EXHIBIT A

From:	Kimberly Huangfu [huangfu@lbbslaw.com]
Sent:	Monday, September 15, 2008 11:09 AM
То:	Daniel Roberts
Subject:	LACWW Meter Readings

Daniel:

My name is Kimberly Huangfu and I represent Anaverde LLC in the Antelope GW Adjudication.. I am currently at the LACWW facility in Alhambra. We received the meter readings for 1990 through 2001. We believe there might have been some mislabeling in terms of the year since the last few pages have 2001 readings (for the same wells) more than once. Please call me at 2096018030 or 7034088656 as soon as possible. Thank you.

Kimberly



From: Sent: To: Cc: Subject: Daniel Roberts Monday, September 15, 2008 2:16 PM 'jsalazar@lbbslaw.com' Jeffrey Dunn; Eric Garner; Stefanie Hedlund Antelope Valley Groundwater Adjudication - update to spreadsheet

Good afternoon Joe. We have spoken with our client contacts at the LACWW District No. 40 in regard to your question this morning about data for July and August to update the spreadsheet for 2008. Unfortunately that data is not yet available. They expect that it will be available for those months in about a month from now. We are also in the process of looking into the other items you told me you were unable to locate in what has been produced thus far, namely the well map and the groundwater elevations within each well. I will e-mail you separately when I have an update on those items.

Daniel S. Roberts for Best Best & Krieger LLP Daniel.Roberts@bbklaw.com

EXHIBIT C

From:	Daniel Roberts
Sent:	Monday, September 15, 2008 5:44 PM
То:	'Kimberly Huangfu'
Cc:	Jeffrey Dunn; Eric Garner; Stefanie Hedlund
Subject:	RE: Map of Well Locations
Attachments:	Well Map - LACo_WWD_40-04_New_Wells.pdf; LACo_WWD_40-35_38_Cluster_asr.pdf;
	Ground elevations at wells.xls

As we discussed by telephone, please find attached the maps of well locations. Also attached is a spreadsheet of the ground elevations at the wells, which you can use to calculate the elevation of the water level. Please let me know if you require further information.

Daniel S. Roberts for Best Best & Krieger LLP Daniel.Roberts@bbklaw.com

From: Kimberly Huangfu [mailto:huangfu@lbbslaw.com] **Sent:** Monday, September 15, 2008 5:40 PM **To:** Daniel Roberts **Subject:** Map of Well Locations

Dan, Here's my contact information.

Thanks, Kim

KIMBERLY HUANGFU LEWIS BRISBOIS BISGAARD & SMITH LLP 221 N. Figueroa Street, Suite 1200, Los Angeles, CA 90012 direct 213.580.3907 | tel 213.250.1800 | fax 213.250.7900 huangfu@lbbslaw.com | http://www.lbbslaw.com

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From: Sent: To: Subject: Kimberly Huangfu [huangfu@lbbslaw.com] Monday, September 15, 2008 5:46 PM Daniel Roberts RE: Map of Well Locations

Got it.

Thanks, Kim

>>>

From:	"Daniel Roberts" < Daniel.Roberts@bbklaw.com>
To:	"Kimberly Huangfu" <huangfu@lbbslaw.com></huangfu@lbbslaw.com>
CC:	"Jeffrey Dunn" <jeffrey.dunn@bbklaw.com>, "Eric Garner" <eric.garner@bbklaw.com>, "Stefanie Hedlund" <stefanie.hedlund@bbklaw.com></stefanie.hedlund@bbklaw.com></eric.garner@bbklaw.com></jeffrey.dunn@bbklaw.com>

Date: 9/15/2008 5:44 PM

Subject: RE: Map of Well Locations

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Daniel S. Roberts for Best Best & Krieger LLP Daniel.Roberts@bbklaw.com

From: Kimberly Huangfu [mailto:huangfu@lbbslaw.com] Sent: Monday, September 15, 2008 5:40 PM To: Daniel Roberts Subject: Map of Well Locations

Dan, Here's my contact information.

Thanks, Kim

KIMBERLY HUANGFU LEWIS BRISBOIS BISGAARD & SMITH LLP

221 N. Figueroa Street, Suite 1200, Los Angeles, CA 90012 direct 213.580.3907 | tel 213.250.1800 | fax 213.250.7900 huangfu@lbbslaw.com | http://www.lbbslaw.com This communication constitutes an electronic communication within the meaning of the Electronic Communications Privacy Act, 18 USC 2510, and its disclosure is strictly limited to the recipient intended by the sender of this message. This communication may contain confidential and privileged material for the sole use of the intended recipient and receipt by anyone other than the intended recipient does not constitute a loss of the confidential or privileged nature of the communication. Any review or distribution by others is strictly prohibited. If you are not the intended recipient please contact the sender by return electronic mail and delete all copies of this communication. For more information about Lewis Brisbois Bisgaard & Smith, visit us at http://www.lbbslaw.com.

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EXHIBIT E

From:	Daniel Roberts
Sent:	Tuesday, September 16, 2008 12:17 PM
То:	'Kimberly Huangfu'
Cc:	Jeffrey Dunn; Eric Garner; Stefanie Hedlund
Subject:	Antelope Valley Groundwater spreadsheet
Attachments:	Avalley LACWWD No 40 Groundwater Pumping_v1 (2).xls

As we discussed, please find attached the electronic version of the spreadsheet. I will ask about the other two items you mentioned and get back to you as soon as I can.

Daniel S. Roberts for Best Best & Krieger LLP Daniel.Roberts@bbklaw.com

12

ÊXHIBIT F

From:	Kimberly Huangfu [huangfu@lbbslaw.com]
Sent:	Tuesday, September 16, 2008 12:26 PM
То:	Daniel Roberts
Cc:	Eric Garner; Jeffrey Dunn; Stefanie Hedlund; Joseph Salazar; Malissa McKeith
Subject:	Fwd: Antelope Valley Groundwater spreadsheet
Attachments:	Avalley LACWWD No 40 Groundwater Pumping_v1 (2).xls

Thanks, Dan. Years 2002-2008 are still mislabeled as 2001. Can you please correct those cells and email the revised spreadsheet back to me?

KIMBERLY HUANGFU LEWIS BRISBOIS BISGAARD & SMITH LLP 221 N. Figueroa Street, Suite 1200, Los Angeles, CA 90012 direct 213.580.3907 | tel 213.250.1800 | fax 213.250.7900 huangfu@lbbslaw.com | http://www.ibbslaw.com

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>>>

From: "Daniel Roberts" <Daniel.Roberts@bbklaw.com>

To: "Kimberly Huangfu" <huangfu@lbbslaw.com>

CC: "Jeffrey Dunn" <jeffrey.dunn@BBKLAW.COM>, "Eric Garner" <Eric.Garner@bbklaw.com>, "Stefanie Hedlund" <Stefanie.Hedlund@bbklaw.com>

Date: 9/16/2008 12:17 PM

Subject: Antelope Valley Groundwater -- spreadsheet

As we discussed, please find attached the electronic version of the spreadsheet. I will ask about the other two items you mentioned and get back to you as soon as I can.

Daniel S. Roberts for Best Best & Krieger LLP Daniel.Roberts@bbklaw.com

IRS CIRCULAR 230 NOTICE: To ensure compliance with requirements imposed by the IRS, we inform you that any U.S. tax advice contained in this communication (or in any attachment) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii)

promoting, marketing or recommending to another party any transaction or matter addressed in this communication (or in any attachment).

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From: Sent: To: Cc: Subject: Kimberly Huangfu [huangfu@lbbslaw.com] Tuesday, September 16, 2008 2:42 PM Daniel Roberts Joseph Salazar; Malissa McKeith Antelope Valley GW Adjud. - Questions re Groundwater PumpingSpreadsheet

Dan,

Upon reviewing the "groundwater pumping" file you provided this morning, we have identified aspects of the spreadsheet that require further clarification. Please confirm the following:

(1) Since the static water levels have no corresponding unit of measurement, please verify that the readings are depthto-water measurements expressed in feet.

(2) The static water levels do not include decimal places. Please explain how these measurements were taken each month. For instance, were they measured with sounding tape or a pneumatic sounding tube?

(3) We would also like the status of water levels measured as depth-to-water from the ground level elevation datum in each well provided in the excel spreadsheet.

We checked the LCSE and Wildermuth ftp site this morning. Unfortunately, the more recent data from 2007-2008 has not yet been posted. That makes it even more crucial for us to obtain the July and August 2008 groundwater elevation levels and production data. Please let me know before the close of business today whether any progress has been made to obtain this data.

Thanks,

Kim

KIMBERLY HUANGFU LEWIS BRISBOIS BISGAARD & SMITH LLP 221 N. Figueroa Street, Suite 1200, Los Angeles, CA 90012 direct 213.580.3907 | tel 213.250.1800 | fax 213.250.7900

huangfu@lbbslaw.com | http://www.lbbslaw.com

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EXHIBIT G

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EXHIBIT H

Daniel Roberts
Tuesday, September 16, 2008 4:26 PM
'Kimberly Huangfu'
Eric Garner; Jeffrey Dunn; Stefanie Hedlund; Joseph Salazar; Malissa McKeith
RE: Antelope Valley Groundwater spreadsheet

I noticed that typo in the later sheets as well, but the tabs for those years clearly identify which year is referenced, and the document says what it says; I can't alter the document.

As far as your other questions you asked by telephone earlier today, I am still waiting on an answer re the July and August data -- I know it's not available now, but I'm not sure yet how soon we can get it to you. As for the maps, all the District's maps are printed with that disclaimer, so we have no maps to produce to you without that disclaimer on them.

-Dan

From: Kimberly Huangfu [mailto:huangfu@lbbslaw.com]
Sent: Tuesday, September 16, 2008 12:26 PM
To: Daniel Roberts
Cc: Eric Garner; Jeffrey Dunn; Stefanie Hedlund; Joseph Salazar; Malissa McKeith
Subject: Fwd: Antelope Valley Groundwater -- spreadsheet

Thanks, Dan. Years 2002-2008 are still mislabeled as 2001. Can you please correct those cells and email the revised spreadsheet back to me?

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>>>

From: "Daniel Roberts" < Daniel.Roberts@bbklaw.com>

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To: "Kimberly Huangfu" <huangfu@lbbslaw.com>

CC: "Jeffrey Dunn" <jeffrey.dunn@BBKLAW.COM>, "Eric Garner" <Eric.Garner@bbklaw.com>, "Stefanie Hedlund" <Stefanie.Hedlund@bbklaw.com>

Date: 9/16/2008 12:17 PM

Subject: Antelope Valley Groundwater - spreadsheet

As we discussed, please find attached the electronic version of the spreadsheet. I will ask about the other two items you mentioned and get back to you as soon as I can.

Daniel S. Roberts for Best Best & Krieger LLP Daniel.Roberts@bbklaw.com

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EXHIBIT I

From:Daniel RobertsSent:Tuesday, September 16, 2008 4:32 PMTo:'Kimberly Huangfu'Cc:Joseph Salazar; Malissa McKeith; Jeffrey Dunn; Eric Garner; Stefanie HedlundSubject:RE: Antelope Valley GW Adjud. - Questions re Groundwater PumpingSpreadsheet

I have the following responses to your questions below:

(1) Correct - the units of measurement for the static water levels are in depth to groundwater measured in feet.

(2) The water level measurements were either collected with a sounding tape or a pneumatic sounding tube.

(3) We do not understand the difference between what you are asking and what was already provided in the spreadsheet.

Daniel S. Roberts for Best Best & Krieger LLP Daniel.Roberts@bbklaw.com

From: Kimberly Huangfu [mailto:huangfu@lbbslaw.com]
Sent: Tuesday, September 16, 2008 2:42 PM
To: Daniel Roberts
Cc: Joseph Salazar; Malissa McKeith
Subject: Antelope Valley GW Adjud. - Questions re Groundwater PumpingSpreadsheet

Dan,

Upon reviewing the "groundwater pumping" file you provided this morning, we have identified aspects of the spreadsheet that require further clarification. Please confirm the following:

(1) Since the static water levels have no corresponding unit of measurement, please verify that the readings are depthto-water measurements expressed in feet.

(2) The static water levels do not include decimal places. Please explain how these measurements were taken each month. For instance, were they measured with sounding tape or a pneumatic sounding tube?

(3) We would also like the status of water levels measured as depth-to-water from the ground level elevation datum in each well provided in the excel spreadsheet.

We checked the LCSE and Wildermuth ftp site this morning. Unfortunately, the more recent data from 2007-2008 has not yet been posted. That makes it even more crucial for us to obtain the July and August 2008 groundwater elevation levels and production data. Please let me know before the close of business today whether any progress has been made to obtain this data.

Thanks,

Kim

KIMBERLY HUANGFU LEWIS BRISBOIS BISGAARD & SMITH LLP

221 N. Figueroa Street, Suite 1200, Los Angeles, CA 90012 direct 213.580.3907 | tel 213.250.1800 | fax 213.250.7900 huangfu@lbbslaw.com | http://www.lbbslaw.com

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EXHIBIT J

From:	Kimberly Huangfu [huangfu@lbbslaw.com]
Sent:	Tuesday, September 16, 2008 9:50 PM
То:	Daniel Roberts
Cc:	Eric Garner; Jeffrey Dunn; Stefanie Hediund; Joseph Salazar; Malissa McKeith
Subject:	RE: Antelope Valley GW Adjud Questions re GroundwaterPumping Spreadsheet

Dan,

(2) Please confirm whether the water levels were measured with a sounding tape or a pneumatic sounding tube. The reason we are asking for the method of measurement is that sounding tape is measured in hundredths of a food (or at a minimum tenths of a foot). As such, the figures provided in the excel spreadsheet only include whole numbers and fail to provide more precise measurements.

(3) To clarify our inquiry as to number 3, is it correct for us to assume the ground elevation given for each well is the measurement point from which LACWW takes its depth-to-water, i.e., "Static Water Level", measurement?

Thanks, Kimberly

>>> "Daniel Roberts" <<u>Daniel.Roberts@bbklaw.com</u>> 09/16/08 4:31 PM >>>
I have the following responses to your questions below:

(1) Correct - the units of measurement for the static water levels are in depth to groundwater measured in feet.

(2) The water level measurements were either collected with a sounding tape or a pneumatic sounding tube.

(3) We do not understand the difference between what you are asking and what was already provided in the spreadsheet.

Daniel S. Roberts for Best Best & Krieger LLP Daniel.Roberts@bbklaw.com

From: Kimberly Huangfu [mailto:huangfu@lbbslaw.com]
Sent: Tuesday, September 16, 2008 2:42 PM
To: Daniel Roberts
Cc: Joseph Salazar; Malissa McKeith
Subject: Antelope Valley GW Adjud. - Questions re Groundwater
PumpingSpreadsheet

Dan,

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(1) Since the static water levels have no corresponding unit of measurement, please verify that the readings are depth-to-water measurements expressed in feet.

(2) The static water levels do not include decimal places. Please explain how these measurements were taken each month. For instance, were they measured with sounding tape or a pneumatic sounding tube?

(3) We would also like the status of water levels measured as depth-to-water from the ground level elevation datum in each well provided in the excel spreadsheet.

We checked the LCSE and Wildermuth ftp site this morning. Unfortunately, the more recent data from 2007-2008 has not yet been posted. That makes it even more crucial for us to obtain the July and August 2008 groundwater elevation levels and production data. Please let me know before the close of business today whether any progress has been made to obtain this data.

Thanks,

Kim

KIMBERLY HUANGFU

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EXHIBIT K

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From:	Kimberly Huangfu [huangfu@lbbslaw.com]
Sent:	Tuesday, September 16, 2008 10:12 PM
To:	Daniel Roberts
Cc:	Eric Garner; Jeffrey Dunn; Stefanie Hedlund; Joseph Salazar; Malissa McKeith
Subject:	RE: Antelope Valley Groundwater spreadsheet

While I understand that you are unable to alter the document, we need a comprehensive spreadsheet with proper labeling. Though the individual tabs at the bottom of the screen are correctly labeled, when one goes to print the individual spreadsheets, the tabs are not printed and therefore not accurately reflected in the printout.

As for the July and August 2008 meter readings, this data should be readily available since meter readings are routinely collected at the end of each month. As such, your client should be able to access this data with relative ease. Let me know if you are unable to obtain the July and August 2008 meter readings by the close of business on Wednesday. If this is the case, we will have to go to the Judge and explain our situation.

Thanks, Kimberly

>>> "Daniel Roberts" <Daniel.Roberts@bbklaw.com> 09/16/08 4:26 PM >>> I noticed that typo in the later sheets as well, but the tabs for those years clearly identify which year is referenced, and the document says what it says; I can't alter the document.

As far as your other questions you asked by telephone earlier today, I am still waiting on an answer re the July and August data -- I know it's not available now, but I'm not sure yet how soon we can get it to you. As for the maps, all the District's maps are printed with that disclaimer, so we have no maps to produce to you without that disclaimer on them.

-Dan

From: Kimberly Huangfu [mailto:huangfu@lbbslaw.com]
Sent: Tuesday, September 16, 2008 12:26 PM
To: Daniel Roberts
Cc: Eric Garner; Jeffrey Dunn; Stefanie Hedlund; Joseph Salazar; Malissa
McKeith
Subject: Fwd: Antelope Valley Groundwater -- spreadsheet

Thanks, Dan. Years 2002-2008 are still mislabeled as 2001. Can you please correct those cells and email the revised spreadsheet back to me?

\$

KIMBERLY HUANGFU

LEWIS BRISBOIS BISGAARD & SMITH LLP

221 N. Figueroa Street, Suite 1200, Los Angeles, CA 90012

direct 213.580.3907 | tel 213.250.1800 | fax 213.250.7900

huangfu@lbbslaw.com <mailto:huangfu@lbbslaw.com>
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>>>

From:

"Daniel Roberts" <Daniel.Roberts@bbklaw.com>

To:

"Kimberly Huangfu" <huangfu@lbbslaw.com>

2

CC:

"Jeffrey Dunn" <jeffrey.dunn@BBKLAW.COM>, "Eric Garner" <Eric.Garner@bbklaw.com>, "Stefanie Hedlund" <Stefanie.Hedlund@bbklaw.com> Date: 9/16/2008 12:17 PM Subject: Antelope Valley Groundwater -- spreadsheet As we discussed, please find attached the electronic version of the spreadsheet. I will ask about the other two items you mentioned and get back to you as soon as I can. Daniel S. Roberts for Best Best & Krieger LLP Daniel.Roberts@bbklaw.com ***** IRS CIRCULAR 230 NOTICE: To ensure compliance with requirements imposed by the IRS, we inform you that any U.S. tax advice contained in this communication (or in any attachment) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed in this communication (or in any attachment). ******* ******** This email and any files transmitted with it may contain privileged or otherwise confidential information. If you are not the intended recipient, or believe that you may have received this communication in error, please advise the sender via reply email and delete the email you received. *****

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EXHIBIT L

From:	Daniel Roberts
Sent:	Wednesday, September 17, 2008 8:49 AM
То:	'Kimberly Huangfu'
Cc:	Eric Garner; Jeffrey Dunn; Stefanie Hedlund; Joseph Salazar; Malissa McKeith
Subject:	RE: Antelope Valley GW Adjud Questions re GroundwaterPumping Spreadsheet

I am trying to get confirmation for you on #3 below and will e-mail as soon as I have something on that point. As to #2, the preferred method is to use the pneumatic sounding tube, if it is available. If the reading comes back questionable, they use the tape to verify it.

-----Original Message-----From: Kimberly Huangfu [mailto:huangfu@lbbslaw.com] Sent: Tuesday, September 16, 2008 9:50 PM To: Daniel Roberts Cc: Eric Garner; Jeffrey Dunn; Stefanie Hedlund; Joseph Salazar; Malissa McKeith Subject: RE: Antelope Valley GW Adjud. - Questions re GroundwaterPumping Spreadsheet

Dan,

(2) Please confirm whether the water levels were measured with a sounding tape or a pneumatic sounding tube. The reason we are asking for the method of measurement is that sounding tape is measured in hundredths of a food (or at a minimum tenths of a foot). As such, the figures provided in the excel spreadsheet only include whole numbers and fail to provide more precise measurements.

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Thanks, Kimberly

>>> "Daniel Roberts" <Daniel.Roberts@bbklaw.com> 09/16/08 4:31 PM >>>
I have the following responses to your questions below:

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(3) We do not understand the difference between what you are asking and what was already provided in the spreadsheet.

Daniel S. Roberts for Best Best & Krieger LLP Daniel.Roberts@bbklaw.com

1

From: Kimberly Huangfu [mailto:huangfu@lbbslaw.com]
Sent: Tuesday, September 16, 2008 2:42 PM
To: Daniel Roberts
Cc: Joseph Salazar; Malissa McKeith
Subject: Antelope Valley GW Adjud. - Questions re Groundwater
PumpingSpreadsheet

Dan,

Upon reviewing the "groundwater pumping" file you provided this morning, we have identified aspects of the spreadsheet that require further clarification. Please confirm the following:

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Thanks,

Kim

2

LEWIS BRISBOIS BISGAARD & SMITH LLP

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EXHIBIT M

.

Daniel Roberts

From:Daniel RobertsSent:Wednesday, September 17, 2008 9:07 AMTo:'Kimberly Huangfu'Cc:Eric Garner; Jeffrey Dunn; Stefanie Hedlund; 'Joseph Salazar'; 'Malissa McKeith'Subject:RE: Antelope Valley GW Adjud. - Questions re GroundwaterPumping Spreadsheet

Your assumption on #3 is correct.

-----Original Message-----From: Daniel Roberts Sent: Wednesday, September 17, 2008 8:49 AM To: 'Kimberly Huangfu' Cc: Eric Garner; Jeffrey Dunn; Stefanie Hedlund; Joseph Salazar; Malissa McKeith Subject: RE: Antelope Valley GW Adjud. - Questions re GroundwaterPumping Spreadsheet

I am trying to get confirmation for you on #3 below and will e-mail as soon as I have something on that point. As to #2, the preferred method is to use the pneumatic sounding tube, if it is available. If the reading comes back questionable, they use the tape to verify it.

-----Original Message-----From: Kimberly Huangfu [mailto:huangfu@lbbslaw.com] Sent: Tuesday, September 16, 2008 9:50 PM To: Daniel Roberts Cc: Eric Garner; Jeffrey Dunn; Stefanie Hedlund; Joseph Salazar; Malissa McKeith Subject: RE: Antelope Valley GW Adjud. - Questions re GroundwaterPumping Spreadsheet

Dan,

(2) Please confirm whether the water levels were measured with a sounding tape or a pneumatic sounding tube. The reason we are asking for the method of measurement is that sounding tape is measured in hundredths of a food (or at a minimum tenths of a foot). As such, the figures provided in the excel spreadsheet only include whole numbers and fail to provide more precise measurements.

(3) To clarify our inquiry as to number 3, is it correct for us to assume the ground elevation given for each well is the measurement point from which LACWW takes its depth-to-water, i.e., "Static Water Level", measurement?

Thanks, Kimberly

>>> "Daniel Roberts" <Daniel.Roberts@bbklaw.com> 09/16/08 4:31 PM >>>
I have the following responses to your questions below:

(1) Correct - the units of measurement for the static water levels are in depth to groundwater measured in feet.

(2) The water level measurements were either collected with a sounding tape or a pneumatic sounding tube.

(3) We do not understand the difference between what you are asking and what was already provided in the spreadsheet.

Daniel S. Roberts for Best Best & Krieger LLP Daniel.Roberts@bbklaw.com

From: Kimberly Huangfu [mailto:huangfu@lbbslaw.com] Sent: Tuesday, September 16, 2008 2:42 PM To: Daniel Roberts Cc: Joseph Salazar; Malissa McKeith Subject: Antelope Valley GW Adjud. - Questions re Groundwater PumpingSpreadsheet

Dan,

Upon reviewing the "groundwater pumping" file you provided this morning, we have identified aspects of the spreadsheet that require further clarification. Please confirm the following:

(1) Since the static water levels have no corresponding unit of measurement, please verify that the readings are depth-to-water measurements expressed in feet.

(2) The static water levels do not include decimal places. Please explain how these measurements were taken each month. For instance, were they measured with sounding tape or a pneumatic sounding tube?

(3) We would also like the status of water levels measured as depth-to-water from the ground level elevation datum in each well provided in the excel spreadsheet.

We checked the LCSE and Wildermuth ftp site this morning. Unfortunately, the more recent data from 2007-2008 has not yet been posted. That makes it even more crucial for us to obtain the July and August 2008 groundwater elevation levels and production data. Please let me know before the close of business today whether any progress has been made to obtain this data.

Thanks,

KIMBERLY HUANGFU

LEWIS BRISBOIS BISGAARD & SMITH LLP

221 N. Figueroa Street, Suite 1200, Los Angeles, CA 90012

direct 213.580.3907 | tel 213.250.1800 | fax 213.250.7900

huangfu@lbbslaw.com <mailto:huangfu@lbbslaw.com>
http://www.lbbslaw.com <http://www.lbbslaw.com/>

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Kim



Daniel Roberts

From:	Daniel Roberts
Sent:	Wednesday, September 17, 2008 9:09 AM
То:	'Kimberly Huangfu'
Cc:	Eric Garner; Jeffrey Dunn; Stefanie Hedlund; Joseph Salazar; Malissa McKeith
Subject:	RE: Antelope Valley Groundwater spreadsheet

(1) We have provided you with the document as it is kept by the District. Unfortunately, the "total" column has a typo in the year marker for some of the years, but that is how the document exists. We are not going to modify the document, nor are we going to create a new document. We have provided the information you requested in the form in which it exists.

(2) My understanding is that the July and August 2008 raw data have been collected in the field, but that information has not yet been processed, as there is a lag in processing such items, particularly in the high-demand summer months. No, that data will not be available by the close of business today. We have provided on this spreadsheet data the most-recent data that is available, which covers the last 18 1/2 years (222 months). We will provide the later data once it is available.

-----Original Message-----From: Kimberly Huangfu [mailto:huangfu@lbbslaw.com] Sent: Tuesday, September 16, 2008 10:12 PM To: Daniel Roberts Cc: Eric Garner; Jeffrey Dunn; Stefanie Hedlund; Joseph Salazar; Malissa McKeith Subject: RE: Antelope Valley Groundwater -- spreadsheet

While I understand that you are unable to alter the document, we need a comprehensive spreadsheet with proper labeling. Though the individual tabs at the bottom of the screen are correctly labeled, when one goes to print the individual spreadsheets, the tabs are not printed and therefore not accurately reflected in the printout.

As for the July and August 2008 meter readings, this data should be readily available since meter readings are routinely collected at the end of each month. As such, your client should be able to access this data with relative ease. Let me know if you are unable to obtain the July and August 2008 meter readings by the close of business on Wednesday. If this is the case, we will have to go to the Judge and explain our situation.

Thanks, Kimberly

>>> "Daniel Roberts" <Daniel.Roberts@bbklaw.com> 09/16/08 4:26 PM >>> I noticed that typo in the later sheets as well, but the tabs for those years clearly identify which year is referenced, and the document says what it says; I can't alter the document.

As far as your other questions you asked by telephone earlier today, I am still waiting on an answer re the July and August data -- I know it's not available now, but I'm not sure yet how soon we can get it to you. As for the maps, all the District's maps are printed with that disclaimer, so we have no maps to produce to you without that disclaimer on them.

-Dan

From: Kimberly Huangfu [mailto:huangfu@lbbslaw.com]
Sent: Tuesday, September 16, 2008 12:26 PM
To: Daniel Roberts
Cc: Eric Garner; Jeffrey Dunn; Stefanie Hedlund; Joseph Salazar; Malissa
McKeith
Subject: Fwd: Antelope Valley Groundwater -- spreadsheet

Thanks, Dan. Years 2002-2008 are still mislabeled as 2001. Can you please correct those cells and email the revised spreadsheet back to me?

KIMBERLY HUANGFU

LEWIS BRISBOIS BISGAARD & SMITH LLP

221 N. Figueroa Street, Suite 1200, Los Angeles, CA 90012

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huangfu@lbbslaw.com <mailto:huangfu@lbbslaw.com> |
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>>>

From:

"Daniel Roberts" <Daniel.Roberts@bbklaw.com>

To:

"Kimberly Huangfu" <huangfu@lbbslaw.com>

CC:

"Jeffrey Dunn" <jeffrey.dunn@BBKLAW.COM>, "Eric Garner" <Eric.Garner@bbklaw.com>, "Stefanie Hedlund" <Stefanie.Hedlund@bbklaw.com>

Date:

9/16/2008 12:17 PM

Subject:

Antelope Valley Groundwater -- spreadsheet

As we discussed, please find attached the electronic version of the spreadsheet. I will ask about the other two items you mentioned and get back to you as soon as I can.

Daniel S. Roberts for Best Best & Krieger LLP Daniel.Roberts@bbklaw.com

3

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EXHIBIT O

Daniel Roberts

From:	Kimberly Huangfu [huangfu@lbbslaw.com]
Sent:	Wednesday, September 17, 2008 5:22 PM
To:	Daniel Roberts
Subject:	RE: Antelope Valley Groundwater spreadsheet

Dan,

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24 - 5
27 - 5
35 - 2

Thanks, Kim

KIMBERLY HUANGFU

LEWIS BRISBOIS BISGAARD & SMITH LLP 221 N. Figueroa Street, Suite 1200, Los Angeles, CA 90012 direct 213.580.3907 | tel 213.250.1800 | fax 213.250.7900 huangfu@lbbslaw.com | http://www.lbbslaw.com

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CC: "Eric Garner" <Eric.Garner@bbklaw.com>, "Jeffrey Dunn" <jeffrey.dunn@BBKLAW.COM>, "Stefanie Hedlund" <Stefanie.Hedlund@bbklaw.com>, "Joseph Salazar" <jsalazar@lbbslaw.com>, "Malissa McKeith" <MCKEITH@lbbslaw.com>

Date: 9/17/2008 9:08 AM

Subject: RE: Antelope Valley Groundwater -- spreadsheet

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To:

"Kimberly Huangfu" <huangfu@lbbslaw.com>

CC:

"Jeffrey Dunn" <jeffrey.dunn@BBKLAW.COM>, "Eric Garner" <Eric.Garner@bbklaw.com>, "Stefanie Hedlund" <Stefanie.Hedlund@bbklaw.com>

Date:

9/16/2008 12:17 PM

Subject:

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As we discussed, please find attached the electronic version of the spreadsheet. I will ask about the other two items you mentioned and get back to you as soon as I can.

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.

EXHIBIT P

Daniel Roberts

From: Sent: To: Subject: Daniel Roberts Thursday, September 18, 2008 7:39 AM 'Kimberly Huangfu' RE: Antelope Valley Groundwater -- spreadsheet

I'll see what I can find out.

From: Kimberly Huangfu [mailto:huangfu@lbbslaw.com] Sent: Wednesday, September 17, 2008 5:22 PM To: Daniel Roberts Subject: RE: Antelope Valley Groundwater -- spreadsheet

Dan,

We also need the state well identification numbers for the following three wells:

24 - 5
24 - 5 27 - 5 35 - 2
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Thanks, Kim

KIMBERLY HUANGFULEWIS BRISBOIS BISGAARD & SMITH LLP221 N. Figueroa Street, Suite 1200, Los Angeles, CA 90012direct 213.580.3907tel 213.250.1800fax 213.250.7900

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>>> From: "Daniel Roberts" <Daniel.Roberts@bbklaw.com> To: "Kimberly Huangfu" <huangfu@lbbslaw.com> CC: "Eric Garner" <Eric.Garner@bbklaw.com>, "Jeffrey Dunn" <jeffrey.dunn@BBKLAW.COM>, "Stefanie Hedlund" <Stefanie.Hedlund@bbklaw.com>, "Joseph Salazar" <jsalazar@lbbslaw.com>, "Malissa McKeith" <MCKEITH@lbbslaw.com>

Date: 9/17/2008 9:08 AM

Subject: RE: Antelope Valley Groundwater -- spreadsheet

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McKeith

Subject: RE: Antelope Valley Groundwater -- spreadsheet

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To:

"Kimberly Huangfu" <huangfu@lbbslaw.com>

CC:

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Daniel Roberts

From:
Sent:
To:
Cc:
Subject:

Daniel Roberts Thursday, September 18, 2008 10:44 AM 'Kimberly Huangfu' Jeffrey Dunn; Eric Garner; Stefanie Hedlund RE: Antelope Valley Groundwater -- spreadsheet

Here you go.

24-5: state code 1910203-014

27-5: state code 1910203-019

35-2: state code 1910027-002

From: Kimberly Huangfu [mailto:huangfu@lbbslaw.com] Sent: Wednesday, September 17, 2008 5:22 PM To: Daniel Roberts Subject: RE: Antelope Valley Groundwater -- spreadsheet

Dan,

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KIMBERLY HUANGFU LEWIS BRISBOIS BISGAARD & SMITH LLP

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- CC: "Eric Garner" <Eric.Garner@bbklaw.com>, "Jeffrey Dunn" <jeffrey.dunn@BBKLAW.COM>, "Stefanie Hedlund" <Stefanie.Hedlund@bbklaw.com>, "Joseph Salazar" <jsalazar@lbbslaw.com>, "Malissa McKeith" <MCKEITH@lbbslaw.com>

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Subject: RE: Antelope Valley Groundwater -- spreadsheet

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huangfu@lbbslaw.com <mailto:huangfu@lbbslaw.com> | http://www.lbbslaw.com <http://www.lbbslaw.com/>

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"Daniel Roberts" < Daniel.Roberts@bbklaw.com>

To:

"Kimberly Huangfu" <huangfu@lbbslaw.com>

CC:

"Jeffrey Dunn" <jeffrey.dunn@BBKLAW.COM>, "Eric Garner" <Eric.Garner@bbklaw.com>, "Stefanie Hedlund" <Stefanie.Hedlund@bbklaw.com>

Date:

9/16/2008 12:17 PM

Subject:

Antelope Valley Groundwater -- spreadsheet

As we discussed, please find attached the electronic version of the spreadsheet. I will ask about the other two items you mentioned and get back to you as soon as I can.

Daniel S. Roberts for Best Best & Krieger LLP Daniel.Roberts@bbklaw.com

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EXHIBIT R

Daniel Roberts

From: Sent:	Kimberly Huangfu [huangfu@lbbslaw.com] Thursday, September 18, 2008 11:44 AM
То:	Daniel Roberts
Cc:	Eric Garner; Jeffrey Dunn; Stefanie Hedlund; Joseph Salazar; Malissa McKeith
Subject:	RE: Antelope Valley Groundwater UTM Coordinates
Attachments:	LACWW Waterwells Needing Coordinates_1.pdf

Thanks, Dan. Attached please a table of the well IDS and USGS IDS that we were able to identify from your spreadsheet. Unfortunately, 25 of 48 wells cannot be located with any precision because they are not included in the database.

Please send us the UTM coordinates for all 48 wells referenced in the attached pdf, along with the state well ID (which should reference township, range, section and subsection locations) for Wells 24-5, 27-5, and 35-2.

Thanks, Kimberly

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<Stefanie.Hedlund@bbklaw.com>

 Date:
 9/18/2008 10:43 AM

 Subject:
 RE: Antelope Valley Groundwater -- spreadsheet

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24-5: state code 1910203-014

27-5: state code 1910203-019

35-2: state code 1910027-002

From: Kimberly Huangfu [mailto:huangfu@lbbslaw.com] Sent: Wednesday, September 17, 2008 5:22 PM To: Daniel Roberts Subject: RE: Antelope Valley Groundwater -- spreadsheet

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Thanks, Kim

KIMBERLY HUANGFU LEWIS BRISBOIS BISGAARD & SMITH LLP

221 N. Figueroa Street, Suite 1200, Los Angeles, CA 90012 direct 213.580.3907 | tel 213.250.1800 | fax 213.250.7900 huangfu@lbbslaw.com | http://www.lbbslaw.com

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Date: 9/17/2008 9:08 AM

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-----Original Message-----From: Kimberly Huangfu [mailto:huangfu@lbbslaw.com] Sent: Tuesday, September 16, 2008 10:12 PM To: Daniel Roberts Cc: Eric Garner; Jeffrey Dunn; Stefanie Hedlund; Joseph Salazar; Malissa McKeith Subject: RE: Antelope Valley Groundwater -- spreadsheet

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-Dan

From: Kimberly Huangfu [mailto:huangfu@lbbslaw.com] Sent: Tuesday, September 16, 2008 12:26 PM To: Daniel Roberts Cc: Eric Garner; Jeffrey Dunn; Stefanie Hedlund; Joseph Salazar; Malissa McKeith Subject: Fwd: Antelope Valley Groundwater -- spreadsheet

Thanks, Dan. Years 2002-2008 are still mislabeled as 2001. Can you please correct those cells and email the revised spreadsheet back to me?

KIMBERLY HUANGFU

LEWIS BRISBOIS BISGAARD & SMITH LLP

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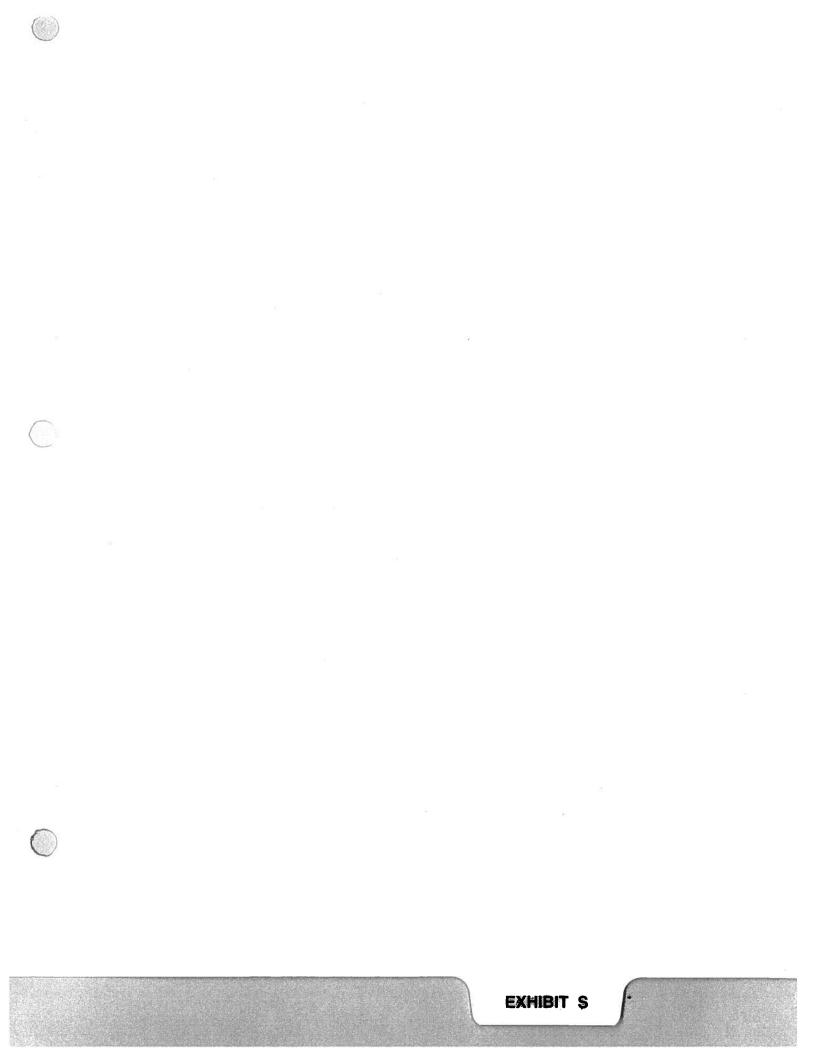
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Daniel Roberts

From:	Daniel Roberts
Sent:	Monday, September 22, 2008 12:07 PM
То:	'Kimberly Huangfu'
Cc:	Eric Garner; Jeffrey Dunn; Stefanie Hedlund; Joseph Salazar; Malissa McKeith
Subject:	RE: Antelope Valley Groundwater UTM Coordinates

Here's what I have been able to find out:

First, the state well identification numbers you ask for 24-5, 27-5, and 35-2 are in my message to you immediately below your question.

As for the UTM coordinates, the District does not have UTM coordinates (or latitude / longitude) coordinates for all of its wells. The coordinates that the District does have, as well as the addresses of the wells, are located on the well driller's reports, which were produced to you. I hope that helps.

-Dan

From: Kimberly Huangfu [mailto:huangfu@lbbslaw.com]
Sent: Thursday, September 18, 2008 11:44 AM
To: Daniel Roberts
Cc: Eric Garner; Jeffrey Dunn; Stefanie Hedlund; Joseph Salazar; Malissa McKeith
Subject: RE: Antelope Valley Groundwater -- UTM Coordinates

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Date:	9/18/2008 10:43 AM
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