA WATER SERVICE
5 COMPANY; CITY OF LANCASTER;
6 CITY OF LOS ANGELES; CITY OF
7 PALMDALE; LITTLEROCK CREEK
8 IRRIGATION DISTRICT; PALMDALE
9 WATER DISTRICT; PALM RANCH
10 IRRIGATION DISTRICT; QUARTZ HILL
11 WATER DISTRICT; EDWARDS AIR
12 FORCE BASE, CALIFORNIA; UNITED
13 STATED DEPARTMENT OF THE AIR
14 FORCE; And DOES 1 through 25,000
15 inclusive,

16 Defendants and Respondents.

17 Los Angeles County Waterworks District No. 40 opposes the Petition for Leave to
18 Intervene of County Sanitation Districts Nos. 14 and 20 of Los Angeles County (“Districts”)
19 because Waterworks recently amended its complaint to add the Districts as defendants.
20 Waterworks claims that the Districts are now parties to the action and cannot intervene.
21 However, Waterworks’ premise for opposition is incorrect because the Districts are not yet
22 parties to this action, and District No. 14 still has not been served with Waterworks’ complaint.
23 Waterworks’ amendment to include the Districts as defendants affirms the Districts’ position that
24 they have an interest in the subject matter of this litigation and are entitled to intervene pursuant
25 to Code of Civil Procedure section 387. The Districts respectfully request this Court to grant
26 their Petition for Leave to Intervene.

27 Dated: November 23, 2005

ELLISON, SCHNEIDER & HARRIS L.L.P.

28 By: _____
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PROOF OF SERVICE

I declare that:

I am employed in the County of Sacramento, State of California. I am over the age of eighteen years and am not a party to the within action. My business address is ELLISON, SCHNEIDER & HARRIS, L.L.P.; 2015 H Street; Sacramento, California 95814-3109; telephone (916) 447-2166.

On November 23, 2005, I served the attached *Reply to Waterworks' Opposition To County Sanitation Districts' Petition For Leave To Intervene in: Antelope Valley Groundwater Cases, Judicial Council Coordinating Proceeding No. 4408*, by putting a true copy thereof in a sealed envelope, with postage thereon fully prepaid, in the United States Mail at Sacramento, California, addressed to each person shown on the attached service list.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on November 23, 2005, at Sacramento, California.

Deric Wittenborn

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