

BEST BEST & KRIEGER LLP

ERIC L. GARNER, Bar No. 130665

JEFFREY V. DUNN, Bar No. 131926

WENDY Y. WANG, Bar No. 228923

18101 VON KARMAN AVENUE, SUITE 1000

IRVINE, CALIFORNIA 92612

TELEPHONE: (949) 263-2600

TELECOPIER: (949) 260-0972

Attorneys for LOS ANGELES COUNTY

WATERWORKS DISTRICT NO. 40

OFFICE OF COUNTY COUNSEL

COUNTY OF LOS ANGELES

MARK J. SALADINO, BAR NO. 118305

COUNTY COUNSEL

WARREN WELLEN, Bar No. 139152

PRINCIPAL DEPUTY COUNTY COUNSEL

500 WEST TEMPLE STREET

LOS ANGELES, CALIFORNIA 90012

TELEPHONE: (213) 974-8407

TELECOPIER: (213) 687-7337

Attorneys for Cross-Complainant LOS ANGELES

COUNTY WATERWORKS DISTRICT NO. 40

[See Next Page For Additional Counsel]

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES – CENTRAL DISTRICT

ANTELOPE VALLEY GROUNDWATER
CASES

Included Actions:

Los Angeles County Waterworks District No.
40 v. Diamond Farming Co., Superior Court of
California, County of Los Angeles, Case No.
BC 325201;

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, Case Nos. RIC 353 840,
RIC 344 436, RIC 344 668;

RICHARD WOOD, on behalf of himself and
all other similarly situated v. A.V. Materials,
Inc., et al., Superior Court of California,
County of Los Angeles, Case No. BC509546.

EXEMPT FROM FILING FEES
UNDER GOVERNMENT CODE
SECTION 6103

Judicial Council Coordination Proceeding
No. 4408

CLASS ACTION

Santa Clara Case No. 1-05-CV-049053
Assigned to the Honorable Jack Komar

PUBLIC WATER SUPPLIERS'
EVIDENTIARY OBJECTIONS TO
EXHIBITS SUBMITTED IN SUPPORT
OF BLUM TRUST'S MOTION FOR
SUMMARY
JUDGMENT/ADJUDICATION;
[PROPOSED] ORDER RE
EVIDENTIARY OBJECTIONS TO
EXHIBITS

RICHARDS WATSON & GERSHON

James L. Markman, Bar No. 43536
355 S. Grand Avenue, 40th Floor
Los Angeles, CA 90071-3101
(213) 626-8484 (213) 626-0078 fax
Attorneys for City of Palmdale

MURPHY & EVERTZ LLP

Douglas J. Evertz, Bar No. 123066
650 Town Center Drive, Suite 550
Costa Mesa, CA 92626
(714) 277-1700; (714) 277-1777 fax
Attorneys for City of Lancaster and Rosamond
Community Services District

LEMIEUX & O'NEILL

Wayne Lemieux, Bar No. 43501
Keith Lemieux, Bar No. 161850
4165 E. Thousand Oaks Blvd., Ste. 350
Westlake Village, CA 91362
(805) 495-4770 (805) 495-2787 fax
Attorneys for Littlerock Creek Irrigation District,
Palm Ranch Irrigation District, Desert Lake
Community Services District, North Edwards Water
District, Llano Del Rio Water Company, Llano
Mutual Water Company, and Big Rock Mutual Water
Company

CHARLTON WEEKS LLP

Bradley T. Weeks, Bar No. 173745
1007 West Avenue M-14, Suite A
Palmdale, CA 93551
(661) 265-0969 (661) 265-1650 fax
Attorneys for Quartz Hill Water District

CALIFORNIA WATER SERVICE COMPANY

John Tootle, Bar No. 181822
2632 West 237th Street
Torrance, CA 90505
(310) 257-1488; (310) 325-4605-fax

Los Angeles County Waterworks District No. 40, City of Palmdale, City of Lancaster, Rosamond Community Services District, Littlerock Creek Irrigation District, Palm Ranch Irrigation District, Desert Lake Community Services District, North Edwards Water District, Llano Del Rio Water Company, Llano Mutual Water Company, Big Rock Mutual Water Company, Quartz Hill Water District, and California Water Service Company (collectively, “Public Water Suppliers”) hereby submit their Objections to the Declaration of Sheldon R. Blum submitted by Blum Trust in support of its Motion for Summary Adjudication.

Objection No.	Material Objected to:	Grounds for Objection:	Ruling on the Objection:
1.	Exhibit 1	(a) Lack of foundation. (Evid. Code §§ 401 and 403.) (b) Lack of Authentication (Evid. Code §1401.)	Sustained: _____ Overruled: _____
2.	Exhibit 2	(a) Lack of foundation. (Evid. Code §§ 401 and 403.) (b) Hearsay. (Evid. Code § 1200.) (c) Lack of Authentication (Evid. Code §1401.)	Sustained: _____ Overruled: _____
3.	Exhibit 3	(a) Hearsay. (Evid. Code § 1200.)	Sustained: _____ Overruled: _____

4.	Exhibit 4	(a) Hearsay. (Evid. Code § 1200.) (b) Lack of Authentication (Evid. Code §1401.)	Sustained: _____ Overruled: _____
5.	Exhibit 5	(a) Hearsay. (Evid. Code § 1200.)	Sustained: _____ Overruled: _____
6.	Exhibit 6	(a) Lack of foundation. (Evid. Code §§ 401 and 403.) (b) Hearsay. (Evid. Code § 1200.) (c) Lack of Authentication (Evid. Code §1401.)	Sustained: _____ Overruled: _____
7.	Exhibit 9-2	(a) Hearsay. (Evid. Code § 1200.)	Sustained: _____ Overruled: _____
8.	Exhibit 10	(a) Hearsay. (Evid. Code § 1200.)	Sustained: _____ Overruled: _____

1 2 3 4 5	9.	Exhibit 11	(a) Lack of foundation. (Evid. Code §§ 401 and 403.) (b) Hearsay. (Evid. Code § 1200.) (c) Lack of Authentication (Evid. Code §1401.)	Sustained: _____ Overruled: _____
-----------------------	----	------------	---	--

6
7 Dated: December 8, 2014

BEST BEST & KRIEGER LLP

8
9 By

ERIC L. GARNER
JEFFREY V. DUNN
WENDY Y. WANG
Attorneys for LOS ANGELES COUNTY
WATERWORKS DISTRICT NO. 40

10
11
12
13 **ORDER**

14 **IT IS SO ORDERED.**

15
16 Dated: _____

17
18
19
20
21
22
23
24
25
26
27
28 JUDGE OF THE SUPERIOR COURT

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, 18101 Von Karman Avenue, Suite 1000, Irvine, California 92712. On December 8, 2014, I served the within document(s):

**PUBLIC WATER SUPPLIERS' EVIDENTIARY OBJECTIONS TO THE
DECLARATION OF SHELDON R. BLUM IN SUPPORT OF BLUM
TRUST'S MOTION FOR SUMMARY JUDGMENT/ADJUDICATION;
[PROPOSED] ORDER RE EVIDENTIARY OBJECTIONS TO EXHIBITS**

- ☒ 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 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 8, 2014, at Irvine, California.


Kerry V. Keefe

26345 00000\9452296.2