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## BEST BEST & KRIEGER

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May 7, 2015

## VIA POSTING TO THE COURT'S WEBSITE AND E-MAIL

Rosamond Mobile Home Park Milana VII, LLC

Robert Coldren (clo@coldrenlawoffices.com) Daniel T. Rudderow (danrudderow@gmail.com)

Eyherabide Land Co. Charles Tapia and Nellie Tapia Family Trust

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Desert Breeze MHP, LLC Reesdale Mutual Water Company
Daniel Epstein (epstein14@yahoo.com)

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Re: Antelope Valley Groundwater Adjudication
Judicial Counsel Coordination Number 4408

Dear Counsel and Unrepresented Parties:

I write on behalf of the stipulating parties to the Proposed Judgment and Physical Solution in the above captioned case. Based on your court statements and/or communications with various stipulating parties, I understand that you wish to discuss settlement possibilities during the May 11, 2015 meet and confer session.

In anticipation of the settlement discussions, the stipulating parties request that you share the information and documents described below prior to Monday's meeting and bring such information with you on Monday. As background, this request is an abridged version of the Court's Phase 4 Discovery Order<sup>1</sup> and will help the stipulating parties understand your claim and facilitate a meaningful settlement discussion.

Please provide the following information and documents for the calendar years of 2000, 2001, 2002, 2003, 2004, 2011 or 2012 ("Time Periods"):

1. The Assessor Parcel Number, Assessor Tax Number, or Assessor's Identification Number of the parcel owned by you in the Antelope Valley Adjudication Area.

<sup>1</sup> The Phase 4 Discovery Order is available online at

http://www.scefiling.org/filingdocs/194/57805/92065\_2012x12x11xJKxDiscoveryxOrderxforxPhasex4xTrial.pdf.



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May 7, 2015 Page 2

- 2. The record title owner of the parcel referenced in subparagraph 1 from 2000 to present.
- 3. Whether a groundwater well existed on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
- 4. Whether a groundwater well was operated on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
- 5. The amount of groundwater produced from the parcel referenced in subparagraph 1 in any or all of the Time Periods.
- 6. The use(s) to which groundwater produced from the parcel was put on the parcel referenced in subparagraph 1 in any or all of the Time Periods.
- 7. The use(s) to which the parcel referenced in subparagraph 1 was put during each of the calendar years 2011 and 2012.
- 8. The crop type, if any, grown on the parcel and irrigated acreage of such crop type during each of the calendar years during the Time Periods.
- 9. If you pump groundwater from another parcel for use on the parcel referenced in subparagraph 1 in any or all of the Time Periods, please identify the parcel from where water was pumped.
  - a. State the amount of water rights claimed as the reasonable and beneficial use for such parcel
- 10. For each parcel referenced in subparagraph 1, please indicate whether the parcel was leased during the Time Periods. If it was leased,
  - a. Provide the name of the lessee
  - b. The parcel's identification number
  - c. Whether the lease allocated credits for groundwater produced by lessee
  - d. Amount of groundwater produced by the lessee and delivered to another parcel and such parcel's identification number
  - e. If known, the use(s) to which groundwater was put to the leased parcel for calendar years 2011 and 2012.



May 7, 2015 Page 3

- 11. If you claim groundwater rights based upon something other than groundwater production or use, please state the claim for each of the Time Periods, and your legal and factual basis.
- 12. Documentations supporting your responses to requests 1 to 11, including but not limited to groundwater extraction notices, well logs, well efficiency test records, leases . . . etc.
- 13. All other information and documentations that substantiates your claim for water rights.

The stipulating parties request that your response be verified (e.g., provided under oath as true and correct).

Please provide the requested information either by posting them at the Court's website or email to me at jeffrey.dunn@bbklaw.com and copying Wendy Wang at wendy.wang@bbklaw.com.

Sincerely,

Jeffrey V. Dunn

of BEST BEST & KRIEGER LLP

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