

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): <b>JEFFREY V. DUNN SBN 131926; STEFANIE D. HEDLUND SBN 239787</b> 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): <b>CROSS-COMPLAINANTS</b>	<b>FOR COURT USE ONLY</b>
<b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES</b> 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.	
<b>REQUEST FOR</b> <input checked="" type="checkbox"/> <b>Entry of Default</b> <input type="checkbox"/> <b>Clerk's Judgment</b> (Application) <input type="checkbox"/> <b>Court Judgment</b>	CASE NUMBER: <b>4408</b>

1. TO THE CLERK: On the complaint or cross-complaint filed
- a. on (date): August 21, 2008
- b. by (name): Los Angeles County Waterworks District No. 40, et al.
- c. ☒ Enter default of defendant (names): See Exhibit "A" attached hereto.
- d. ☐ 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).)
- e. ☐ 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. <b>TOTALS</b> .....        | <b>0.00 \$</b> | <b>0.00 \$</b>              | <b>0.00</b>    |
- g. **Daily damages** were demanded in complaint at the rate of: \$ \_\_\_\_\_ per day beginning (date): \_\_\_\_\_
- (\* *Personal injury or wrongful death actions; Code Civ. Proc., § 425.11.*)
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)

<b>FOR COURT USE ONLY</b>	(1) <input type="checkbox"/> Default entered as requested on (date): (2) <input type="checkbox"/> Default NOT entered as requested (state reason):  Clerk, by _____, Deputy
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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):

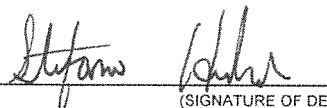
a. Clerk's filing fees ..... \$  
b. Process server's fees ..... \$  
c. Other (specify): ..... \$  
d. .... \$  
e. **TOTAL** ..... \$ 0.00

- 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)

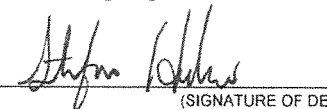
►   
(SIGNATURE OF DECLARANT)

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):

SOUAD R. NASIR, DOE 119	ROYAL WESTERN PROPERTIES LLC, DOE 142
SIMIN C. NEMAN, DOE 121	DANIEL SAPARZADEH, DOE 145
FRANK T. NGUYEN, DOE 123	MARK H. SHAFRON, DOE 152
JUANITA R. NICHOLS, DOE 124	DONNA L. SIMPSON, DOE 155
OLIVER NICHOLS, DOE 125	GARETH L. SIMPSON, DOE 156
OLIVER NICHOLS, AS TRUSTEE OF THE NICHOLS FAMILY TRUST, DOE 126	GARETH L. SIMPSON, TRUSTEE OF THE SIMPSON FAMILY TRUST, DOE 157
NORMAN L. POULSEN, DOE 128	GEORGE L. STIMSON JR., AS TRUSTEE OF THE GEORGE L. STIMSON, JR. TRUST, DOE 164
VICTORIA RAHIMI, DOE 130	WILMA D. TRUEBLOOD, DOE 172
VERONIKA REINELT, DOE 132	KEITH E. WALES, DOE 177
REINELT ROSENLOECHER CORP. PSP., DOE 133	E C WHEELER LLC, DOE 178
ROSEMOUNT EQUITIES LLC SERIES, DOE 140	ALEX WODCHIS, DOE 180
ROYAL INVESTORS GROUP, DOE 141	MIKE M. WU, DOE 183
WILMA D. TRUEBLOOD AS TRUSTEE OF THE TRUEBLOOD FAMILY TRUST, DOE 173	

ATTACHMENT TO PROOF OF SERVICE

SOUAD R. NASIR, DOE 119 11987 SHOSHONE AVE GRANADA HILLS, CA 91344-2200	ROYAL WESTERN PROPERTIES LLC, DOE 142 C/O EBRAHIM SHAKIBKHOU 1000 SANTA MONICA BLVD STE 800 LOS ANGELES, CA 90067
SIMIN C. NEMAN, DOE 121 1005 S. CENTRAL AVE LOS ANGELES, CA 90021-2039	DANIEL SAPARZADEH, DOE 145 2524 LA MESA DR SANTA MONICA, CA 90402-2335
FRANK T. NGUYEN, DOE 123 9353 BOLSA AVENUE F8 WESTMINSTER, CA 92683	MARK H. SHAFRON, DOE 152 16133 VENTURA BLVD STE 700 ENCINO, CA 9136-2406
JUANITA R. NICHOLS, DOE 124 P. O. BOX 1510 LANCASTER, CA 93539-1510	DONNA L. SIMPSON, DOE 155 3877 TERNEZ DR MOORPARK, CA 93021-9765
OLIVER NICHOLS, DOE 125 P.O. BOX 1510 LANCASTER, CA 93539-1510	GARETH L. SIMPSON, DOE 156 3877 TERNEZ DR MOORPARK, CA 93021-9765
OLIVER NICHOLS, AS TRUSTEE OF THE NICHOLS FAMILY TRUST, DOE 126 P.O. BOX 1510 LANCASTER, CA 93539-1510	GARETH L. SIMPSON, TRUSTEE OF THE SIMPSON FAMILY TRUST, DOE 157 3877 TERNEZ DR MOORPARK, CA 93021-9765
NORMAN L. POULSEN, DOE 128 P.O. BOX 1 SANTA ROSA, CA 95402-0001	GEORGE L. STIMSON JR., AS TRUSTEE OF THE GEORGE L. STIMSON, JR. TRUST, DOE 164 P.O. BOX 7194 VICTORVILLE, CA 92392
VICTORIA RAHIMI, DOE 130 1005 S. CENTRAL AVE LOS ANGELES, CA 90021-2039	WILMA D. TRUEBLOOD, DOE 172 39027 YUCCA TREE ST PALMDALE, CA 93551-3829
VERONIKA REINELT, DOE 132 2701 FORRESTER DRIVE LOS ANGELES, CA 90064-3402	KEITH E. WALES, DOE 177 C/O DENNIS G. MERENBACH, ESQ. 225 E CARRILLO ST STE 202 SANTA BARBARA, CA 92101-2185
REINELT ROSENLOECHER CORP. PSP., DOE 133 2701 FORRESTER DRIVE LOS ANGELES, CA 90064-3402	E C WHEELER LLC, DOE 178 5958 WALNUT WAY PALMDALE, CA 93551-2812
ROSEMOUNT EQUITIES LLC SERIES, DOE 140 C/O WILLIAM HENRY ROSENBERG 1631 SCHUYLER RD BEVERLY HILLS, CA 90210-2543	ALEX WODCHIS, DOE 180 727 NEWPORT CENTER DR, NO. 112 NEWPORT BEACH, CA 92660
ROYAL INVESTORS GROUP, DOE 141 C/O EBRAHIM SHAKIBKHOU 11950 SAN VICENTE BLVD STE 200 LOS ANGELES, CA 90049-5013	MIKE M. WU, DOE 183 40638 SLAYTON ST. FREMONT, CA 94539-3838
WILMA D. TRUEBLOOD AS TRUSTEE OF THE TRUEBLOOD FAMILY TRUST, DOE 173 39027 YUCCA TREE ST PALMDALE, CA 93551-3829	

**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.

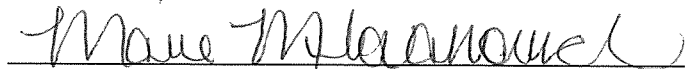


I caused such envelope to be delivered via overnight delivery addressed as indicated on the attached service list. Such envelope was deposited for delivery by Federal Express following the firm's ordinary business practices.

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