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8 Attorneys for Defendant and Cross-Complainant,
9 Palmdale Water District

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13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
14 **FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

15 Coordination Proceeding
16 Special Title (Rule 1550 (b))

Judicial Council Coordination
Proceeding No. 4408

17 **ANTELOPE VALLEY GROUNDWATER
18 CASES**

[Assigned to The Honorable Jack Komar, Judge
Santa Clara County Superior Court, Dept. 17]

Santa Clara Court Case No. 1-05-CV-049053

**DECLARATION OF DENNIS LAMOREAUX
IN LIEU OF DEPOSITION TESTIMONY
FOR PHASE 4 TRIAL**

19 I, Dennis LaMoreaux, declare:

20 1. I am the general manager of Palmdale Water District (“District”). I have personal
21 knowledge of each fact stated in this declaration.

22 2. The District owns property that overlies the Antelope Valley Area of Adjudication.
23 Exhibit A to the District’s Response to Discovery Order for Phase 4 Trial, filed December 21, 2012,
24 which contains detailed information regarding the District’s property including APNs, is hereby
25 incorporated by reference.

26 3. The District produces water from groundwater wells, which are metered. Exhibit E to the
27 District’s Response to Discovery Order for Phase 4 Trial is derived from the District’s records kept in
28 the ordinary course of the District’s business and shows the District’s water production by well and by

1 year from 2000 through November 30, 2012. The District claims these amounts as its reasonable and
2 beneficial use of groundwater for the years in question.

3 4. The District also purchases imported water from the State Water Project. Exhibit E to the
4 District's Response to Discovery Order for Phase 4 Trial is derived from the District's records kept in
5 the ordinary course of the District's business and shows the District's deliveries of water from the State
6 Water Project by year from 2000 through November 30, 2012.

7 I declare under penalty of perjury that the foregoing is true and correct, and that this declaration
8 is executed January 31, 2013, at Palmdale, California.

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11 Dennis LaMoreaux
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