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6 Attorneys for Cross-Defendant
7 SGS ANTELOPE VALLEY
DEVELOPMENT, LLC

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF LOS ANGELES**

11 ANTELOPE VALLEY
12 GROUNDWATER CASES

13 INCLUDED ACTIONS:

14 LOS ANGELES COUNTY
WATERWORKS DISTRICT NO. 40 v.
15 DIAMOND FARMING COMPANY, et
al., Los Angeles Superior Court Case No.
16 BC325201;

17 LOS ANGELES COUNTY
WATERWORKS DISTRICT NO. 40 v.
18 DIAMOND FARMING COMPANY, et
al., Kern County Superior Court Case
19 No. S-1500-CV-254-348;

20 DIAMOND FARMING COMPANY,
and W.M. BOLTHOUSE FARMS, INC.,
21 v. CITY OF LANCASTER, et al.,
Riverside Superior Court Case No. RIC
22 344436 [c/w case no. RIC 344668 and
355840]

Judicial Council Coordination No. 4408
Case No. 1-05-CV-049053
Assigned to The Honorable Jack Komar

**CROSS-DEFENDANT SGS ANTELOPE
VALLEY DEVELOPMENT, LLC'S AMENDED
DISCLOSURE OF EXHIBITS REGARDING
PROVE-UP TRIAL RE: [PROPOSED]
STIPULATED JUDGMENT AND PHYSICAL
SOLUTION**

DATE: September 28, 2015
TIME: 10:00 a.m.
DEPT: TBA

1 **TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE** that in accordance with Court's Second Case Management
3 Order dated March 27, 2015, Cross Defendant SGS Antelope Valley Development, LLC ("SGS
4 Antelope") hereby amends the exhibit labels it will apply to the exhibits designated on April 27,
5 2015 by SGS Antelope to correspond with exhibits designated in the Court's May 29, 2013
6 Minute Order admitting certain exhibits into evidence during the Phase 4 proceedings.

7

8 New Exhibit No.	Prior Exhibit 9 No.	Description	In Evidence
10 4-SGSANTELOPEVALLEY-1	4-SUNPOWER-2	11 Stipulation 12 Concerning Land 13 Ownership and 14 Prior Groundwater Production	
15 4-SGSANTELOPEVALLEY-2	4-SUNPOWER-1	16 Response to 17 December 12, 2012 18 Discovery Order for Phase 4 Trial	

19

20 SGS Antelope hereby withdraws the exhibit designated as 4-SUNPOWER-3 in its April
21 27, 2014 designation. In addition to the exhibits listed above, SGS Antelope reserves the right to
22 further supplement or add to this list of exhibits, if necessary.

23 DATED: September 4, 2015

EDWARD J. CASEY
ANDREW BRADY
ALSTON & BIRD LLP

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Andrew Brady
Attorneys for Cross-Defendant
SGS ANTELOPE VALLEY
DEVELOPMENT, LLC

4-SGSANTELOPEVALLEY-1

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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
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22 344436 [c/w case no. RIC 344668 and
23 355840]
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Judicial Council Coordination No. 4408

**SGS ANTELOPE VALLEY DEVELOPMENT
LLC'S APPLICATION FOR APPROVAL OF
STIPULATION CONCERNING LAND
OWNERSHIP AND PRIOR GROUNDWATER
PRODUCTION; [PROPOSED] ORDER**

Case No. 1-05-CV-049053

Assigned to The Honorable Jack Komar

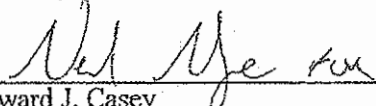
Trial Date: May 28, 2013

Time: 9:00 a.m.

1 Pursuant to the Court's March 1, 2013 Minute Order, SGS Antelope Valley
2 Development, LLC submits this Application for Approval of Stipulation Concerning Land
3 Ownership and Prior Groundwater Production. The proposed Stipulation is attached to this
4 application.

5
6 DATED: April 30, 2013

EDWARD J. CASEY
NEAL MAGUIRE
ALSTON & BIRD LLP

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9 _____
10 Edward J. Casey
11 Attorneys for Cross-Defendant
12 SGS ANTELOPE VALLEY DEVELOPMENT,
13 LLC
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1 Los Angeles County Waterworks District No. 40, Quartz Hill Water District, Littlerock
2 Creek Irrigation District, Palm Ranch Irrigation District, Palmdale Water District, the City of
3 Palmdale, the City of Lancaster, and Rosamond Community Services District (the "PWAs") and
4 SGS Antelope Valley Development LLC ("Landowner") (collectively, the "Stipulating Parties")
5 enter into this Stipulation Between Certain Public Water Agencies And Landowner Concerning
6 Land Ownership, Prior Groundwater Production And Proposed Allocation Of Groundwater
7 Rights; And Order Thereon ("Stipulation") through their respective counsel of record. This
8 Stipulation is based on the matters set forth in Section I, below.

9 I.

10 RECITALS

11 A. Landowner owns land overlying the Antelope Valley Groundwater Basin (the
12 "AV Basin"). (For purposes of this Stipulation, the term "AV Basin" shall mean the Antelope
13 Valley Groundwater Basin as determined and defined by the Honorable Jack Komar in his
14 March 12, 2007 Revised Order After Hearing on Jurisdictional Boundaries.)

15 B. Landowner served its Response To December 12, 2012 Discovery Order for
16 Phase 4 Trial and the Non-Expert Witness Designation ("Discovery Response") on all parties in
17 the instant action.

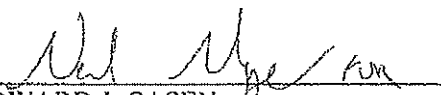
18 II.

19 TERMS OF THE STIPULATION

20 A. Based on the Landowner's Discovery Response, the PWAs have no objection to
21 the Court making the following findings of fact: Landowner currently owns approximately land
22 overlying the AV Basin, which land is comprised of Assessor Parcel Nos. ("APN") identified in
23 Exhibit A to this Stipulation.

24 April 30, 2013

ALSTON & BIRD, LLP

26
27 By: 
EDWARD J. CASEY
28 Attorneys for SGS Antelope Valley Development, LLC

1 April 24, 2013

BEST BEST & KRIEGER LLP

2
3 By: Jeffrey V. Dunn
4 JEFFREY V. DUNN
5 Attorneys for Los Angeles County Waterworks District No. 40

6 April _____, 2013

CHARLTON WEEKS LLP

7
8 By: _____
9 BRADLEY T. WEEKS
Attorneys for Quartz Hill Water District

10 April _____, 2013

LEMIEUX & O'NEILL

11
12 By: _____
13 WAYNE K. LEMIEUX
14 Attorneys for Littlerock Creek Irrigation District and Palm Ranch
Irrigation District

15 April _____, 2013

LAGERLOF, SENECAL, GOSNEY & KRUSE

16
17 By: _____
18 THOMAS BUNN III
Attorneys for Palmdale Water District

19 April _____, 2013

RICHARDS, WATSON & GERSHON

20
21 By: _____
22 STEVEN R. ORR
23 Attorneys for City of Palmdale

24 April _____, 2013

MURPHY & EVERTZ LLP

25
26 By: _____
27 DOUGLAS J. EVERTZ
Attorneys for City of Lancaster and Rosamond Community Services
28 District

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April _____, 2013

BEST BEST & KRIEGER LLP

By: _____
JEFFREY V. DUNN
Attorneys for Los Angeles County Waterworks District No. 40

April _____, 2013

CHARLTON WEEKS LLP

By: _____
BRADLEY T. WEEKS
Attorneys for Quartz Hill Water District

April _____, 2013

LEMIEUX & O'NEILL

By: _____
WAYNE K. LEMIEUX
Attorneys for Littlerock Creek Irrigation District and Palm Ranch
Irrigation District

April _____, 2013

LAGERLOF, SENEAL, GOSNEY & KRUSE

By: _____
THOMAS BUNN III
Attorneys for Palmdale Water District

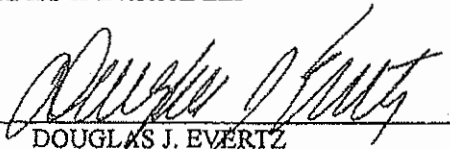
April _____, 2013

RICHARDS, WATSON & GERSHON

By: _____
STEVEN R. ORR
Attorneys for City of Palmdale

April 30, 2013

MURPHY & EVERTZ LLP

By: 
DOUGLAS J. EVERTZ
Attorneys for City of Lancaster and Rosamond Community Services
District

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EXHIBIT A

SGS Antelope Valley Development, LLC owns, occupies, or otherwise controls property

identified by the following Assessor Parcel Number(s):

359-121-02-00-3
359-121-03-00-6
359-121-04-00-9
359-121-05-00-2
359-121-11-00-9
359-121-13-00-5
359-121-17-00-7
359-121-19-00-3
359-121-20-00-5
359-121-24-00-7
359-121-40-00-3
359-121-41-00-6
359-121-45-00-8
359-121-46-00-1
359-121-47-00-4
359-121-48-00-7
359-121-49-00-0
359-121-50-00-2
359-350-20-00-5
359-121-14-00-8
359-121-21-00-8
359-121-22-00-1
359-121-23-00-4
359-121-39-00-1
359-121-42-00-9
359-121-43-00-2
359-020-07-00-2
359-110-04-00-9
359-110-07-00-8
359-110-08-00-1
359-110-09
359-110-12-00-2
359-110-13-00-5
359-110-14-00-8
359-110-15-00-1
359-110-16-00-4
359-110-17-00
359-110-19-00-3
359-110-20-00-5
359-110-21-00-8
359-110-22
359-350-19
359-162-11-00-8.

1 PROPOSED ORDER

2 On May 1, 2013, SGS Antelope Valley Development, LLC filed its Application for
3 Approval of Stipulation Concerning Land Ownership and Prior Groundwater Production (the
4 "Application"). Having read and considered all papers filed in connection with the Stipulation
5 attached to the Application, and having received no objections thereto,

6 **IT IS HEREBY ORDERED THAT:** the facts set forth in Section II of the Stipulation
7 are deemed admitted.

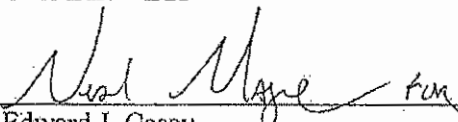
8
9 **IT IS SO ORDERED.**

10
11 DATED: _____

Honorable Jack Komar
Judge of the Santa Clara County Superior
Court

12
13
14 Respectfully submitted by:

15 EDWARD J. Casey
16 NEAL MAGUIRE
17 ALSTON & BIRD LLP

18 
19 Edward J. Casey

20 Attorneys for Cross-Defendant
21 SGS Antelope Valley Development, LLC
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PROOF OF SERVICE

I, Yolanda S. Ramos, declare:

I am employed in the County of Los Angeles, State of California. My business address is Alston & Bird LLP, 333 South Hope Street, Sixteenth Floor, Los Angeles, CA 90071. I am over the age of eighteen years and not a party to the action in which this service is made.

On May 1, 2013, I served the document(s) described as SGS ANTELOPE VALLEY DEVELOPMENT, LLC'S APPLICATION FOR APPROVAL OF STIPULATION CONCERNING LAND OWNERSHIP AND PRIOR GROUNDWATER PRODUCTION; [PROPOSED] ORDER on the interested parties in this action by enclosing the document(s) in a sealed envelope addressed as follows:

☐ BY MAIL: I am "readily familiar" with this firm's practice for the collection and the processing of correspondence for mailing with the United States Postal Service. In the ordinary course of business, the correspondence would be deposited with the United States Postal Service at 333 South Hope Street, Los Angeles, California 90071 with postage thereon fully prepaid the same day on which the correspondence was placed for collection and mailing at the firm. Following ordinary business practices, I placed for collection and mailing with the United States Postal Service such envelope at Alston & Bird LLP, 333 South Hope Street, Los Angeles, California 90071.

☒ BY ELECTRONIC MAIL: By posting the document listed above to the Santa Clara Superior Court website: www.sccfiling.org regarding the ANTELOPE VALLEY GROUNDWATER matter.

☐ BY FEDERAL EXPRESS ☐ UPS NEXT DAY AIR ☐ OVERNIGHT DELIVERY: I deposited such envelope in a facility regularly maintained by ☐ FEDERAL EXPRESS ☐ UPS ☐ Overnight Delivery [specify name of service:] with delivery fees fully provided for or delivered the envelope to a courier or driver of ☐ FEDERAL EXPRESS ☐ UPS ☐ OVERNIGHT DELIVERY [specify name of service:] authorized to receive documents at Alston & Bird LLP, 333 South Hope Street, Los Angeles, California 90071 with delivery fees fully provided for.

☐ BY FACSIMILE: I telecopied a copy of said document(s) to the following addressee(s) at the following number(s) in accordance with the written confirmation of counsel in this action.

☒ [State] I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

☐ [Federal] I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 1, 2013, at Los Angeles, California.


YOLANDA S. RAMOS

4-SGSANTELOPEVALLEY-2

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Neal Maguire (SBN 234531)
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6 Attorneys for Cross-Defendant SGS
Antelope Valley Development LLC
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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF LOS ANGELES**
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11 ANTELOPE VALLEY
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v. CITY OF LANCASTER, et al.,
21 Riverside Superior Court Case No. RIC
22 344436 [c/w case no. RIC 344668 and
355840]

Judicial Council Coordination No. 4408

**RESPONSE TO DECEMBER 12, 2012
DISCOVERY ORDER FOR PHASE 4 TRIAL**

Case No. 1-05-CV-049053
Assigned to The Honorable Jack Komar

Trial Date: February 11, 2013
Time: 9:00 a.m.

1 Cross-Defendant SGS Antelope Valley Development LLC, a subsidiary of Sempra
2 Energy, responds to the Court's December 12, 2012 Discovery Order for Phase 4 Trial
3 ("Discovery Order") as follows.

4 **I. Reservation of Rights**

5 SGS Antelope Valley Development LLC ("SGS") objects to the Discovery Order's
6 abbreviated discovery period. Until the December 11, 2012, case management conference before
7 the Court, there was no determination as to the scope of the Phase 4 trial. Prior to the December
8 11th case management conference, parties submitted various proposals regarding the scope of
9 the Phase 4 trial, some of which proposed a trial on discrete issues such as return flows or
10 prescription and would not have included a "prove-up" of parties' water rights claims. While
11 SGS hereby responds in accordance with its utmost ability based on its prior review of its water
12 rights claim and the basis for that claim, SGS reserves the right to supplement this response as
13 additional information becomes available.

14 **II. Response to Section I.1 of the Discovery Order**

15 A. SGS owns, occupies, or otherwise controls approximately 1,368.42 acres of land
16 in Kern County identified by the following Assessor Identification Numbers:

17 APN:

18 359-121-02-00-3
19 359-121-03-00-6
20 359-121-04-00-9
21 359-121-05-00-2
22 359-121-11-00-9
23 359-121-13-00-5
24 359-121-17-00-7
25 359-121-19-00-3
26 359-121-20-00-5
27 359-121-24-00-7
28 359-121-40-00-3
359-121-41-00-6
359-121-45-00-8
359-121-46-00-1
359-121-47-00-4
359-121-48-00-7
359-121-49-00-0
359-121-50-00-2
359-350-20-00-5

1 359-121-14-00-8
2 359-121-21-00-8
3 359-121-22-00-1
4 359-121-23-00-4
5 359-121-39-00-1
6 359-121-42-00-9
7 359-121-43-00-2
8 359-020-07-00-2
9 359-110-04-00-9
10 359-110-07-00-8
11 359-110-08-00-1
12 359-110-09
13 359-110-12-00-2
14 359-110-13-00-5
15 359-110-14-00-8
16 359-110-15-00-1
17 359-110-16-00-4
18 359-110-17-00
19 359-110-19-00-3
20 359-110-20-00-5
21 359-110-21-00-8
22 359-110-22
23 359-350-19
24 359-162-11-00-8

25 (the "SGS Property").

26 B. SGS became the record title owner for the parcels comprising the SGS Property
27 during the period from 2009 to 2012. SGS purchased approximately 980 acres of the SGS
28 Property from the heirs of Hashem Naraghi. SGS is informed that Mr. Naraghi owned that
property from at least 1999 until he died.

29 C. SGS is informed that up to five groundwater wells remain on the SGS Property
30 and existed from 2000-04.

31 D. SGS is informed that up to five groundwater wells were operated on the SGS
32 Property from 2000-04.

33 E. SGS is informed that (i) groundwater was produced during the period from 1999-
34 2004 for agricultural irrigation of primarily carrots and some onions, (ii) per a lease, Diamond
35 Farms farmed in at least 1999 approximately 235 acres of the SGS Property, and (iii) Robert
36 Guetzlaff, an individual hired as a caretaker by Mr. Naraghi, farmed thereafter approximately 40
37
38

1 acres of land on the SGS Property. Utilizing a multiplier of 4.89 acre feet of water per acre of
2 land farmed for onions and a multiplier of 3.0 acre feet of water per acre of land farmed for
3 carrots, SGS estimates, based on information currently and reasonably available to it, that the
4 amount of water pumped from the well(s) described above in Section II.C-D is:

5	Year	AFY
6	2000	132
7	2001	132
8	2002	132
9	2003	132
10	2004	132
11	2011	n/a
12	2012	n/a

13 F. The water described above in Section II.E was utilized for agricultural irrigation
14 and domestic use.

15 G. SGS does not produce groundwater off-site.

16 H. The SGS Property was not used for any business or domestic purposes in 2011
17 and 2012. SGS plans to construct and operate a solar photovoltaic electrical power generation
18 facility with a capacity of up to 300 megawatts.

19 I. The SGS Property is not currently utilized for agriculture.

20 J. In addition to rights associated with past and current pumping, SGS reserves its
21 right to assert its "unexercised overlying rights" associated with prospective overlying uses that
22 are reasonable and beneficial. As held in *City of Los Angeles v. City of San Fernando* (1975) 14
23 Cal.3d 199, 293, fn. 100, "prescriptive rights would not necessarily impair the private
24 defendants' rights to ground water for new overlying uses for which the need had not yet come
25 into existence during the prescriptive period." (See also *City of Barstow v. Mojave Water Agency*
26 (2000) 23 Cal.4th 1224, 1247-49; 1-11 California Water Law and Policy § 11.12 [Bender 2011].)

27 K. SGS claims 132 aft as the reasonable and beneficial use for its property plus any
28 amount required pursuant to Section II.J above.

1 **III. Response to Section I.2 of the Discovery Order**

2 **A.** SGS does not lease the SGS Property.

3 **IV. Response to Section I.3 of the Discovery Order**

4 **A.** SGS can make available grant deeds confirming its ownership of the SGS
5 Property. In addition, SGS identifies the following documents relating to the facts set forth
6 above: (i) a pesticide permit issued to Diamond Farms dated as of May 1999, (ii) a report dated
7 December 2009 from Rottman Drilling Co. entitled "Report for 5 Wells at Kelly Ranch,
8 Rosamond, CA"; (iii) a document dated August 2011 and entitled "Geocheck Physical Setting
9 Source Map Findings"; (iv) photographs of Mr. Guetzlaff's operations; and (v) a Memorandum
10 of Water Service Agreement dated as of February 1999 between Mr. Naraghi and the Antelope
11 Valley-East Kern Water Agency.

12 **B.** See Section IV.A above.

13 **V. Response to Section V of the Discovery Order**

14 Josh Teigiser is the SGS representative most qualified to testify to the above facts.

15
16 Dated: December 21, 2012

ALSTON & BIRD LLP

17
18 By: 

NEAL P. MAGUIRE

Attorneys for Cross-Defendant SGS Antelope Valley
Development LLC

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PROOF OF SERVICE

I, Yolanda S. Ramos, declare:

I am employed in the County of Los Angeles, State of California. My business address is Alston & Bird LLP, 333 South Hope Street, Sixteenth Floor, Los Angeles, CA 90071. I am over the age of eighteen years and not a party to the action in which this service is made.

On December 21, 2012, I served the document(s) described as **RESPONSE TO DECEMBER 12, 2012 DISCOVERY ORDER FOR PHASE 4 TRIAL** on the interested parties in this action as follows:

☐ BY MAIL: I am "readily familiar" with this firm's practice for the collection and the processing of correspondence for mailing with the United States Postal Service. In the ordinary course of business, the correspondence would be deposited with the United States Postal Service at 333 South Hope Street, Los Angeles, California 90071 with postage thereon fully prepaid the same day on which the correspondence was placed for collection and mailing at the firm. Following ordinary business practices, I placed for collection and mailing with the United States Postal Service such envelope at Alston & Bird LLP, 333 South Hope Street, Los Angeles, California 90071.

☒ BY ELECTRONIC MAIL: By posting the document listed above to the Santa Clara Superior Court website: www.sccfiling.org regarding the ANTELOPE VALLEY GROUNDWATER matter.

☐ BY FEDERAL EXPRESS ☐ UPS NEXT DAY AIR ☐ OVERNIGHT DELIVERY: I deposited such envelope in a facility regularly maintained by ☐ FEDERAL EXPRESS ☐ UPS ☐ Overnight Delivery [specify name of service:] with delivery fees fully provided for or delivered the envelope to a courier or driver of ☐ FEDERAL EXPRESS ☐ UPS ☐ OVERNIGHT DELIVERY [specify name of service:] authorized to receive documents at Alston & Bird LLP, 333 South Hope Street, Los Angeles, California 90071 with delivery fees fully provided for.

☐ BY FACSIMILE: I telecopied a copy of said document(s) to the following addressee(s) at the following number(s) in accordance with the written confirmation of counsel in this action.

☒ [State] I declare under penalty of perjury under the laws of the State of California that the above 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.

Executed on December 21, 2012, at Los Angeles, California.


YOLANDA S. RAMOS

THE SUPERIOR COURT OF CALIFORNIA, COUNTY OF SANTA CLARA
ELECTRONIC FILING - WWW.SCEFILING.ORG

c/o Glotrans
2915 McClure Street
Oakland, CA 94609
TEL: (510) 208-4775
FAX: (510) 465-7348
EMAIL: Info@Glotrans.com

THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SANTA CLARA

Coordination Proceeding Special Title (Rule
1550(b)) ANTELOPE VALLEY GROUNDWATER CASES
(JCCP
4408) Included Actions: Los Angeles County
Waterworks District No. 40

Antelope Valley Groundwater Cases (JCCP 4408)

Lead Case No. 1-05-CV-049053

Hon. Jack Komar

Plaintiff,

vs.

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, consolidated actions, Case Nos. RIC
353 840, RIC 344 436, RIC 344 668.

Defendant.

AND RELATED ACTIONS

PROOF OF SERVICE
Electronic Proof of Service

I am employed in the County of Alameda, State of California.

I am over the age of 18 and not a party to the within action; my business address is 2915 McClure
Street, Oakland, CA 94609.

The documents described on page 2 of this Electronic Proof of Service were submitted via the
worldwide web on Fri. December 21, 2012 at 3:09 PM PST and served by electronic mail notification.

I have reviewed the Court's Order Concerning Electronic Filing and Service of Pleading Documents and
am readily familiar with the contents of said Order. Under the terms of said Order, I certify the above-described
document's electronic service in the following manner:

The document was electronically filed on the Court's website, <http://www.scefilling.org>, on Fri. December
21, 2012 at 3:09 PM PST

Upon approval of the document by the Court, an electronic mail message was transmitted to all parties
on the electronic service list maintained for this case. The message identified the document and provided
instructions for accessing the document on the worldwide web.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and

correct. Executed on December 21, 2012 at Oakland, California.

Dated: December 21, 2012

For WWW.SCEFILING.ORG

Andy Jamieson

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3 Electronic Proof of Service
4 Page 2

5 Document(s) submitted by Edward J. Casey of Alston & Bird LLP on Fri, December 21, 2012 at 3:09 PM PST

6 1. Response: Response To December 12, 2012 Discovery Order For Phase 4 Trial
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1 **PROOF OF SERVICE**

2 I, Yolanda S. Ramos, declare:

3 I am employed in the County of Los Angeles, State of California. I am over the age
4 of 18 and not a party to the within action. My business address is Alston & Bird LLP, 333
South Hope Street, Sixteenth Floor, Los Angeles, CA 90071.

5 On September 4, 2015, I served the document(s) described as **CROSS-
6 DEFENDANT SGS ANTELOPE VALLEY DEVELOPMENT, LLC'S AMENDED
7 DISCLOSURE OF EXHIBITS REGARDING PROVE-UP TRIAL RE: [PROPOSED]
STIPULATED JUDGMENT AND PHYSICAL SOLUTION** on the interested parties in
this action by enclosing the document(s) in a sealed envelope addressed as follows:

8 ☐ BY MAIL: I am "readily familiar" with this firm's practice for the collection and the
9 processing of correspondence for mailing with the United States Postal Service. In the
ordinary course of business, the correspondence would be deposited with the United
10 States Postal Service at 333 South Hope Street, Los Angeles, California 90071 with
postage thereon fully prepaid the same day on which the correspondence was placed for
collection and mailing at the firm. Following ordinary business practices, I placed for
11 collection and mailing with the United States Postal Service such envelope at Alston &
Bird LLP, 333 South Hope Street, Los Angeles, California 90071.

12 ☒ BY ELECTRONIC MAIL: By posting the document listed above to the Santa Clara
13 Superior Court website: www.sceffiling.org regarding the ANTELOPE VALLEY
GROUNDWATER matter.

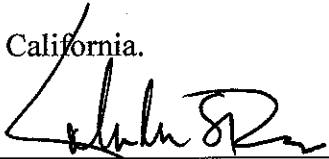
14 ☐ BY FEDERAL EXPRESS ☐ UPS NEXT DAY AIR ☐ OVERNIGHT DELIVERY:
15 I deposited such envelope in a facility regularly maintained by ☐ FEDERAL EXPRESS
☐ UPS ☐ Overnight Delivery [specify name of service:] with delivery fees fully
16 provided for or delivered the envelope to a courier or driver of ☐ FEDERAL
EXPRESS ☐ UPS ☐ OVERNIGHT DELIVERY [specify name of service:]
17 authorized to receive documents at Alston & Bird LLP, 333 South Hope Street, Los
Angeles, California 90071 with delivery fees fully provided for.

18 ☐ BY FACSIMILE: I telecopied a copy of said document(s) to the following addressee(s)
19 at the following number(s) in accordance with the written confirmation of counsel in this
action.

20 ☒ [State] I declare under penalty of perjury under the laws of the State of California that
21 the above is true and correct.

22 ☐ [Federal] I declare under penalty of perjury that the foregoing is true and correct.

23
24 Executed on September 4, 2015, at Los Angeles, California.

25 
26 YOLANDA S. RAMOS
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