

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): JEFFREY V. DUNN SBN 131926; STEFANIE D. HEDLUND SBN 239787 Best Best & Krieger, LLP - Irvine 5 Park Plaza, #1500 Irvine, CA 92614 TELEPHONE NO: (949) 263-2600 FAX NO (Optional): E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): CROSS-COMPLAINANTS	FOR COURT USE ONLY										
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: Room 109 CITY AND ZIP CODE: Los Angeles 90012 BRANCH NAME: Central District, Stanley Mosk Courthouse											
PLAINTIFF/PETITIONER: Los Angeles County Waterworks District No. 40, et al. DEFENDANT/RESPONDENT: Diamond Farming Company, et al.											
<table style="width: 100%;"> <tr> <td style="width: 30%;"> REQUEST FOR (Application) </td> <td style="width: 10%;"> <input checked="" type="checkbox"/> </td> <td style="width: 30%;"> Entry of Default </td> <td style="width: 10%;"> <input type="checkbox"/> </td> <td style="width: 10%;"> Clerk's Judgment </td> </tr> <tr> <td></td> <td> <input type="checkbox"/> </td> <td> Court Judgment </td> <td colspan="2"></td> </tr> </table>	REQUEST FOR (Application)	<input checked="" type="checkbox"/>	Entry of Default	<input type="checkbox"/>	Clerk's Judgment		<input type="checkbox"/>	Court Judgment			CASE NUMBER: 4408
REQUEST FOR (Application)	<input checked="" type="checkbox"/>	Entry of Default	<input type="checkbox"/>	Clerk's Judgment							
	<input type="checkbox"/>	Court Judgment									

1. TO THE CLERK: On the complaint or cross-complaint filed
- on (date): August 21, 2008
 - by (name): Los Angeles County Waterworks District No. 40, et al.
 - ☒ Enter default of defendant (names): See Exhibit "A" attached hereto.
 - ☐ I request a court judgment under Code of Civil Procedure sections 585(b), 585(c), 989, etc., against defendant (names):
 (Testimony required. Apply to the clerk for a hearing date, unless the court will enter a judgment on an affidavit under Code Civ. Proc., § 585(d).)
 - ☐ Enter clerk's judgment
 - (1) ☐ for restitution of the premises only and issue a writ of execution on the judgment. Code of Civil Procedure section 1174(c) does not apply. (Code Civ. Proc., § 1169.)
☐ Include in the judgment all tenants, subtenants, named claimants, and other occupants of the premises. The *Prejudgment Claim of Right to Possession* was served in compliance with Code of Civil Procedure section 415.46.
 - (2) ☐ under Code of Civil Procedure section 585(a). (Complete the declaration under Code Civ. Proc., § 585.5 on the reverse (item 5).)
 - (3) ☐ for default previously entered on (date):
2. Judgment to be entered.
- | | <u>Amount</u> | <u>Credits acknowledged</u> | <u>Balance</u> |
|---|----------------|-----------------------------|----------------|
| a. Demand of complaint.....\$ | \$ | \$ | 0.00 |
| b. Statement of damages * | | | |
| (1) Special | \$ | \$ | 0.00 |
| (2) General | \$ | \$ | 0.00 |
| c. Interest | \$ | \$ | 0.00 |
| d. Costs (see reverse) | 0.00 \$ | \$ | 0.00 |
| e. Attorney fees | \$ | \$ | 0.00 |
| f. TOTALS | 0.00 \$ | 0.00 \$ | 0.00 |
| g. Daily damages were demanded in complaint at the rate of: \$ _____ per day beginning (date): _____ | | | |
| (* <i>Personal injury or wrongful death actions; Code Civ. Proc., § 425.11.</i>) | | | |
3. ☐ (Check if filed in an unlawful detainer case) Legal document assistant or unlawful detainer assistant information is on the reverse (complete item 4).

Date: 12/15/2010

Stefanie D. Hedlund

(TYPE OR PRINT NAME)



(SIGNATURE OF PLAINTIFF OR ATTORNEY FOR PLAINTIFF)

- (1) ☐ Default entered as requested on (date):
 (2) ☐ Default NOT entered as requested (state reason):

**FOR COURT
USE ONLY**

Clerk, by _____, Deputy

PLAINTIFF/PETITIONER: Los Angeles County Waterworks District No. 40, et al.	CASE NUMBER: 4408
DEFENDANT/RESPONDENT: Diamond Farming Company, et al.	

4. **Legal document assistant or unlawful detainer assistant (Bus. & Prof. Code, § 6400 et seq.).** A legal document assistant or unlawful detainer assistant ☐ did ☐ did not for compensation give advice or assistance with this form.
(If declarant has received **any** help or advice for pay from a legal document assistant or unlawful detainer assistant, state):
- a. Assistant's name:
b. Street address, city, and zip code:
c. Telephone no.:
d. County of registration:
e. Registration no.:
f. Expires on (date):
5. ☐ **Declaration under Code of Civil Procedure Section 585.5 (required for entry of default under Code Civ. Proc., § 585(a)).**
This action
- a. ☐ is ☐ is not on a contract or installment sale for goods or services subject to Civ. Code, § 1801 et seq. (Unruh Act),
b. ☐ is ☐ is not on a conditional sales contract subject to Civ. Code, § 2981 et seq. (Rees-Levering Motor Vehicle Sales and Finance Act).
c. ☐ is ☐ is not on an obligation for goods, services, loans, or extensions of credit subject to Code Civ. Proc., § 395(b).
6. **Declaration of mailing (Code Civ. Proc., § 587).** A copy of this *Request for Entry of Default* was
- a. ☐ **not mailed** to the following defendants, whose addresses are **unknown** to plaintiff or plaintiff's attorney (names):
b. ☒ **mailed** first-class, postage prepaid, in a sealed envelope addressed to each defendant's attorney of record or, if none, to each defendant's last known address as follows:
(1) Mailed on (date): 12/15/2010
(2) To (specify names and addresses shown on the envelopes):
Please see attached Attachment to Proof of Service

I declare under penalty of perjury under the laws of the State of California that the foregoing items 4, 5, and 6 are true and correct.
Date: 12/15/2010

Stefanie D. Hedlund

(TYPE OR PRINT NAME)

► 
(SIGNATURE OF DECLARANT)

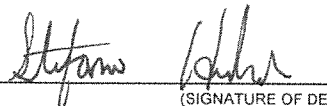
7. **Memorandum of costs (required if money judgment requested).** Costs and disbursements are as follows (Code Civ. Proc., § 1033.5):
- a. Clerk's filing fees \$
b. Process server's fees \$
c. Other (specify): \$
d. \$
e. **TOTAL** \$ 0.00
- f. ☒ Costs and disbursements are waived.
- g. I am the attorney, agent, or party who claims these costs. To the best of my knowledge and belief this memorandum of costs is correct and these costs were necessarily incurred in this case.

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

Date: 12/15/2010

Stefanie D. Hedlund

(TYPE OR PRINT NAME)

► 
(SIGNATURE OF DECLARANT)

8. ☒ **Declaration of nonmilitary status (required for a judgment).** No defendant named in item 1c of the application is in the military service so as to be entitled to the benefits of the Servicemembers Civil Relief Act (50 U.S.C. App. § 501 et seq.).

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

Date: 12/15/2010

Stefanie D. Hedlund

(TYPE OR PRINT NAME)

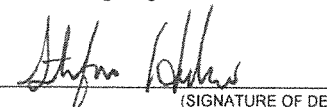
► 
(SIGNATURE OF DECLARANT)

EXHIBIT "A"

Enter default of defendant (names):

JP ELIOPULOS ENTERPRISES, INC., ROE 302	YOUNGSIN LEE, ROE 319
JENSEN TRUST, ROE 303	LEONA VALLEY HUNTING CLUB, ROE 320
JOSHUA RANCH DEVELOPMENT INC., ROE 305	SUE LEVINE, ROE 321
KATHRYN T. KARLAKIS, ROE 309	PHILLIP W. LEWIS, CO-TRUSTEE, ROE 322
JAMES KIM, ROE 310	SENG MOV LIM, ROE 324
GLENN K. KIM FAMILY LLC, ROE 311	LITTLE ROCK SAND AND GRAVEL INC., ROE 327
ROSE M KOLSTAD, ROE 312	LITTLE ROCK AGGREGATE CO. INC., ROE 328
KORDA, ROE 313	JANET L. LYMAN, ROE 331
SARAH KORDA, ROE 314	LAURIE F. MAGBANUA, ROE 333
LANCASTER AND 120 111, LLC, ROE 315	LORRAINE R. MCANDREW TRUST, ROE 336
GEORGE R. LAZENBY, ROE 317	MEDINA FOOD INDUSTRIES, INC., ROE 337
SAMUEL LEE, ROE 318	LIM S. MOV, ROE 339

ATTACHMENT TO PROOF OF SERVICE

JP ELIOPULOS ENTERPRISES, INC., ROE 302 PO BOX 5237 LANCASTER CA 93539	YOUNGSIN LEE, ROE 319 855 BRUCE DR PALO ALTO, CA 94303
JENSEN TRUST, ROE 303 17254 LIBERTAD DR SAN DIEGO, CA 92127	LEONA VALLEY HUNTING CLUB, ROE 320 45408 160TH ST WEST LANCASTER CA 93536
JOSHUA RANCH DEVELOPMENT INC., ROE 305 42225 10TH ST WEST LANCASTER, CA 93534	SUE LEVINE, ROE 321 37054 BOX LEAF RD PALMDALE CA 93550
KATHRYN T. KARLAKIS, ROE 309 22144 CLARENDON ST #214 WOODLAND HILLS CA 91367	PHILLIP W. LEWIS, CO-TRUSTEE, ROE 322 28400 CRUTHERS CREEK RD PEARBLOSSOM CA 93553
JAMES KIM, ROE 310 127 S ADAMS ST #9 GLENDALE CA 91205	SENG MOV LIM, ROE 324 PO BOX 501 MONTEREY PARK CA 91754
GLENN K. KIM FAMILY LLC, ROE 311 127 S ADAMS ST #9 GLENDALE CA 91205	LITTLE ROCK SAND AND GRAVEL INC., ROE 327 44909 10TH ST WEST LANCASTER CA 93534
ROSE M KOLSTAD, ROE 312 4734 RADNOR AVE LAKEWOOD, CA 90713	LITTLE ROCK AGGREGATE CO. INC., ROE 328 7311 E AVENUE T LITTLEROCK, CA 93543
KORDA, ROE 313 66 E SANTA CLARA STREET SAN JOSE, CA 95113	JANET L. LYMAN, ROE 331 6871 E SEPTIMO ST LONG BEACH CA 90815
SARAH KORDA, ROE 314 2208 WESTRIDGE ROAD LOS ANGELES, CA 90049	LAURIE F. MAGBANUA, ROE 333 10561 VASSAR AVE CHATSWORTH CA 91311
LANCASTER AND 120 111, LLC, ROE 315 8800 N GAINES CENTER DR #255 SCOTTSDALE AZ 95258	LORRAINE R. MCANDREW TRUST, ROE 336 17 COPRA LN PACIFIC PALISADES CA 90272
GEORGE R. LAZENBY, ROE 317 11981 BRENTBRIDGE LN LOS ANGELES, CA 90049	MEDINA FOOD INDUSTRIES, INC., ROE 337 MANTRADE BLDG PASONG 3 FLR MAKATI METRO, MANILA, PHILIPPINES 1107
SAMUEL LEE, ROE 318 855 BRUCE DR PALO ALTO, CA 94303	LIM S. MOV, ROE 339 7440 GRAVES AVE ROSEMEAD CA 91770

PROOF OF SERVICE

I, Marie Milovanovich, 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, 400 Capitol Mall, Suite 1650, Sacramento, California 95814. On December 15, 2010, I served the within document(s):

REQUEST FOR ENTRY OF DEFAULT



by posting the document(s) listed above to the Santa Clara County Superior Court website in regard to the Antelope Valley Groundwater matter.



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.

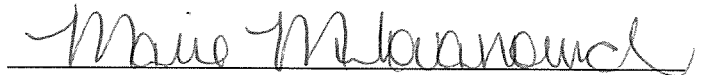


I caused such envelope to be delivered via overnight delivery addressed as indicated on the attached service list. Such envelope was deposited for delivery by Federal Express following the firm's ordinary business practices.

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 15, 2010, at Sacramento, California.



Marie Milovanovich