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LOS ANGELES COUNTY WATERWORKS  
DISTRICT NO. 40

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**COUNTY OF LOS ANGELES**

Coordination Proceeding  
Special Title (Rule 1550 (b))

Judicial Council Coordination  
Proceeding No. 4408

**ANTELOPE VALLEY GROUNDWATER  
CASES**

**CASE MANAGEMENT STATEMENT**

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

ORANGE\JVD\22057.1

SERVICE OF PROCESS

Pursuant to court order to serve known property owners with 100 or more acres, County of Los Angeles Waterworks District No. 40 filed Doe amendments in the coordinated Kern County and Los Angeles County actions, naming 38 doe defendants and 181 doe defendants, respectively. This group included Edwards Air Force Base, the largest property ownership in the Basin.

Service was by mail with Notices and Acknowledgment of Receipt. The County has received 65 executed Notices and Acknowledgment of Receipt, approximately 20 requests for extensions of time to respond; and has otherwise heard from approximately 30 other parties.

The United States, on behalf of Edwards Air Force Base, requests additional time to respond beyond the statutorily-authorized time. The County agrees to a reasonable extension of the response period for Edwards Air Force Base and for other parties who so request.

As indicated at the last Case Management Conference, the County has identified approximately 500 property owners with 50 to 99 acres. The County proposes a 120-day time period for service upon this property owner group. During that time the County will personally serve property owners in the +100 acre group, if necessary.

CASE MANAGEMENT

The County respectfully submits the following principle topics that could and should be addressed at the outset of these coordinated cases:

1. The nature and potential dimensions of the litigation.

2. The major procedural and substantive problems likely to be incurred.

3. The procedures for efficient case management.

Accordingly the County suggests that the Court order legal counsel to do the following before the next case management conference to be held within 45 days:

1. Submit brief factual statements to the Court to assist in understanding the background, setting and likely dimensions of the litigation.

2. Meet and confer to propose a structure of representation including the appointment of liaison counsel.

3. Submit an issue statement that identifies disputed factual and legal issues as specifically as possible.

4. Submit a plan or schedule for the next 12 months including a plan or schedule for service of process.

Dated: December 1, 2005

BEST BEST & KRIEGER LLP

By: 

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WATERWORKS DISTRICT NO. 40

**PROOF OF SERVICE**

I, Kerry V. Keefe, declare:

I am a resident of the State of California and over the age of eighteen years, and not a party to the within action; my business address is Best Best & Krieger LLP, 5 Park Plaza, Suite 1500, Irvine, California 92614. On December 1, 2005, I served the within document(s):

**CASE MANAGEMENT STATEMENT**

- ☒ by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m.\*
- ☒ by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Irvine, California addressed as set forth below.
- ☐ by causing personal delivery by ASAP Corporate Services of the document(s) listed above to the person(s) at the address(es) set forth below.
- ☐ by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.
- ☐ I caused such envelope to be delivered via overnight delivery addressed as indicated on the attached service list. Such envelope was deposited for delivery by Federal Express following the firm's ordinary business practices.

(SEE ATTACHED SERVICE LIST)

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

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

Executed on December 1, 2005 at Irvine, California.

  
Kerry V. Keefe

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