

RICHARDS, WATSON & GERSHON
A Professional Corporation
JAMES L. MARKMAN (43536) (jmarkman@rwglaw.com)
STEVEN R. ORR (136615) (sorr@rwglaw.com)
ERIN L. POWERS (245148) (epowers@rwglaw.com)
355 South Grand Avenue, 40th Floor
Los Angeles, California 90071-3101
Telephone: (213) 626-8484
Facsimile: (213) 626-0078

Attorneys for Defendant, Cross-Complainant,
and Cross-Defendant CITY OF PALMDALE

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

Coordination Proceeding
Special Title (Rule 1550(b)),

**ANTELOPE VALLEY
GROUNDWATER CASES**

Judicial Council Coordination Proceeding
No. 4408

Santa Clara Case No. 1-05-CV-049053
Assigned to The Honorable Jack Komar
Dept: D17

**CITY OF PALMDALE'S
CONSULTANT'S EXECUTED
CONFIDENTIALITY AGREEMENT**

Pursuant to the Protective Order Re Disclosure and Confidentiality of Well reports
dated March 8, 2007, the City of Palmdale hereby files the executed Confidentiality
Agreement of its consultant, Robert Beeby.

DATED: April 18, 2007

RICHARDS, WATSON & GERSHON
A Professional Corporation
JAMES L. MARKMAN
STEVEN R. ORR
ERIN L. POWERS

By: 

STEVEN R. ORR
Attorneys for Defendant, Cross-Complainant
and Defendant
CITY OF PALMDALE

CONFIDENTIALITY AGREEMENT PURSUANT TO PROTECTIVE ORDER

I certify that I have read and understand the confidentiality restrictions set forth in the Protective Order Re Disclosure and Confidentiality of Well Reports in the Antelope Valley Groundwater Cases (Judicial Council Coordination Proceeding #4408). I agree to comply with and be bound by the provisions of this Protective Order. I will not disclose confidential well completion reports or the data contained therein except as permitted in the Protective Order or as subsequently allowed by the Court. I will keep all copies of the well reports and data confidential and will not allow them to be disclosed to the general public. I will use the above well reports and data only for purposes of this litigation.

I hereby consent to the jurisdiction at the Los Angeles County Superior Court with respect to any proceedings to enforce the Protective Order and this Confidentiality Agreement. I understand that any violation of this Protective Order and this Confidentiality Agreement may subject me to appropriate sanctions, possibly including monetary sanctions and contempt of Court.

DATED: April 18, 2007


Robert Beeby

1 **PROOF OF SERVICE**

2 I, Kelley Herrington, declare:

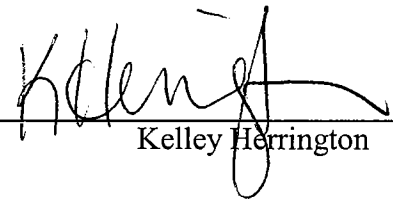
3 I am a resident of the State of California and over the age of eighteen years, and
4 not a party to the within action; my business address is Richards, Watson & Gershon, 355 South
5 Grand Avenue, 40th Floor, Los Angeles, California 90071. On April 18, 2007, I served the
6 within documents:

7 **CITY OF PALMDALE'S CONSULTANT'S EXECUTED**
8 **CONFIDENTIALITY AGREEMENT**

- 9 ☐ by causing facsimile transmission of the document(s) listed above from (213) 626-
10 0078 to the person(s) and facsimile number(s) set forth below on this date before
11 5:00 P.M. This transmission was reported as complete and without error. A copy
12 of the transmission report(s), which was properly issued by the transmitting
13 facsimile machine, is attached. Service by facsimile has been made pursuant to a
14 prior written agreement between the parties.
- 15 ☒ by posting the document(s) listed above to the Santa Clara County Superior Court
16 website in regard to the Antelope Valley Groundwater matter.
- 17 ☐ by placing the document(s) listed above in a sealed envelope and affixing a pre-
18 paid air bill, and causing the envelope to be delivered to an agent for delivery, or
19 deposited in a box or other facility regularly maintained by , in an envelope or
20 package designated by the express service carrier, with delivery fees paid or
21 provided for, addressed to the person(s) at the address(es) set forth below.
- 22 ☐ by personally delivering the document(s) listed above to the person(s) at the
23 address(es) set forth below.
- 24 ☐ by causing personal delivery by First Legal Support Services, 1511 West Beverly
25 Boulevard, Los Angeles, California 90026 of the document(s) listed above to the
26 person(s) at the address(es) set forth below.

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

Executed on April 18, 2007.

29 
Kelley Herrington