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Attorneys for Defendant and Cross-Complainant  
Tejon Ranchcorp

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES

**ANTELOPE VALLEY  
GROUNDWATER CASES**

Included Actions:

Los Angeles County Waterworks District No. 40 v.  
Diamond Farming Co., Superior Court of California,  
County of Los Angeles, Case No. BC 325 201; Los  
Angeles County Waterworks District No. 40 v.  
Diamond Farming Co., Superior Court of California,  
County of Kern, Case No. S-1500-CV-254-348;  
Wm. Bolthouse Farms, Inc. v. City of Lancaster,  
Diamond Farming Co. v. City of Lancaster, Diamond  
Farming Co. v. Palmdale Water Dist., Superior Court  
of California, County of Riverside, Case Nos. RIC  
353840, RIC 344436, RIC 344668

TEJON RANCHCORP,

Cross-Complainant,

v.

LOS ANGELES COUNTY WATERWORKS  
DISTRICT NO. 40; ROSAMOND COMMUNITY  
SERVICES DISTRICT; PALMDALE WATER  
DISTRICT; CITY OF LANCASTER; CITY OF  
PALMDALE; LITTLE ROCK CREEK  
IRRIGATION DISTRICT; PALM RANCH  
IRRIGATION DISTRICT; QUARTZ HILL  
WATER DISTRICT; CALIFORNIA WATER  
SERVICE COMPANY; SANITATION DISTRICTS  
NOS. 14 AND 20 OF LOS ANGELES COUNTY;  
ANTELOPE VALLEY-EAST KERN WATER  
AGENCY; and DOES 1 through 100,

Cross-Defendants.

) Judicial Council Coordination Proceeding No.  
) 4408

) Assigned to The Honorable Jack Komar

**AMENDMENT TO CROSS-COMPLAINT  
OF TEJON RANCHCORP**

1 Tejon Ranchcorp previously filed a Cross-Complaint dated November 23, 2005 in these  
2 coordinated cases. Tejon Ranchcorp realleges and incorporates herein by reference all of the allegations  
3 of its Cross-Complaint dated November 23, 2005. Thereafter, additional parties filed cross-complaints  
4 against Tejon Ranchcorp. Now, therefore, Tejon Ranchcorp amends its cross-complaint as follows:  
5 Tejon Ranchcorp cross-complains against the following additional cross-defendants: Palmdale Water  
6 District, City of Lancaster, City of Palmdale, Little Rock Creek Irrigation District, Palm Ranch  
7 Irrigation District, Quartz Hill Water District, California Water Service Company, Sanitation Districts  
8 Nos. 14 and 20 of Los Angeles County, Antelope Valley-East Kern Water Agency, and any other cross-  
9 complainant that now or hereafter cross-complaints against Tejon Ranchcorp.


10 **PRAYER FOR RELIEF**

11 Wherefore, Cross-Complainant Tejon Ranchcorp prays for judgment as follows:

- 12 1. For an order or judgment that separately manages and separately adjudicates  
13 water rights in the western sub-basins apart from the remainder of the Antelope Valley Groundwater  
14 Basin;
- 15 2. For a declaration in accordance with paragraph 19 of Tejon Ranchcorp's Cross-  
16 Complaint, including a declaration of the priority and character of Tejon Ranchcorp's rights to pump,  
17 use, and store native groundwater and imported water on and beneath its property;
- 18 3. For a preliminary and permanent injunction prohibiting Cross-Defendants from  
19 pumping, using, storing, wasting, or failing to conserve groundwater in any manner which interferes  
20 with the rights of Cross-Complainant Tejon Ranchcorp or violates Article X, Section 2 of the California  
21 Constitution;
- 22 4. For imposition of a physical solution as described in paragraph 21 of Tejon  
23 Ranchcorp's Cross-Complaint.
- 24 5. For prejudgment interest.
- 25 6. For attorneys' fees, expert witness fees, and costs incurred in these coordinated  
26 actions; and
- 27 7. For such other and further monetary, equitable, or other relief as the Court deems  
28 just and proper.

1 Dated: February 9, 2007

2 NOSSAMAN, GUTHNER, KNOX & ELLIOTT, LLP  
3 FREDRIC A. FUDACZ  
4 HENRY S. WEINSTOCK

5 By:   
6 HENRY S. WEINSTOCK  
7 Attorneys for Tejon Ranchcorp  
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1 **PROOF OF SERVICE**

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3 The undersigned declares:

4 I am employed in the County of , State of California. I am over the age of 18 and am not a party  
5 to the within action; my business address is c/o Nossaman, Guthner, Knox & Elliott, LLP, 445 S.  
6 Figueroa Street, 31st Floor Los Angeles, California 90071-1602.

7 On **February 9, 2007**, I served the foregoing **AMENDMENT TO CROSS-COMPLAINT OF**  
8 **TEJON RANCHCORP** on all interested parties:

9 (X) (By U.S. Mail) On the same date, at my said place of business, said correspondence was sealed  
10 and placed for collection and mailing following the usual business practice of my said employer.  
11 I am readily familiar with my said employer's business practice for collection and processing of  
12 correspondence for mailing with the United States Postal Service, and, pursuant to that practice,  
13 the correspondence would be deposited with the United States Postal Service, with postage  
14 thereon fully prepaid, on the same date at Los Angeles, California, addressed to:

15 Honorable Jack Komar  
16 Judge of the Superior Court of California  
17 County of Santa Clara  
18 191 North First Street, Department 17C  
19 San Jose, CA 95113

20 (X) (By E-Filing) I posted the document(s) listed above to the Santa Clara County Superior Court  
21 website in regard to the Antelope Valley Groundwater matter in compliance with the Court's  
22 electronic posting instructions and the Court's Clarification Order dated October 27, 2005.

23 ( ) (By Overnight Express) I served a true and correct copy by Overnight Express, for delivery on the  
24 next business day. Each copy was enclosed in an envelope or package designated by the express  
25 service carrier; deposited in a facility regularly maintained by the express service carrier or  
26 delivered to a courier or driver authorized to receive documents on its behalf; with delivery fees  
27 paid or provided for; addressed as shown on the service list.

28 Executed on **February 9, 2007** at Los Angeles, California.

(X) (STATE) I declare under penalty of perjury under the laws of the State of California that the  
foregoing is true and correct.

( ) (FEDERAL) I declare under penalty of perjury under the laws of the United States of America  
that the foregoing is true and correct.

\_\_\_\_\_  
Mitchi Shibata