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Attorneys for Charles Tapia and the Nellie Tapia Family  
Trust

**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-254348

Wm. Bolthouse Farms, Inc. v. City of  
Lancaster, Diamond Farming Co. v. City of  
Lancaster, Diamond Farming Co. v.  
Palmdale Water District, Superior Court of  
California, County of Riverside, Case Nos.  
RIC 353 840, RIC 344 436, RIC 344 668

Judicial Council Coordination No. 4408

**CLASS ACTION**

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

**DECLARATION OF HEATHER IJAMES  
IN SUPPORT OF MOTION TO SET ASIDE  
DEFAULT IN CROSS-COMPLAINT**

Date: September 26, 2014

Time: 10:00 a.m.

Place: 191 No. First St., Dept. 20  
San Jose, CA 95113

I, HEATHER A. IJAMES, declare as follows:

1. I am an adult over the age of eighteen years old and one of the attorneys for Cross-Defendants Charles Tapia and the Nellie Tapia Family Trust. I am familiar with this matter and if asked to testify, could and would truthfully as to the following matters.

2. Mr. Tapia, on behalf of himself and the Trust, came into our office on August 8, 2014 to seek setting aside the defaults.

3. After a search of court lodged documents online as they relate to the Antelope

1 Valley Groundwater Cases, I found the attorneys responsible for taking the defaults.

2 4. On August 14, 2014, I emailed Jeffrey Dunn of Best, Best and Krieger, as his  
3 name was prominent on the default documents. I received no response from this e-mail, nor did I  
4 receive an automated response indicating either the recipient was away or not reachable.

5 5. On August 22, 2014, I attempted to reach out to the other attorney whose name is  
6 on the default paperwork, Stephanie Hedlund, but discovered that Ms. Hedlund is not associated  
7 with Best, Best and Krieger any longer. On this same day, I sent Jeffrey Dunn another e-mail,  
8 again requesting he set aside the default. Mr. Dunn did not respond, nor did I receive an  
9 automated response indicating either the recipient was away or not reachable.

10 6. On August 25, 2014, I made a call to Best, Best and Krieger, specifically relaying  
11 to the secretary answering the phone that I needed to speak to Mr. Dunn before I filed a motion to  
12 set aside default. I was directed to Mr. Dunn's personal secretary and again relayed that I had  
13 been having difficulty in getting Mr. Dunn to respond to me, which was necessitating a motion.  
14 She personally represented that she would pass on my message to Mr. Dunn.

15 7. On August 26, 2014, I made yet another call to Best, Best and Krieger, asking the  
16 secretary who answered the phone to direct me to the attorney most responsible for discussing a  
17 default in the Antelope Valley Groundwater Cases, but also an attorney who would be able to  
18 return my call. I was yet again directed to Mr. Dunn, but got his voicemail. On this particular  
19 voicemail message, I relayed to Mr. Dunn of all my attempts to contact him, and also that this  
20 would be the last telephone call before I brought Mr. Tapia's motion. I did not receive a phone  
21 call back.

22 I declare under penalty of perjury under the laws of the State of California that the  
23 foregoing is true and correct and that this declaration was executed September 3, 2014 at  
24 Bakersfield, California.

25   
26 Heather A. James  
27  
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1  
2  
3 **PROOF OF SERVICE BY MAIL**

4 I am a citizen of the United States and employed in Kern County, California. I am over  
5 the age of eighteen years and not a party to the within-entitled action. My business address is  
6 2031 F Street Bakersfield, California 93301. I am readily familiar with this firm's practice for  
7 collection and processing of correspondence for mailing with the United States Postal Service.  
8 On September 4, 2014, I placed with this firm at the above address for deposit with the  
9 United States Postal Service a true and correct copy of the within document(s):

10 **DECLARATION OF HEATHER IJAMES IN SUPPORT OF MOTION TO  
11 SET ASIDE DEFAULT IN CROSS-COMPLAINT**

12 in a sealed envelope, postage fully paid, addressed as follows:

13 Jeffrey V. Dunn, Esq.  
14 Best Best & Krieger, LLP  
15 5 Park Plaza, Suite 1500  
16 Irvine, CA 92614

17 Following ordinary business practices, the envelope was sealed and placed for collection  
18 and mailing on this date, and would, in the ordinary course of business, be deposited with the  
19 United States Postal Service on this date.

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

22 Executed on September 4, 2014, at Bakersfield, California.

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Olga Lampkin