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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

Coordination Proceeding

Case No. 105 CV 049053

**ANTELOPE VALLEY
GROUNDWATER CASES**

Judicial Council Coordination Proceeding
No. 4408

Los Angeles County Waterworks District
No. 40 v. Diamond Farming Co.

The Honorable Jack Komar
Santa Clara Case No. Case No. 105 CV 049053

Los Angeles County Waterworks District
No. 40 v. Diamond Farming Co.

**MOTION IN LIMINE FOR ADMISSION
INTO EVIDENCE OF UNDISPUTED
PORTIONS OF STIPULATION AND
DECLARATION OF JANET K.
GOLDSMITH**

Wm. Bolthouse Farms, Inc. v. City of
Lancaster

Diamond Farming Co. v. City of
Lancaster

Riverside County Superior Court
Lead Case No. RIC 344436

Case No. RIC 344668

Case No. RIC 353840

Diamond Farming Co. v. Palmdale Water
District

Los Angeles Superior Court

Case No. BC 325201

Kern County Superior Court

Case No. S-1500-CV-254348

The City of Los Angeles, by and through its Department of Airports ("LAWA") moves
this Court for admission into evidence of paragraphs 61 through 63 of the Joint Stipulation
described below and of the Declaration of Vivian D. Howell ("Howell Declaration"), also

described below, with the exception of paragraphs 9 and 10 and Exhibit C thereof. The motion is made pursuant to the Fourth Amendment to the Case Management Order for Phase Four Trial and the authorities cited therein, and is based on this Notice of Motion and the Declaration of Janet K. Goldsmith.

ARGUMENT

1. **The Court's Case Management Order For Phase Four Trial, As Amended, Supports The Admission Into Evidence Of The Portions Of The Joint Stipulation And Howell Declaration Offered By LAWA.**

The Court previously entered Discovery Order No. 1 on December 12, 2012, requiring all parties to provide detailed and specific information concerning ownership of property, groundwater use, well locations, crop types, imported water claims, return flow claims and federal reserved right claims and to post the information on the Court's website by December 21, 2012. Subsequently, on January 17, 2013 the Court entered its First Amendment to the Case Management Order for Phase Four Trial, requiring the parties to set forth in a prescribed form of declaration ("Declaration") the information that had been produced in the response to the Discovery Order. The Court also set a date by which parties were required to file stipulations or objections to information in the Declarations. On April 30, 2013, the Court entered a Fourth Amendment to the CMO ("Fourth Amendment"). The Fourth Amendment provided that

If no objection or dispute is filed as to facts stated in a Stipulation, those facts will be treated in the same manner as facts stated in a Declaration, as set forth in paragraph 5 of this order. If a party objects to or disputes a fact stated in a Stipulation, the objecting party must also object to or dispute the facts stated in any related Declaration . . .

* * *

3. On or before 5:00 p.m. on May 3, 2013, all parties shall serve, by posting to the Court's website, a statement of any

1 objections or disputes they have to any or all facts stated in any
2 Stipulation or Declaration. The statement of objection and/or
3 dispute shall indicate by party and paragraph the statement of fact
4 being disputed, the basis of the objection and/or dispute . . . and
5 shall identify documents and witnesses known to the disputing
6 and/or objecting party that disputes, contradict or is inconsistent
7 with the disputed fact. If the evidence on which the objecting party
8 relies consists in whole or in part of documents, the objecting party
9 shall either identify the documents in its objection or serve copies
10 of those documents with the objection

11 Paragraph 4 to the Fourth Amendment required that objections be "specific; a broad or
12 general statement of objection or dispute without a specifically stated basis will be ineffective for
13 satisfying paragraph 3 of this order."

14 Finally, the Fourth Amendment ordered that

15 5. Any portion of a Stipulation or Declaration to which no
16 objection has been made by the time set forth in paragraph 3 hereof
17 will be accepted by the Court in the Phase Four trial as competent
18 evidence of the facts stated therein, without the necessity to call a
19 witness to establish the fact.

20 1. **The Material Sought To Be Admitted Into Evidence Establishes Ownership Of**
21 **Lands Overlying The Antelope Valley Groundwater Basin.**

22 In response to the Court's First Amendment to CMO, LAWA filed the Declaration of
23 Vivian D. Howell ("Howell Declaration") identifying the lands overlying the Antelope Valley
24 groundwater basin owned by the City of Los Angeles. A true copy of the Howell Declaration and
25 its attached Exhibits A, A-1 and B, offered for admission into evidence, are Exhibit A to the
26 Declaration of Janet K. Goldsmith accompanying this motion. LAWA also filed a Joint
27 Stipulation of Facts for Trial by Cross-Defendants State of California, LAWA, Antelope Valley –

1 East Kern Water Agency (Document No. 6077) filed on Court's website on February 27, 2013
2 ("Joint Stipulation"). Paragraphs 61 through 63 of the Joint Stipulation identified, by reference to
3 the Howell Declaration and its exhibits, the land owned by LAWA overlying the Antelope Valley
4 groundwater basin. A true copy of the Joint Stipulation's cover page and paragraphs 61 through
5 63 are Exhibit B to the Declaration of Janet K. Goldsmith accompanying this motion.

6 **2. No Party Has Made An Effective Objection To The Material Sought To Be Admitted**
7 **Into Evidence.**

8 No specific objection has been made to paragraphs 61 through 63 of the Joint Stipulation
9 by any party.

10 A group of overlying landowner parties¹ filed Objections to 4th Amendment to CMO for
11 Phase 4 and Declarations and Stipulations Pursuant thereto, (Document No. 6541 on the Court's
12 website) ("Landowner Objections"), which included objection to the Joint Stipulation. The
13 objection was made "on the grounds specified in AGWA's March 22, 2013 Objection to the Joint
14 Stipulation of Facts. . ." AGWA had objected to LAWA's portion of the Joint Stipulation,
15 specifically paragraph 64, because, AGWA incorrectly claimed, it did not identify the lessees of
16 LAWA property, and did not clarify whether the lessees were claiming groundwater rights.
17 AGWA did not object to the portion of the Joint Stipulation or to the portion of the Declaration of
18 Vivian Howell establishing LAWA's ownership of the parcels identified in the Howell
19 Declaration, and the Landowner Objections do not, therefore, raise any dispute concerning the
20 fact of LAWA ownership of land nor of the identification of parcels to which LAWA claims
21 ownership.

22 The Public Water Suppliers², through their Objections to Declarations and Stipulations in
23 Phase IV, filed May 3, 2013, did "generally object to these declarations [of Vivian Howell and
24 Robert Wagner] in their entirety." (Emphasis added.) This objection, however, is irreconcilable

25 ¹ Bolthouse Properties, LLC; Wm. Bolthouse Farms, Inc.; Diamond Farming Company, Crystal Organic
26 Farms, Grimmway Enterprises, LAPIS Land Company, LLC; Tejon Ranchcorp, Tejon Ranch Company and Granite
Construction Company; U.S. Borax, Inc.; Antelope Valley Groundwater Agreement Association ("AGWA")

27 ² Los Angeles Waterworks District No. 40, City of Palmdale, Rosamond Community Services District, City
28 of Lancaster, Littlerock Creek Irrigation District, Palm Ranch Irrigation District, Palmdale Water District, Quartz Hill
Water District, City of Palmdale, and California Water Service Company.

1 with the requirement of paragraph 3 of the Fourth Amendment that objections be specifically
2 stated with reference to the paragraphs being objected to and state the basis of the objection.

3 Under paragraph 4 of the Fourth Amendment the Public Water Supplier's statement of
4 general objection is wholly ineffective to support a valid objection.

5 As mentioned in the 4th Amendment to the CMO,

6 It is ... well established that courts have fundamental inherent
7 equity, supervisory, and administrative powers, as well as inherent
8 power to control litigation before them. In addition to their inherent
9 equitable power derived from the historic power of equity courts,
10 *all courts have inherent supervisory or administrative powers*
11 *which enable them to carry out their duties, and which exist apart*
12 *from any statutory authority.* It is beyond dispute that 'Courts have
13 inherent power ... to adopt any suitable method of practice, both in
14 ordinary actions and special proceedings, if the procedure is not
15 specified by statute or by rules adopted by the Judicial Council.'
16 That inherent power entitles trial courts to exercise reasonable
17 control over all proceedings connected with pending litigation ... in
18 order to insure the orderly administration of justice. Courts are not
19 powerless to formulate rules of procedure where justice demands it.
(*Rutherford v. Owens-Illinois, Inc.* (1997) 16 Cal.4th 953, 967, 67
Cal.Rptr.2d 16, 941 P.2d 1203, italics added.)

20 (*In re Reno* (2012) 55 Cal.4th 428, 522.)(Internal citations omitted.)

21 The Court's inherent power to institute orderly procedures and requirements is also well
22 established in complex litigation where the determination of issues "often imposes enormous
23 burdens on trial courts, in terms of the time and resources that are required to be expended. . . ."
24 (See *First State Ins. Co. v. Superior Court*, (2000) 79 Cal.App.4th 324, 336.)

25 The Public Water Supplier's Objection must be rejected. Interposing a "general" objection
26 wholly fails to fulfill any requirement under paragraph 3 and thus the objection must be
27 disregarded by this Court for failure to comply with the 4th Amendment to the CMO.

1 **3. Paragraphs 61 Through 63 Of The Joint Stipulation, And Paragraphs 1 Through 8**
2 **Of The Howell Declaration, Together With Exhibits A, A-1 And B Thereof, Should**
3 **Be Admitted Into Evidence.**

4 Accordingly, LAWA moves that paragraphs 61 through 63 of the Joint Stipulation and
5 that the Declaration of Vivian D. Howell, with the exception of paragraphs 9 and 10 thereof³,
6 together with its Exhibits A, A-1 and B, be admitted into evidence for the purpose of establishing
7 LAWA's ownership of land overlying the groundwater basin.

8 DATED: May 23, 2013

CARMEN A. TRUTANICH, Los Angeles City Attorney
RICHARD M. BROWN, General Counsel, Water and
Power
RAYMOND ILGUNAS, General Counsel, Los Angeles
World Airports

KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD,
Professional Corporation

12
13 By 
14 Janet K. Goldsmith
15 Attorneys for Cross-Defendant CITY OF LOS
16 ANGELES and LOS ANGELES WORLD
17 AIRPORTS

27 _____
28 ³ Paragraphs 9 and 10 of the Howell Declaration identify portions of the LAWA property that have been
 leased, and Exhibit C to the Declaration consists of the leases. This motion does not seek their admission.
 1027530.1 1351.7

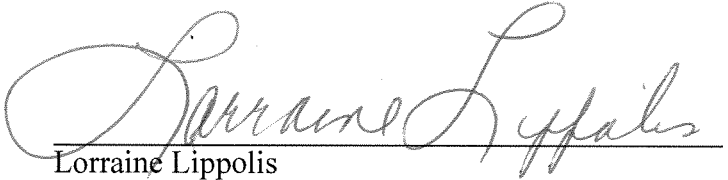
PROOF OF SERVICE

I DECLARE THAT:

I am employed in the County of Sacramento, State of California. I am over the age of eighteen years and not a party to the within action. My business address is 400 Capitol Mall, 27th Floor, Sacramento, California 95814.

On May 23, 2013, I served the attached **MOTION IN LIMINE TO SUBMIT DECLARATION OF VIVIAN HOWELL INTO EVIDENCE and DECLARATION OF JANET K. GOLDSMITH** by posting the document to the Santa Clara Superior Court website www.scefiling.org. in regard to the Antelope Valley Groundwater matter.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct and that this document was executed on May 23, 2013.


Lorraine Lippolis

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EXHIBIT A to
DECLARATION OF JANET K. GOLDSMITH

JANET K. GOLDSMITH, State Bar No. 065959
DANIELLE R. TEETERS, State Bar No. 210056
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Los Angeles, CA 90045-5803
Attorneys for Cross-Defendant CITY OF LOS ANGELES and
LOS ANGELES WORLD AIRPORTS

Exempt from Filing Fee Pursuant to
Government Code Section 6103

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

Coordination Proceeding

Case No. 105 CV 049053

**ANTELOPE VALLEY
GROUNDWATER CASES**

Judicial Council Coordination Proceeding
No. 4408

Los Angeles County Waterworks District
No. 40 v. Diamond Farming Co.

The Honorable Jack Komar
Santa Clara Case No. Case No. 105 CV 049053

Los Angeles County Waterworks District
No. 40 v. Diamond Farming Co.

**DECLARATION OF VIVIAN D. HOWELL
IN LIEU OF DEPOSITION TESTIMONY
FOR PHASE 4 TRIAL FILED IN SUPPORT
OF THE CITY OF LOS ANGELES'S
APPLICATION FOR WATER RIGHTS
AND EXHIBITS**

Wm. Bolthouse Farms, Inc. v. City of
Lancaster

Diamond Farming Co. v. City of
Lancaster

Riverside County Superior Court

Lead Case No. RIC 344436

Case No. RIC 344668

Case No. RIC 353840

Los Angeles Superior Court

Case No. BC 325201

Kern County Superior Court

Case No. S-1500-CV-254348

Diamond Farming Co. v. Palmdale Water
District

Date: January 16, 2013

1 I. DECLARATION

2 I, Vivian D. Howell declare:

3 1. I am the Manager of the Commercial Development Real Estate and Property
4 Management – LAX Non-Airfield and Palmdale with the City of Los Angeles, Department of Airports,
5 Los Angeles World Airports (“LAWA”). I have been employed by the City of Los Angeles since
6 1983. I was employed with LAWA in 1998 for one year and currently from 2000 to the present.
7 The information contained herein is based on information and belief after my review of
8 documents attached hereto, independent investigation as to the matters raised herein, and based
9 on my 14 years of experience with LAWA. In lieu of deposition testimony for the Phase 4 trial, I
10 am providing this declaration. If called upon to testify, I could and would competently testify to
11 the matters contained herein. I have been authorized to make this declaration on behalf of the
12 City of Los Angeles and the Los Angeles World Airports.

13 II. PROPERTY OWNERSHIP AND PARCEL SIZE

14 2. LAWA owns approximately 27 square miles of land (approximately 17,750 acres)
15 that overlies the Antelope Valley Area of Adjudication as decided by this Court. LAWA claims
16 overlying groundwater rights as to this land. All of the twelve- hundred plus contiguous parcels
17 owned by LAWA are identified and recorded in the Assessor’s tax rolls by Assessor’s
18 Identification Numbers (“AINS”). The land is in Los Angeles County and is identified by AIN in
19 **Exhibit A**. A true and correct copy of Exhibit A is attached hereto and is incorporated herein.

20 3. In addition to the land identified by the Assessor’s Identification Numbers shown
21 in Exhibit A hereto, the City of Los Angeles owns parcels within the Antelope Valley on which
22 its Los Angeles Aqueducts and related appurtenances are located. No claim of groundwater
23 rights is made for such parcels, and they are not, therefore, enumerated in Exhibit A.

24 4. A list of the parcels that have changed ownership since 1999, showing both the
25 Assessor’s Identification Number for the parcel under prior ownership and what is believed to be
26 the Assessor’s Identification Number for LAWA ownership of the parcel is attached hereto as
27 **Exhibit A-1**. A true and correct copy of Exhibit A-1 is attached hereto and is incorporated
28 herein.

1 5. Exhibit B to this declaration consists of a parcel map and Record of Survey
2 depicting the location of the property owned by the City of Los Angeles as identified by the
3 Assessor's Identification Numbers in Exhibits A and A-1. A true and correct copy of Exhibit B is
4 attached hereto and is incorporated herein.

5 6. LAWA claims overlying groundwater rights as to the properties listed in
6 Paragraph 2 and Exhibits A and A-1.

7 7. LAWA is the record title owner of the Assessor's Identification Numbered parcels
8 set forth in Exhibits A and A-1.

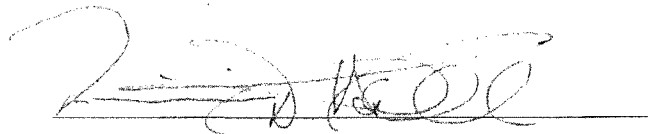
9 8. LAWA is the only entity appearing on the title for the APN/AINS listed in Exhibit
10 A from Jan 1, 2000 to the present. The ownership of the lands listed in Exhibit A-1 is delineated
11 therein.

12 III. LEASES

13 9. Attached hereto as **Exhibit C** is a list of persons or entities that leased portions of
14 the property owned by LAWA listed in Exhibits A and A-1, the AIN numbers associated with the
15 leases, an estimate of the acreage leased, and the effective date of the leases. A true and correct
16 copy of the leases are attached to Exhibit C in the order listed.

17 10. The leases allow for the use of water only on the leased property by the lessees.
18 None of the leases permit the export or sale of extracted groundwater.
19

20 I declare under penalty of perjury under the laws of the State of California that the
21 foregoing is true and correct. Executed at Los Angeles, California on this 31st day of January,
22 2013.

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25 Vivian D. Howell
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PROOF OF SERVICE

I DECLARE THAT:

I am employed in the County of Sacramento, State of California. I am over the age of eighteen years and not a party to the within action. My business address is 400 Capitol Mall, 27th Floor, Sacramento, California 95814.

On January 31, 2013, I served the attached DECLARATION OF VIVIAN D. HOWELL IN LIEU OF DEPOSITION TESTIMONY FOR PHASE 4 TRIAL FILED IN SUPPORT OF THE CITY OF LOS ANGELES'S APPLICATION FOR WATER RIGHTS AND EXHIBITS by posting the document to the Santa Clara Superior Court website www.scefiling.org. in regard to the Antelope Valley Groundwater matter.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct and that this document was executed on January 31, 2013.

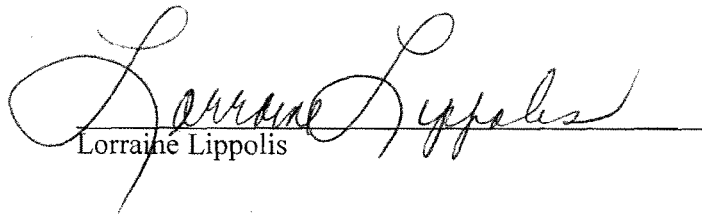

Lorraine Lippolis

EXHIBIT A

LAWA-VH DECL-0001

MAPBOOK	PAGE	PARCEL
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3022	014	274
3022	031	272
3022	014	279
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3388	006	273
3388	006	274
3388	006	275
3388	004	294
8920	851	378
8920	851	380

Number of Parcels = 1,263 (does not include the 15 privately owned properties listed below)

Known Privately Owned Parcels at Palmdale

3024	017	002
3024	018	001
3024	018	003
3024	018	008
3024	018	009
3024	018	010
3025	001	051
3025	043	283
3025	045	008
3028	007	029
3077	001	055
3077	009	057
3077	009	100
3170	031	004
3380	009	032
3399	001	005

EXHIBIT A-1

LAWA-VH DECL-0027

CONFIDENTIAL
Final Los Angeles PMD Eminent Domain Acquisitions
2008

APNs and Sellers on Acquired 15 PMD Parcels from 2004/5 to 2009			
Item	Seller's APN (known to be correct)	LAWA's New APN (may have changed)	Seller
1	3024-017-002	3024-017-281	Peterson
2	3024-018-001	3024-018-281	Liscuna Trust, et al
3	3024-018-003	3024-018-282	
4	3024-018-008	3024-018-283	Aquino
5	3024-018-009	3024-018-284	Frake, et al
6	3024-018-010	3024-018-280	Edenkamp
7	3025-001-051	3025-001-295	Leonards Bakery
8	3025-045-008	3025-045-299	Norman
9	3028-007-029	3028-007-281	Morse
10	3077-009-100	3077-009-274 OR 3077-10-281	Pedro Valley Investors
11	3077-001-055	3077-001-297	Teran
12	3077-009-057	3077-009-299	Montgomery
13	3380-009-032	3388-009-293	Chavez
14	3388-001-005	3388-001-293	Lanzano
15	3025-043-283	3025-043-283	Summers

Exhibit A-1 to City of Los Angeles' Response to Discovery Order

EXHIBIT B

LAWA-VH DECL-0029

EXHIBIT B

Page 7 of 66 of Parcel Map 24419 and Record of Survey

EXHIBIT B - TO CITY OF LOS ANGELES' RESPONSE TO DISCOVERY ORDER

LAWA-VH DECL-0030

SCALE - 1"=2500'

SHEET 7 OF 68 SHEETS

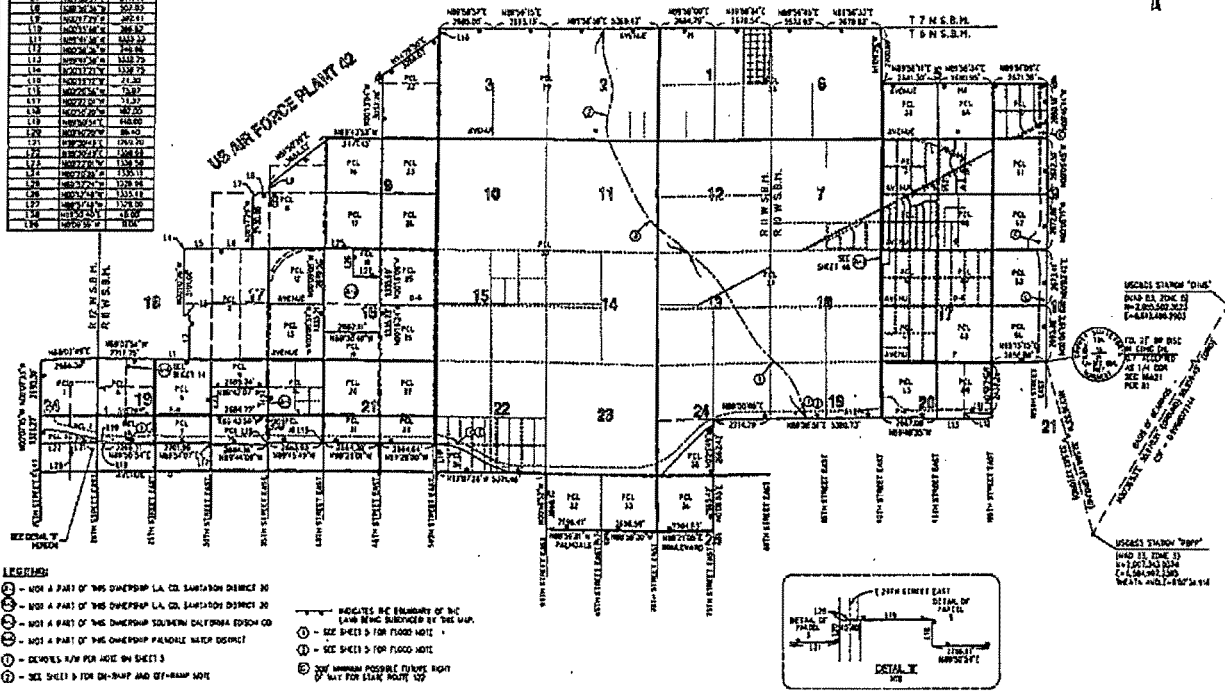
PARCEL MAP NO. 24419

PARTLY IN THE CITY OF PALMDALE AND PARTLY IN THE UNINCORPORATED TERRITORY OF THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA

BOUNDARY SHEET

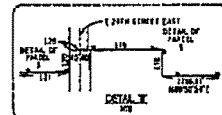
THE MAP

106	1060000	1060000
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134	1060000	1060000
135	1060000	1060000
136	1060000	1060000
137	1060000	1060000
138	1060000	1060000
139	1060000	1060000
140	1060000	1060000



- LEGEND
- ① - NOT A PART OF THIS OWNERSHIP L.A. CO. SANITATION DISTRICT 20
 - ② - NOT A PART OF THIS OWNERSHIP L.A. CO. SANITATION DISTRICT 20
 - ③ - NOT A PART OF THIS OWNERSHIP SOUTHERN CALIFORNIA Edison CO
 - ④ - NOT A PART OF THIS OWNERSHIP PALMDALE WATER DISTRICT
 - ⑤ - DEMONSTRATES A/R FOR NOTE ON SHEET 3
 - ⑥ - SEE SHEET 3 FOR DE-SHAP AND UT-RAMP NOTE

- INDICATES THE BOUNDARY OF THE LAND BEING SUBDIVIDED BY THIS MAP
- ① - SEE SHEET 3 FOR FLOOD NOTE
- ② - SEE SHEET 3 FOR FLOOD NOTE
- ③ - SEE SHEET 3 FOR FLOOD NOTE
- ④ - SEE SHEET 3 FOR FLOOD NOTE
- ⑤ - SEE SHEET 3 FOR FLOOD NOTE
- ⑥ - SEE SHEET 3 FOR FLOOD NOTE



ENGINEER'S TO CITY OF LOS ANGELES RESPONSE TO DISCOVERY ORDER

RECORD OF SURVEY

PARTLY IN THE CITY OF PALMDALE AND PARTLY IN
THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA
BEING A SURVEY OF ALL OR PORTIONS OF SECTION 24, T. 6 N., R. 12 W., S.B.M.,
SECTIONS 1, 2, 3, 4, 5, 6, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23,
24, 25, 26, T. 6 N., R. 11 W., S.B.M.,
SECTIONS 4, 5, 6, 7, 8, 9, 16, 17, 18, 19, 20, T. 6 N., R. 10 W., S.B.M.
HALL & FOREMAN, INC. STEVE SHAMBECK, L.S. 6217
NOVEMBER 2005

COUNTY SURVEYOR'S STATEMENT

THIS MAP HAS BEEN EXAMINED IN ACCORDANCE WITH
SECTION 8364 OF THE PROFESSIONAL LAND SURVEYORS
ACT THIS DAY OF 2006.
COUNTY SURVEYOR.

BY _____
DEPUTY COUNTY SURVEYOR

SURVEY PURPOSE

THIS RECORD OF SURVEY WAS PREPARED IN CONFORMANCE
WITH SECTION 8362 (a)(1), (a)(2), (a)(3) OF THE BUSINESS
& PROFESSIONS CODE.

BASIS OF BEARINGS

THE BASIS OF BEARINGS FOR THIS SURVEY IS THE CALIFORNIA
COORDINATE SYSTEM (NAD 83), ZONE 10, AS DETERMINED LOCALLY
BY THE LINE BETWEEN USACE STATIONS CHMS AND PBRP,
SHOWN HEREIN AS: N00°04'53"E.

DATUM STATEMENT

COORDINATES SHOWN ARE BASED ON THE CALIFORNIA COORDINATE
SYSTEM OF 1983, ZONE 10, CA-IPED, EPOCH 2004.0.
ALL DISTANCES SHOWN ARE GRAUND, UNLESS OTHERWISE NOTED. TO
OBTAIN GRID DISTANCES MULTIPLY GRAUND DISTANCE BY 0.99980777.

SURVEYOR'S STATEMENT

THIS MAP CORRECTLY REPRESENTS A SURVEY MADE BY
ME OR UNDER MY DIRECTION IN CONFORMANCE WITH THE
REQUIREMENTS OF THE PROFESSIONAL LAND SURVEYOR'S
ACT AT THE REQUEST OF THE CITY OF LOS ANGELES
DEPARTMENT OF AIRPORTS DURING JULY AND AUGUST, 2005.

STEVE SHAMBECK, P.L.S. 6217
LICENSE EXPIRES 03/31/08

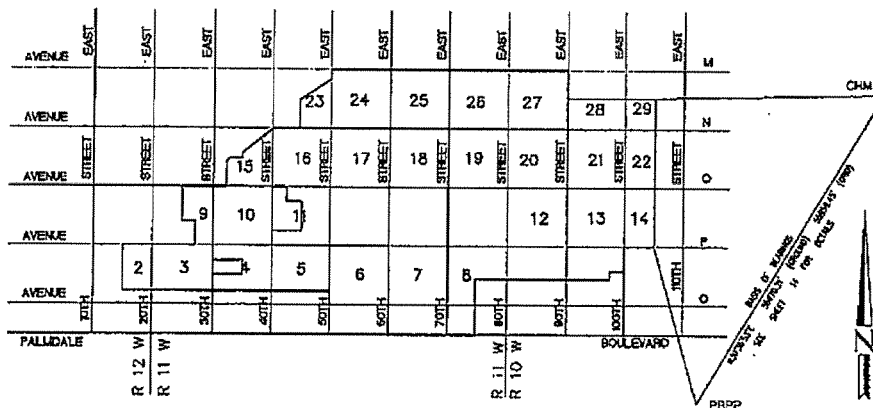


NOTES

1. ALL FOUND OR SET MONUMENTS ARE AS NOTED ON THE
INDIVIDUAL MAP SHEETS.
2. THE NOTE "DNF" INDICATES CORNERS WHERE MONUMENTS
WERE SEARCHED FOR BUT NOT FOUND.
3. "R" INDICATES RECORD FOR RECORD OF SURVEY 02/27-48.
4. "D.S.A." INDICATES "DEPARTMENT OF AIRPORTS".
5. "R" INDICATES RECORD FOR RECORD OF SURVEY 02/27-48.
6. INDICATES FOUND MONUMENT AS NOTED.
7. INDICATES SET 2" IR, 3/4" LONG, FLUSH, WITH TAG
"LS 6217", UNLESS OTHERWISE NOTED.

SHEET INDEX

NOT TO SCALE



JOB NO. 04306-000
PLOT FILE NO. 00000

SCALE
1"=400'

SHEET 2 OF 20

RECORD OF SURVEY

PARTLY IN THE CITY OF PALMDALE AND PARTLY IN
THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA

HALL & FOREMAN, INC.

STEVE SHAMBECK, L.S. 6217

NOVEMBER 2005

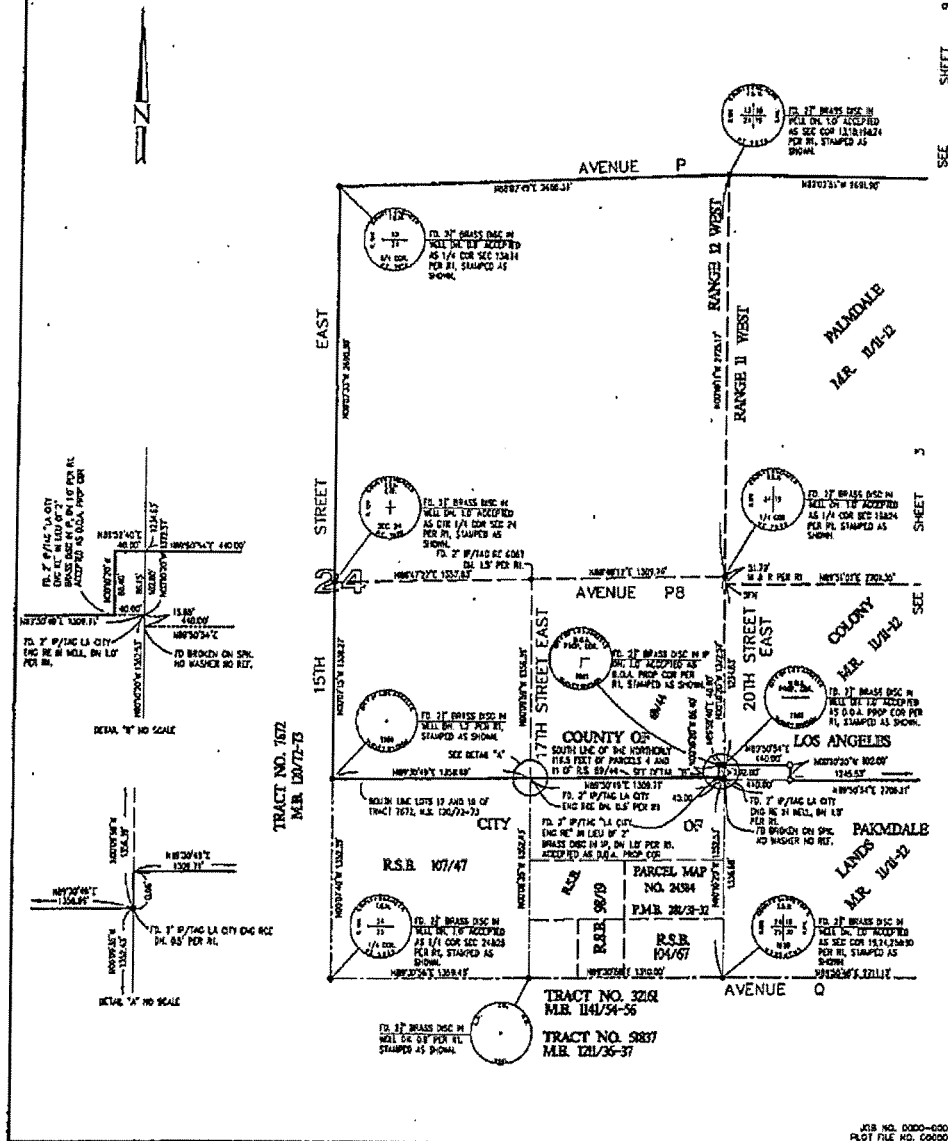


EXHIBIT 9- TO CITY OF LOS ANGELES' RESPONSE TO DISCOVERY ORDER

LAWA-VH DECL-0033

SCALE
1"=400'

SHEET 3 OF 29

RECORD OF SURVEY

PARTLY IN THE CITY OF PALMDALE AND PARTLY IN
THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA

HALL & FOREMAN, INC.

STEVE SHAMBECK, L.S. 6217

NOVEMBER 2005

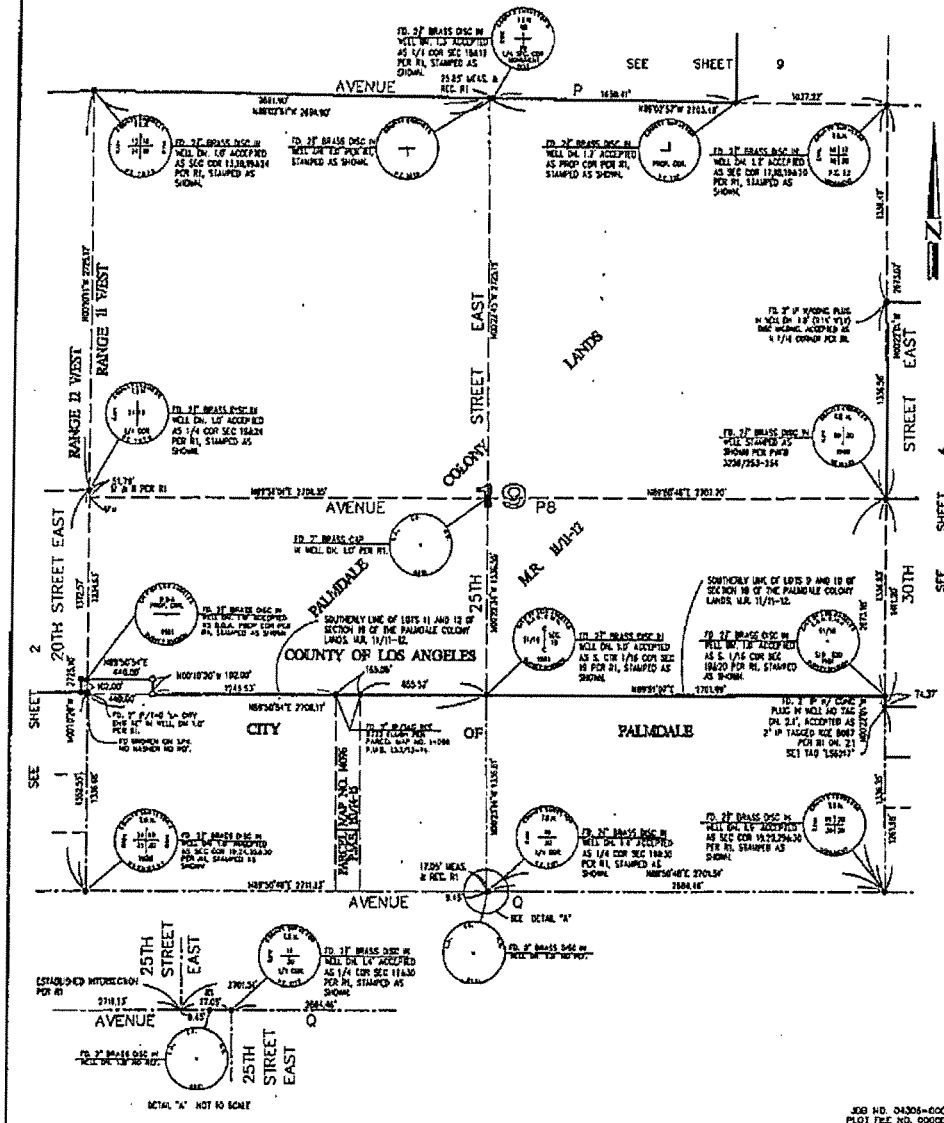


EXHIBIT B - TO CITY OF LOS ANGELES RESPONSE TO DISCOVERY ORDER

LAWA-VH DECL-0034

SHEET 4 OF 29

PARTLY IN THE CITY OF PALMDALE AND PARTLY IN
THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA
HALL & FOREMAN, INC. STEVE SHAMBECK, L.S. 6217
NOVEMBER 2005

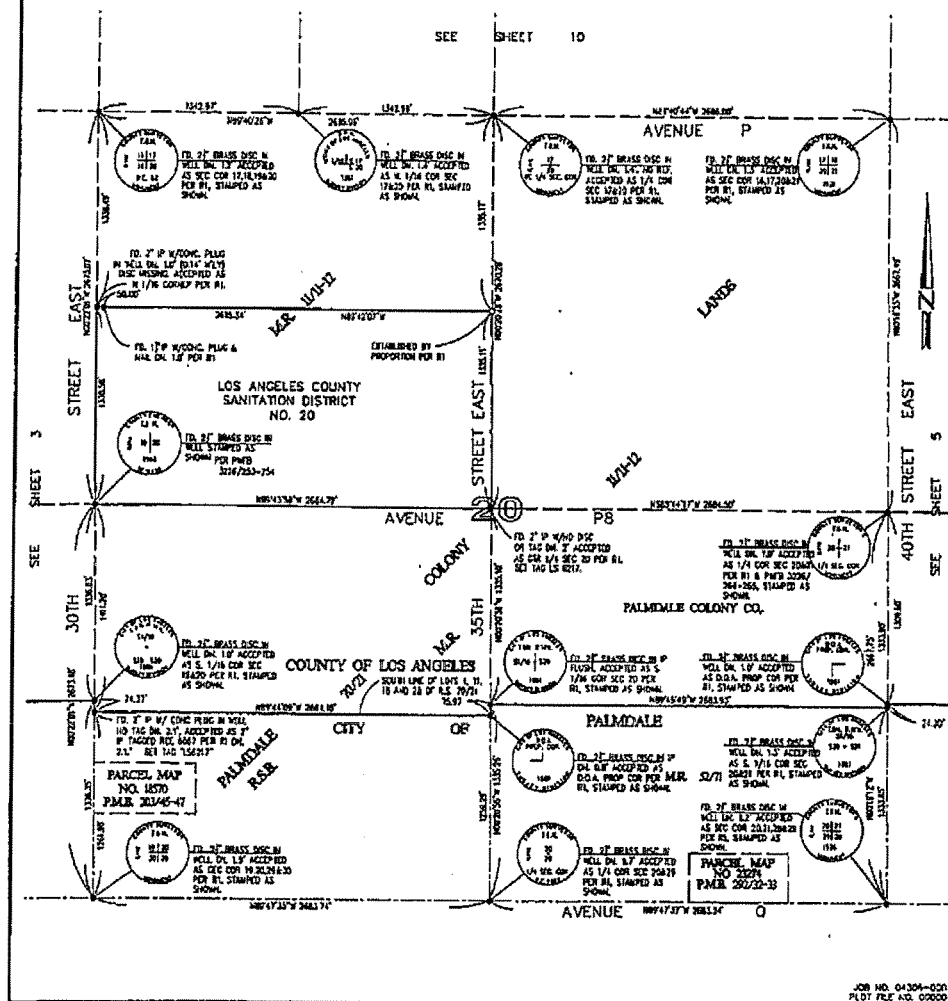


EXHIBIT B - TO CITY OF LOS ANGELES' RESPONSE TO DISCRIMINATORY CHARGE

LAWA-VH DECL-0035

SHEET 5 OF 29

PARTLY IN THE CITY OF PALMDALE AND PARTIALLY IN
THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA
HALL & FOREMAN, INC. STEVE SHAMBECK, L.S. 8217
NOVEMBER 2005

SEE SHEET 11

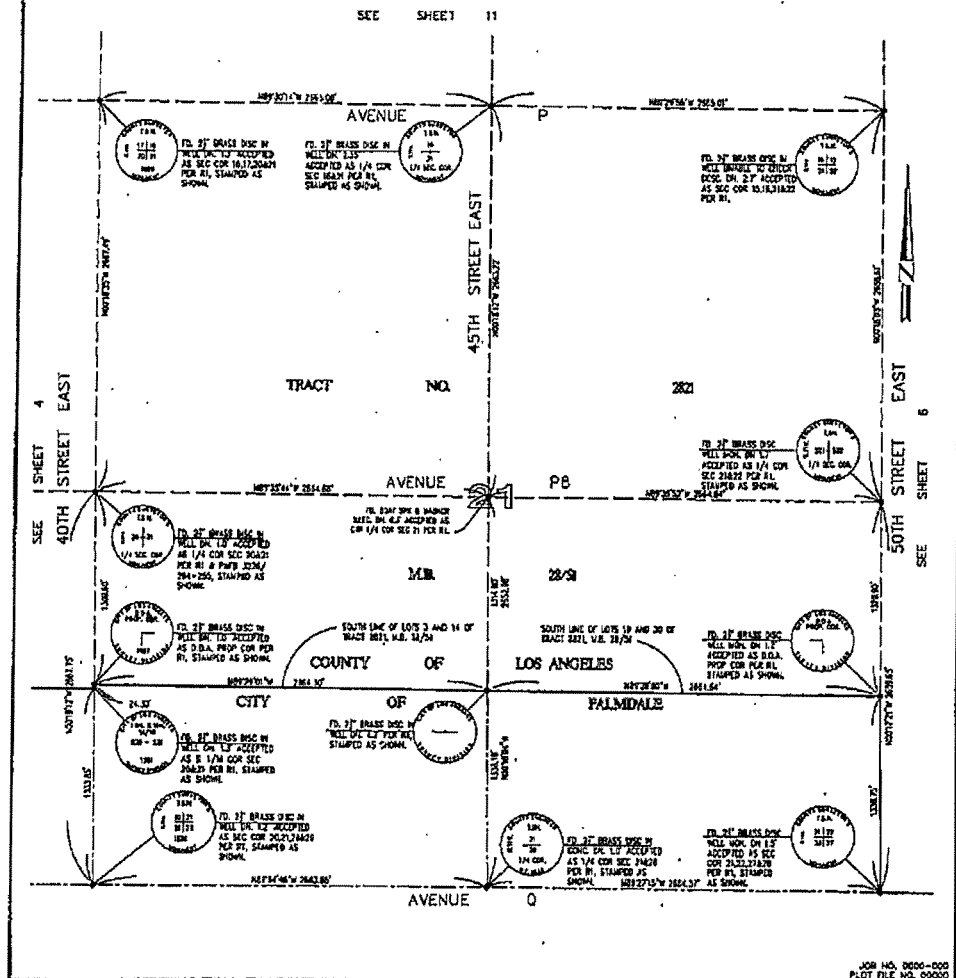


EXHIBIT B - TO CITY OF LOS ANGELES: RESPONSE TO DISCOVERY ORDER

LAWA-VH DECL-0036

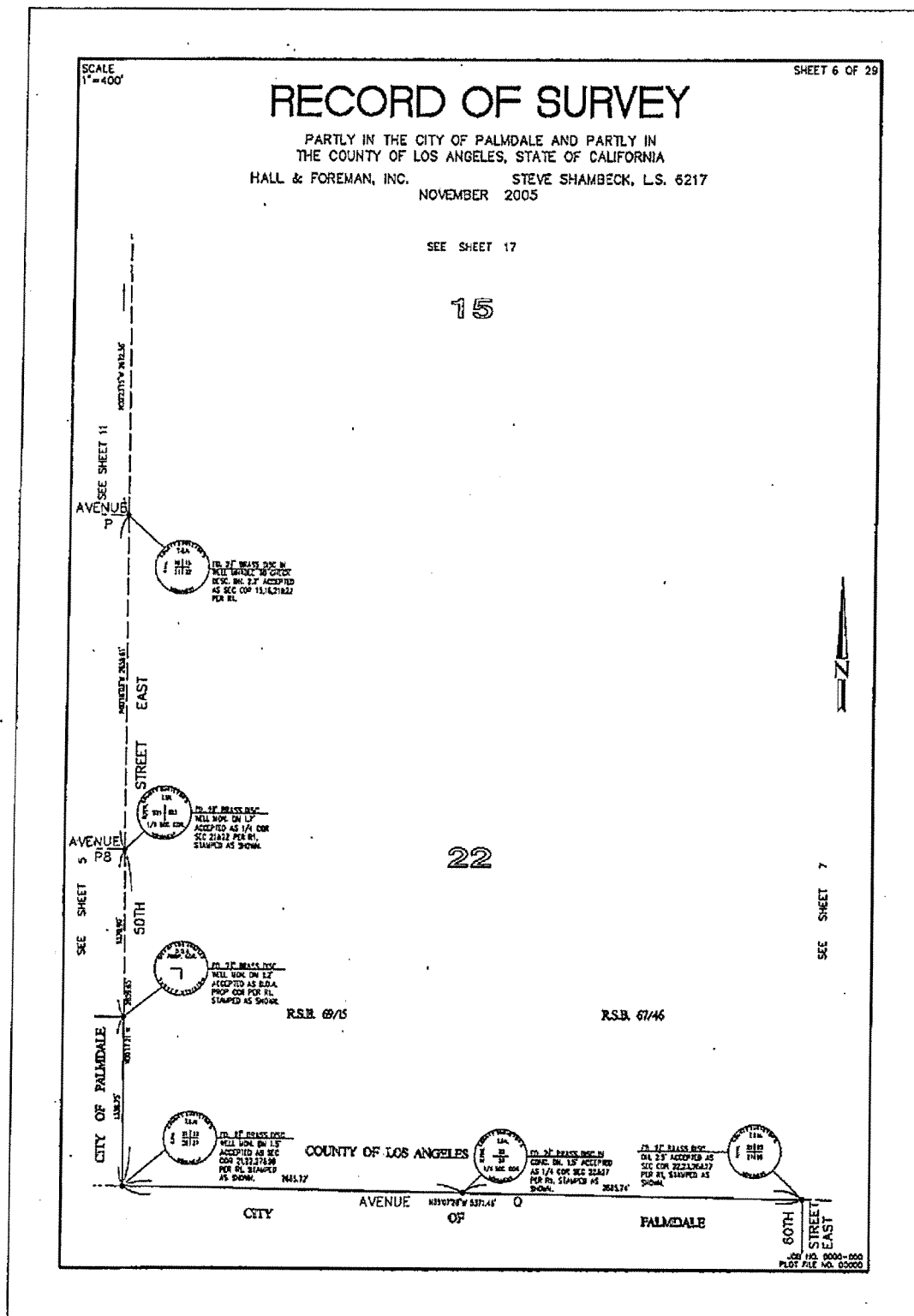


EXHIBIT B - TO CITY OF LOS ANGELES' RESPONSE TO DISCOVERY ORDER

LAWA-VH DECL-0037

SHEET 7 OF 29

PARTLY IN THE CITY OF PALMDALE AND PARTLY IN
THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA

SEE SHEET 18

FD. 37 BRASS DISC IN
WELL ON RD. ACQUIRED AT
1/4 COR SEC 12, T4, R36E
PER CS 8726. STAMPED AS
SHOWN.

FD 217 BEARS DOG H.
WELL ON 22 ACCEPTED
AS 1/4 DOB SEC 2342
PER US 8730, STAMPED
AS SHOWN

FD-37 UNCLAS DISC IN
CELL ONE, TWO ACCEPTED
AS DEC COR
23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 8

FD. 27 BRASS DISC W
HOLE DR. L.S. ACCEPTED
AS 1/1 COR SEC 25426
PER RL, STAMPED AS
25426.

FD. 27 BRASS DISC W
HOLE DR. L.S. ACCEPTED
AS 1/1 COR SEC 25426
PER RL, STAMPED AS
25426.

FD. 27 BRASS DISC W
HOLE DR. L.S. ACCEPTED
AS 1/1 COR SEC 25426
PER RL, STAMPED AS
25426.

FD. 27 BRASS DISC W
HOLE DR. L.S. ACCEPTED
AS 1/1 COR SEC 25426
PER RL, STAMPED AS
25426.

FD. 27 BRASS DISC W
HOLE DR. L.S. ACCEPTED
AS 1/1 COR SEC 25426
PER RL, STAMPED AS
25426.

JOB NO. 0000-000
PLOT FILE NO. 00000

EXHIBIT B - TO CITY OF LOS ANGELES' RESPONSE TO DISCOVERY ORDER

PARTLY IN THE CITY OF PALMDALE AND PARTLY IN
THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA

HALL & FOREMAN, INC. STEVE SHAMBECK, L.S. 6217
NOVEMBER 2005

SEE SHEET 19

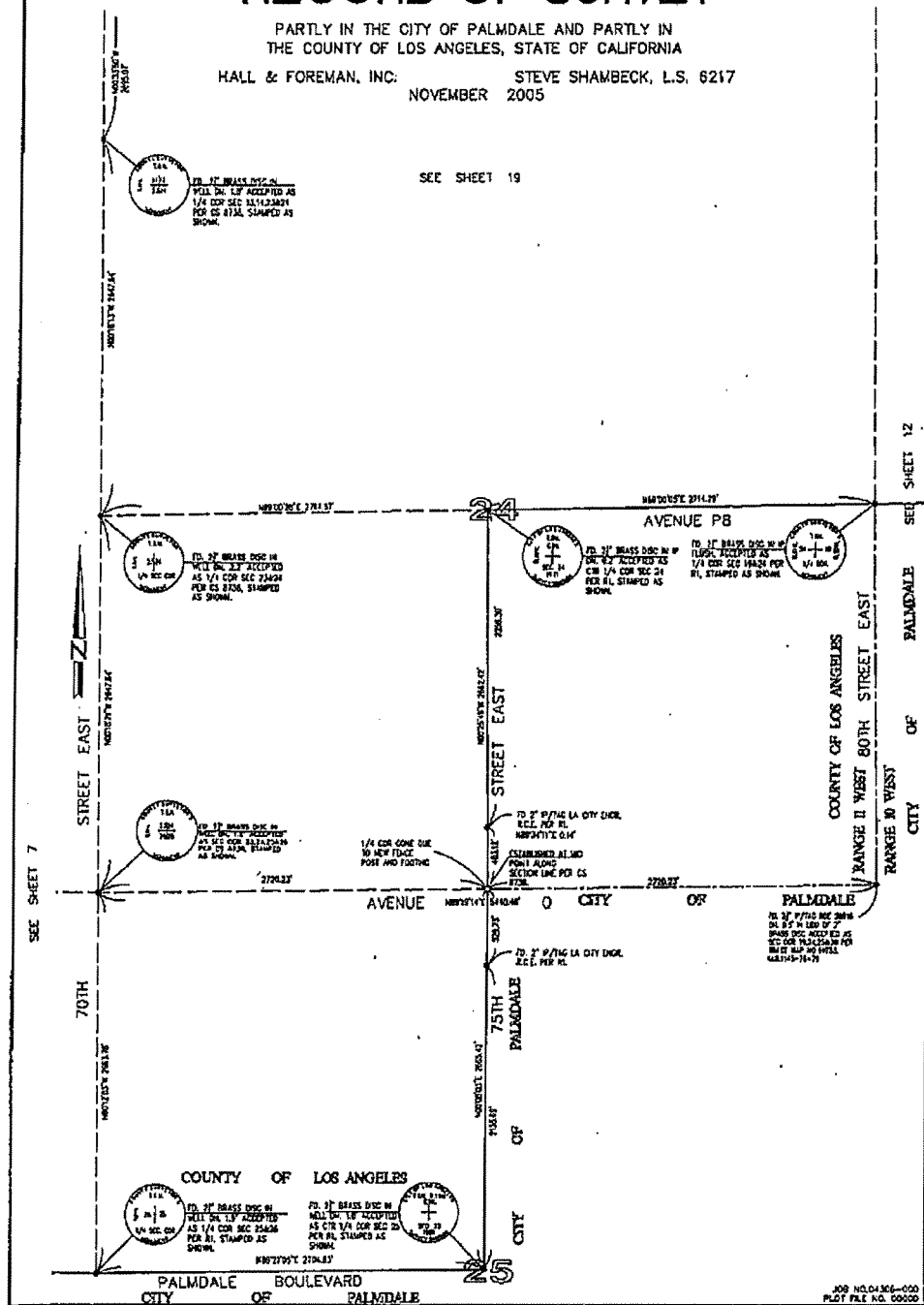


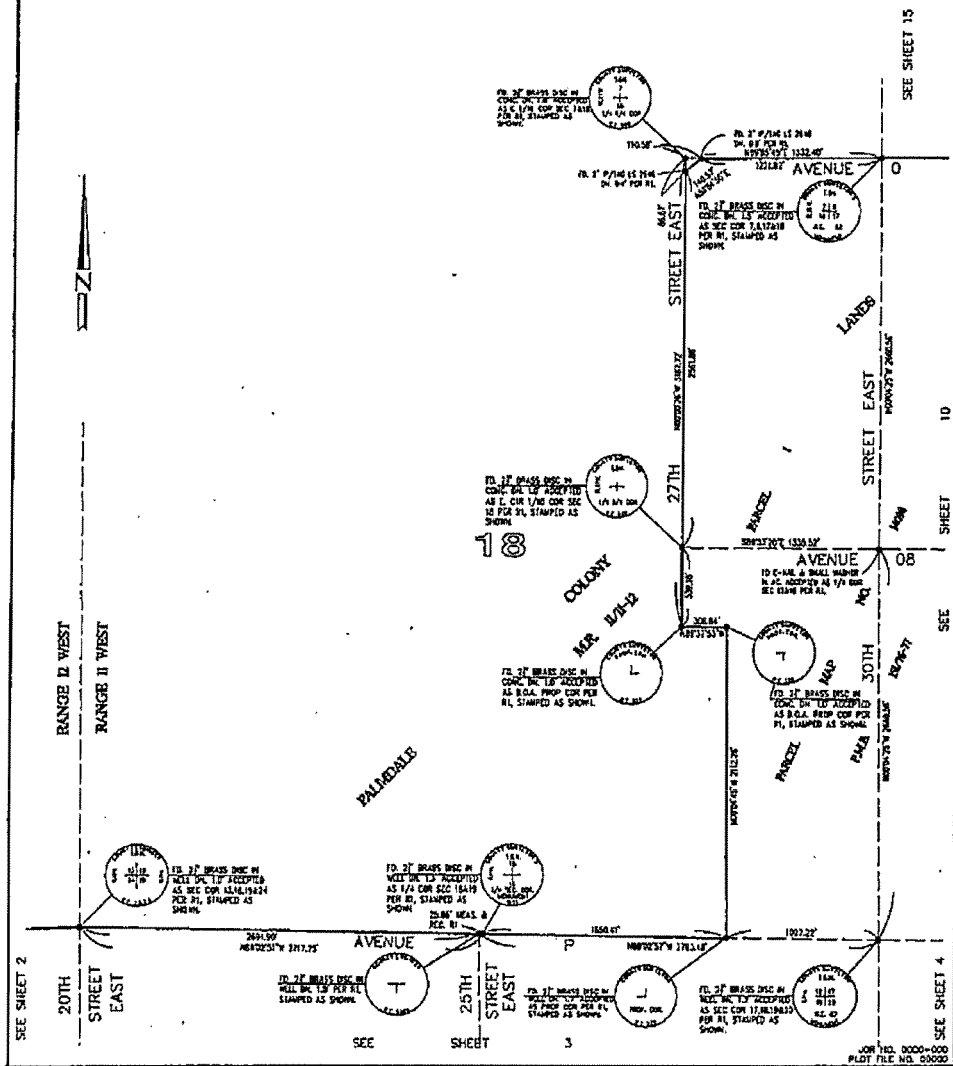
EXHIBIT B - TO CITY OF LOS ANGELES' RESPONSE TO DISCOVERY ORDER

SCALE
1"=400'

SHEET 9 OF 29

RECORD OF SURVEY

PARTLY IN THE CITY OF PALMDALE AND PARTLY IN
THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA
HALL & FOREMAN, INC. STEVE SHAMBECK, L.S. 5217
NOVEMBER 2005



ENH-119-TO CITY OF LOS ANGELES RESPONSE TO DISCOVERY ORDER

LAWA-VH DECL-0040

SCALE
1"=40'

SHEET 10 OF 29

RECORD OF SURVEY

PARTLY IN THE CITY OF PALMDALE AND PARTLY IN
THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA

HALL & FOREMAN, INC.

STEVE SHAMBECK, L.S. 6217

NOVEMBER 2005

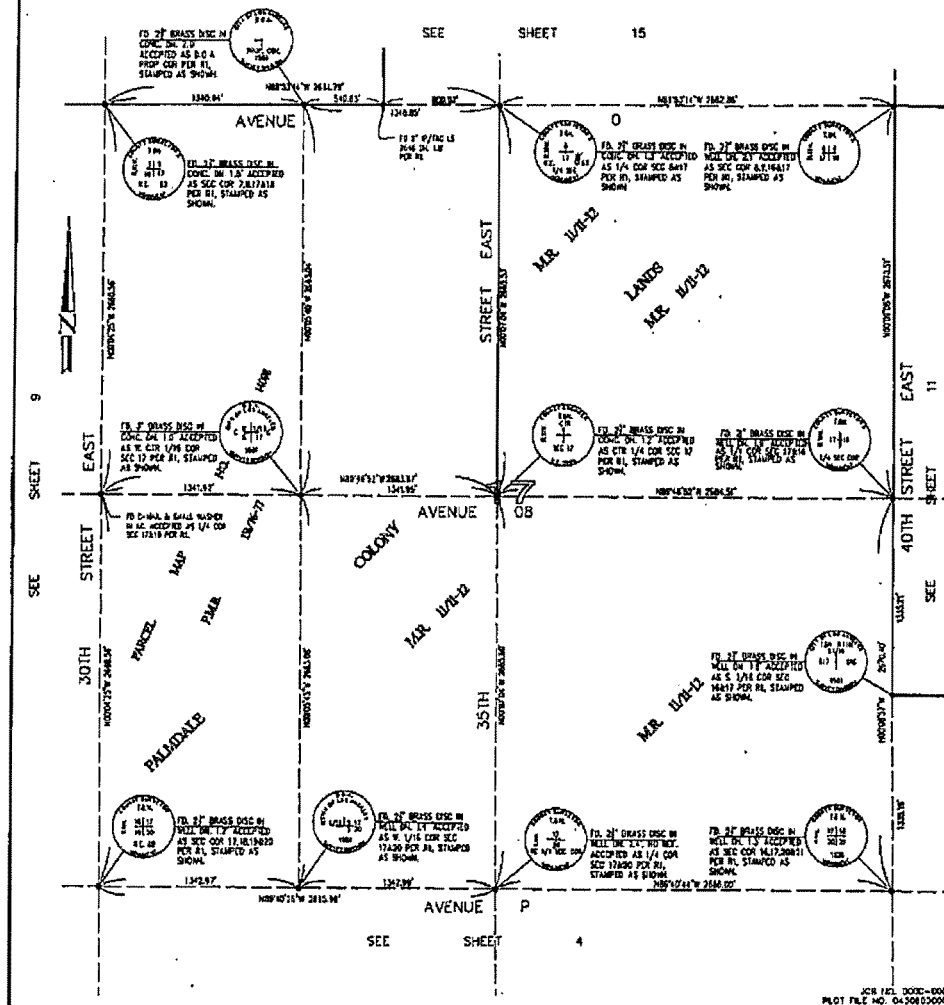


EXHIBIT B - TO CITY OF LOS ANGELES RESPONSE TO DISCOVERY ORDER

LAWA-VH DECL-0041

SHEET 11 OF 29

PARTLY IN THE CITY OF PALMDALE AND PARTLY IN
THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA

HALL & FOREMAN, INC. STEVE SHAMBECK, L.S. 6217
NOVEMBER 2005



LAWA-VH DECL-0042

SCALE
1"=400'

SHEET 12 OF 29

RECORD OF SURVEY

PARTLY IN THE CITY OF PALMDALE AND PARTLY IN
THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA

HALL & FOREMAN, INC. STEVE SHAMBECK, L.S. 6217
NOVEMBER 2005

SEE SHEET 20

18

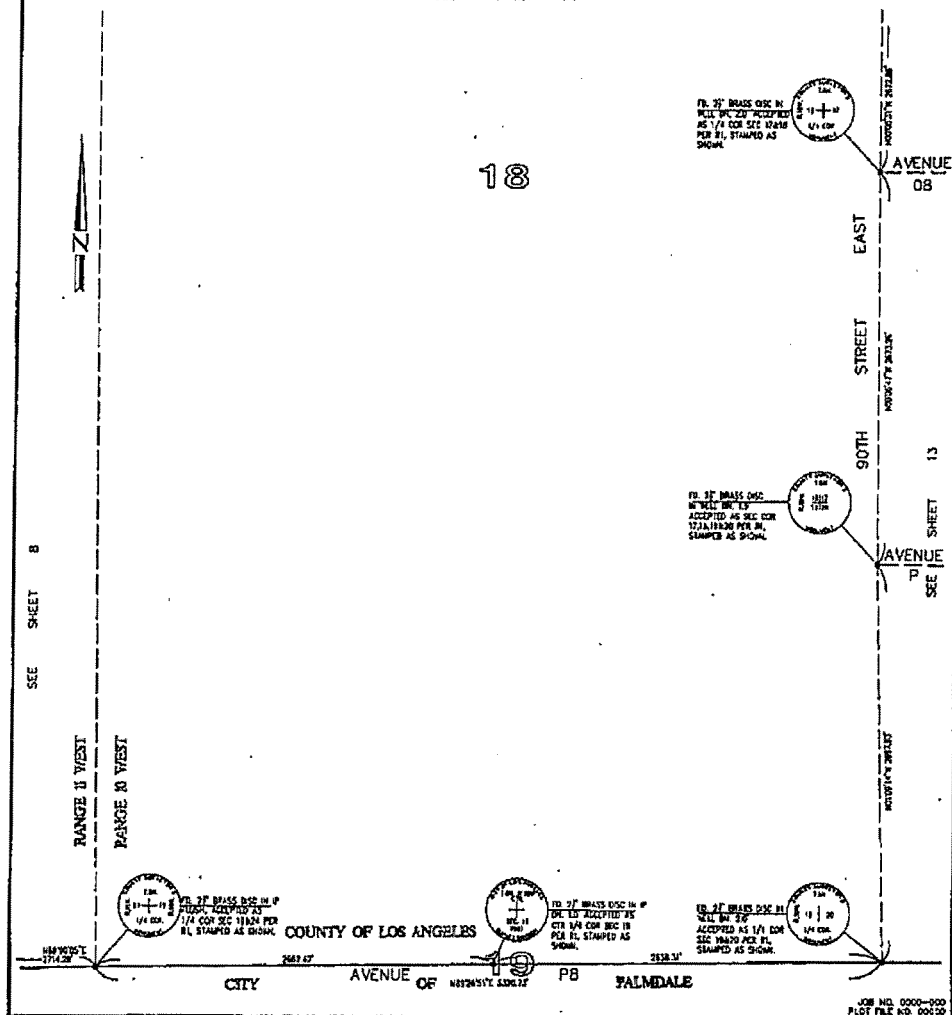


EXHIBIT B - TO CITY OF LOS ANGELES' RESPONSE TO DISCOVERY ORDER

LAWA-VH DECL-0043

PARTLY IN THE CITY OF PALMDALE AND PARTLY IN
THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA

HALL & FOREMAN, INC. STEVE SHAMBECK, L.S. 6217
NOVEMBER 2005



SCALE
1"=400'

SHEET 15 OF 29

RECORD OF SURVEY

PARTLY IN THE CITY OF PALMDALE AND PARTLY IN
THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA

HALL & FOREMAN, INC.

STEVE SHAMBECK, L.S. 6217

NOVEMBER 2005

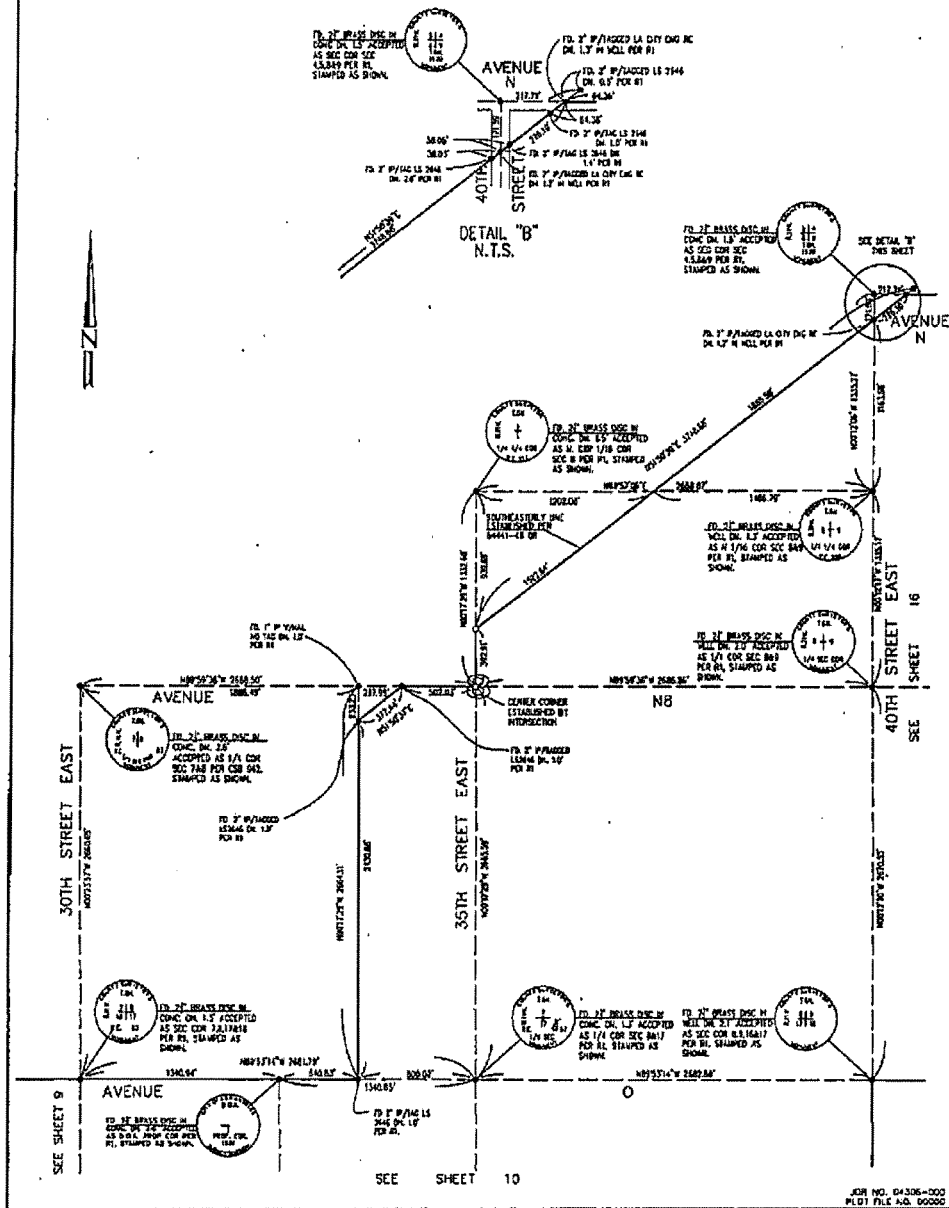


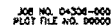
EXHIBIT B - TO CITY OF LOS ANGELES RESPONSE TO DISCOVERY ORDER

LAWA-VH DECL-0046

SHEET 16 OF 29

PARTLY IN THE CITY OF PALMDALE AND PARTLY IN
THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA

NOVEMBER 2005



LAWA-VH DECL-0047

RECORD OF SURVEY

PARTLY IN THE CITY OF PALMDALE AND PARTLY IN
THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA
HALL & FOREMAN, INC. STEVE SHAMBECK, L.S. 6217
NOVEMBER 2005

SEE SHEET 25
K8255D1W 5414.37
AVENUE

FD-37 BRASS CASE
SER. 23 ACCEPTED BY
SEC FOR 2.3.48 AM FOR
PL STAMPED AS SHOWN


 FOR 94 CLASS DISC
 IN BILL OF L
 ACCEPTED AS 1/4 COR
 SEC 2411 PER CS 5038.
 STAMPED AS SHOWN.

70. 37 BRASS BBS
IN NOLL ON 1-6
ACCEPTED AS SEC COP
12.11.12 FOR RI,
STAMPED AS SHOWN.

SEE	SHEET	17
-----	-------	----

61 133HS 33S SHEET

11

FD 27 BRASS DISC IN
HILL ONE 1.5" ACCEPTED
AS 1/4 COR SEC 11418
FOR CS 8736, STAMPED
AS SHOWN.

FD-36 BRASS DISC IN
WELL IN T.B. ACCEPTED
AS SEC COP 11,12,13,14
PER CS WASH STAMPS
AS SHOWN

IN
FIED
S&H
PCD

FD-37 BRASS DISC IN
WILL OR 1/2 ACCEPTED
AS 1/4 COR REC 12814
FOR CS 8730 STAMPED
AS 2-044

14

SEE SHEET 7

JOB NO. 04306-D30
PLOT FILE NO. D0000

SHEET 19 OF 29

PARTLY IN THE CITY OF PALMDALE AND PARTLY IN
THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA
HALL & FOREMAN, INC. STEVE SHAMBECK, L.S. 6217
NOVEMBER 2005

RSE TS/47

R.S.B. 68/45

R.S.B. 74/41

SEE SHEET 26

AVENUE

2

700754 2705.00

FD-36 (Rev. 5-22-64)
 BY MAIL ON 10
 ACCEPTED AS SEC COR
 12,11&12 PER NY
 STAMPED AS SHOWN.

70. 2" BRASS SEC
IN HOLE DIA 2.0"
ACCEPTED AS 1/4 COIL
SEC 1412 PER CS 8738
STAMPED AS SHOWN.

100 2" BRASS DISC
 IN WELL DUE 0.8"
 ACCEPTED AS SET CON
 1.27412 PER CS
 873560132 STAMPED

TRACT NO. 8897

12

MLR 106/22

FD-21" GRASS, 156 N
WELL DR. 1.5' ACCEPT
AS 1/4 COR SEC 11&1
PER GS 8738, STAMPE
15 8/20/41

72 2" BRASS DISC IN
WELL DR. 1.6" ACCEPTED
AS SEC COP 11.12.3.3M
PER CS 87.5M, 8.1M/PCS
1.5. DISC



1964 FORD MUSTANG
1/4 SEC COR

13

SEE SHEET 8

RANGE II TEST

RANGE 10 WEST

JCS NO. 54306-650
PLOT FILE NO. 00000

SHEET 20 OF 29

PARTLY IN THE CITY OF PALMDALE AND PARTLY IN
THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA
HALL & FOREMAN, INC. STEVE SHAMBECK, L.S. 6217
NOVEMBER 2005



LAWA-VH DECL-0051

SCALE
1"=400'

SHEET 21 OF 29

RECORD OF SURVEY

PARTLY IN THE CITY OF PALMDALE AND PARTLY IN
THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA

HALL & FOREMAN, INC.

STEVE SHAMBECK, L.S. 6217

NOVEMBER 2005

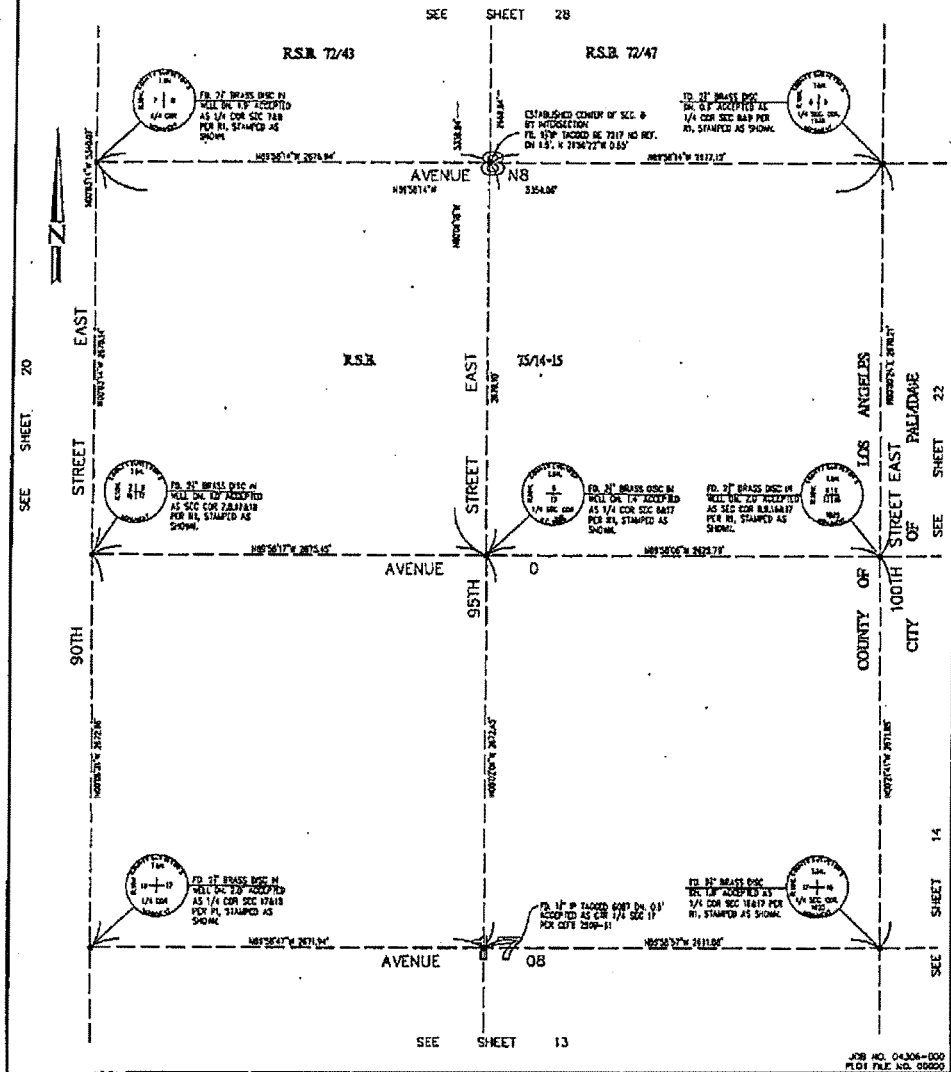


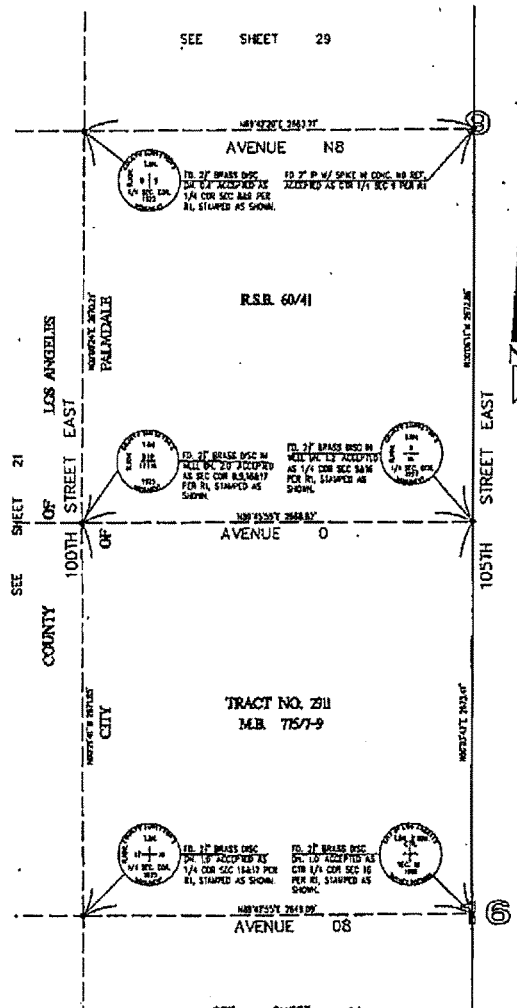
EXHIBIT B - TO CITY OF LOS ANGELES RESPONSE TO DISCOVERY ORDER

LAWA-VH DECL-0052

SHEET 22 OF 29

PARTLY IN THE CITY OF PALMDALE ANDPARTLY IN
THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA

SEE SHEET 29



SEE SHEET 14

JOE NO. D4306-000
PLOT FILE NO. 00000

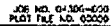
EXHIBIT B - TO CITY OF LOS ANGELES' RESPONSE TO DISCOVERY ORDER

LAWA-VH DECL-0053

SHEET 23 OF 29

PARTLY IN THE CITY OF PALMDALE AND PARTLY IN
THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA

NOVEMBER 2005



LAWA-VH DECL-0054

SHEET 24 OF 29

PARTLY IN THE CITY OF PALMDALE AND PARTLY IN
THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA

HALL & FOREMAN, INC. STEVE SHAMBECK, L.S. 6217
NOVEMBER 2005

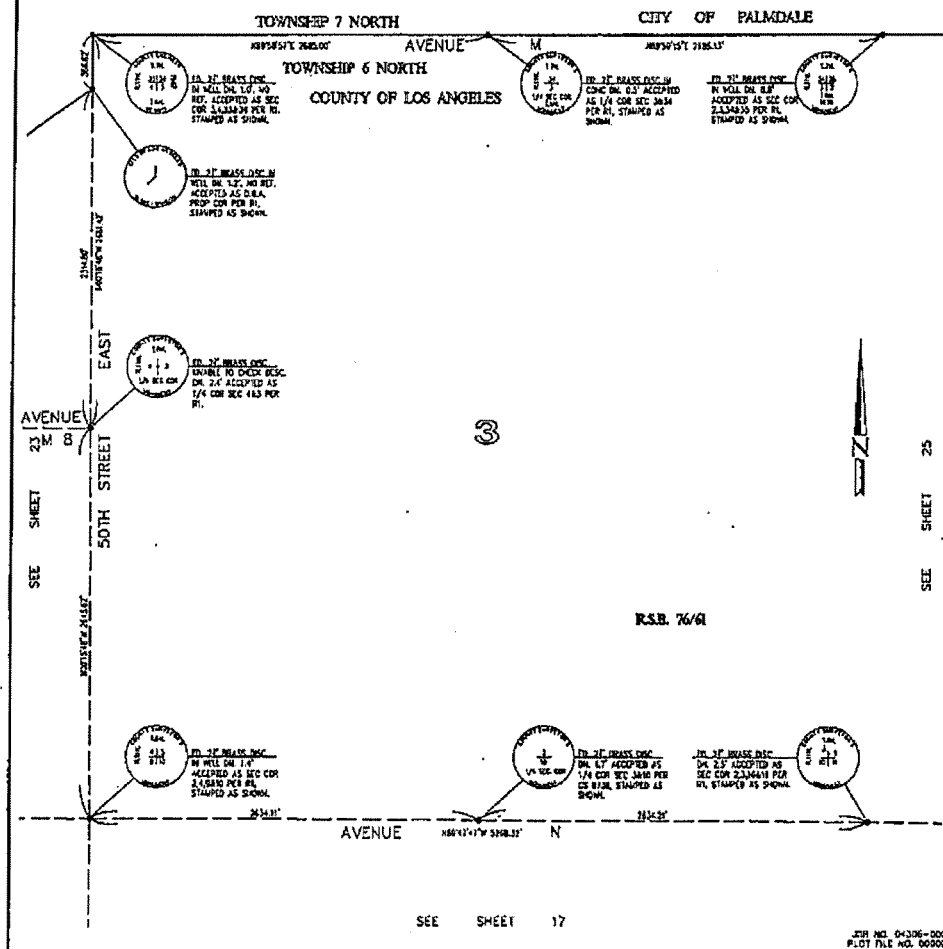


EXHIBIT B - TO CITY OF LOS ANGELES' RESPONSE TO DISCOVERY ORDER

LAWA-VH DECL-0055

SCALE
1"=400'

SHEET 25 OF 29

RECORD OF SURVEY

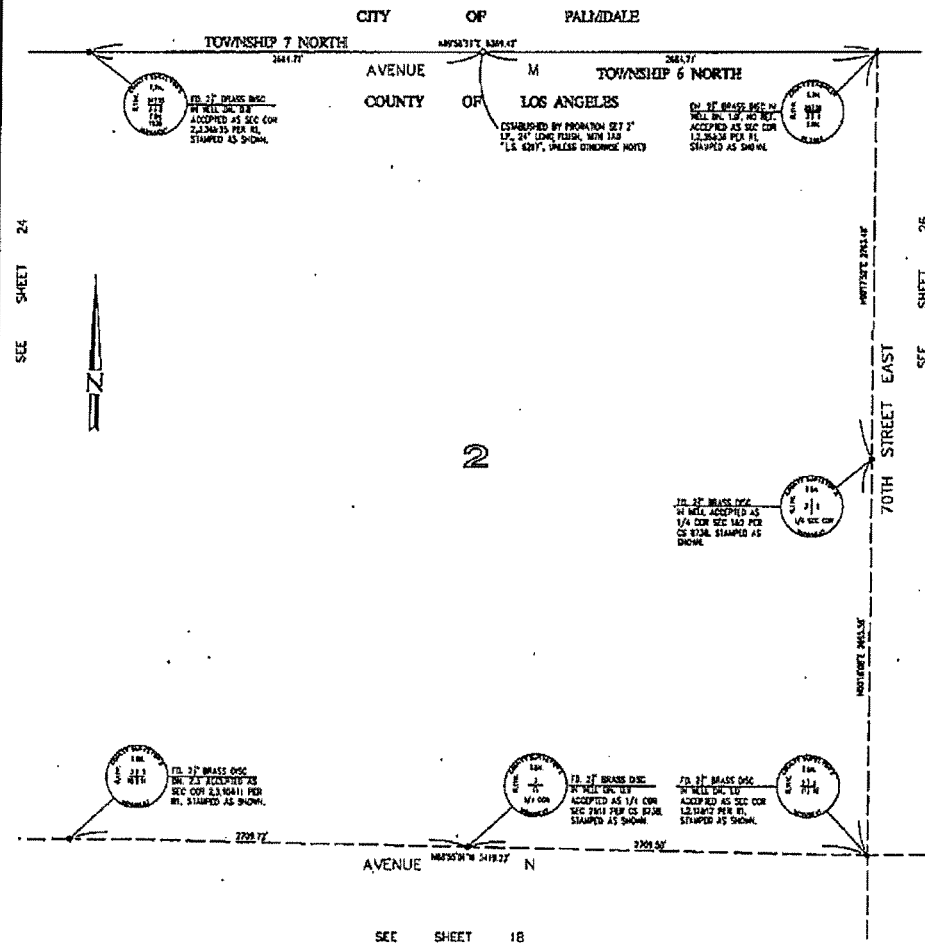
PARTLY IN THE CITY OF PALMDALE AND PARTLY IN
THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA

HALL & FOREMAN, INC.

NOVEMBER

STEVE SHAMBECK, L.S. 6217

2005



SHEET 26 OF 29

PARTLY IN THE CITY OF PALMDALE AND PARTLY IN
THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA

NOVEMBER 2005

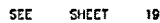


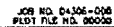
EXHIBIT B - TO CITY OF LOS ANGELES' RESPONSE TO DISCOVERY ORDER

LAWA-VH DECL-0057

SHEET 27 OF 29

PARTLY IN THE CITY OF PALMDALE AND PARTLY IN
THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA

NOVEMBER 2005



LAWA-VH DECL-0058

PARTLY IN THE CITY OF PALMDALE AND PARTLY IN
THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA

HALL & FOREMAN, INC. STEVE SHAMBECK, L.S. 6217
NOVEMBER 2005



SCALE
1"=400'

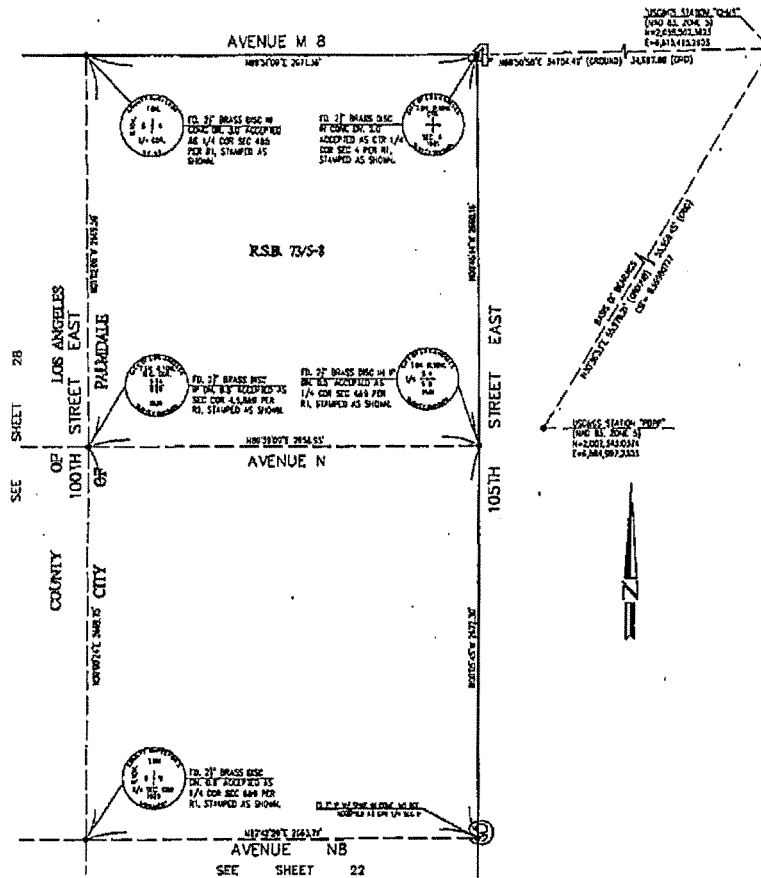
SHEET 29 OF 29

RECORD OF SURVEY

PARTLY IN THE CITY OF PALMDALE AND PARTLY IN
THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA

HALL & FOREMAN, INC. STEVE SHAMBECK, L.S. 5217
NOVEMBER 2005

RSR 72/28-N



JOB NO. 04306-000
PILOT FILE NO. 00000

EXHIBIT B - TO CITY OF LOS ANGELES' RESPONSE TO DISCOVERY ORDER

LAWA-VH DECL-0060



EXHIBIT B to

DECLARATION OF JANET K. GOLDSMITH

EXEMPT FROM FILING FEES
[Gov. Code, § 6103]

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

**Coordination Proceeding
Special Title (Rule 3.550(c))**

**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 325 201

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,
consolidated Actions, Case Nos. RIC 353
840, RIC 344 436, RIC 344 668

AND RELATED ACTIONS.

Judicial Council Coordination
Proceeding No. 4408

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

**JOINT STIPULATION OF FACTS FOR
TRIAL PURSUANT TO CASE
MANAGEMENT ORDER FOR PHASE
IV TRIAL**

[Assigned for All Purposes to the Honorable
Jack Komar]

Trial Date: May 28, 2013

OSC re: Approval of Stipulations:
March 15, 2013

Time: 9:00 a.m.
Dept: 1

Action Filed: October 26, 2005

Cross-Defendants, State of California, State of California 50th District Agricultural
Association (Collectively State of California), the City of Los Angeles, by and through its
Department of Airports, Los Angeles World Airports (LAWA), and the County Sanitation

1 AVEK

2 52. AVEK owns the properties in the Antelope Valley Adjudication Area identified in
3 Exhibits A and B of the Declaration of Dan Flory filed in this case, dated January 31, 2013 (Flory
4 Dec.), which total 2,917.29 acres.

5 53. The APNs for each of the AVEK owned properties are as set forth in Exhibit B to the
6 Flory Dec., and the dates when AVEK acquired title to those properties are as set forth in Exhibit
7 C to the Flory Dec.

8 54. AVEK also leases properties that it owns in the Antelope Valley Adjudication Area.
9 The properties it leases are as listed in Exhibit D to the Flory Dec.

10 55. The total acreage leased by AVEK in the Antelope Valley Adjudication Area is as
11 listed in Exhibit D to the Flory Dec.

12 56. The entities AVEK leases its land to are as listed in Exhibit D to the Flory Dec.

13 57. The dates that AVEK leased its land to those entities are as listed in Exhibit D to the
14 Flory Dec.

15 58. AVEK is the only entity that is seeking a water right for the water used on the land it
16 leases to those entities.

17 59. AVEK utilizes water on its owned properties for crop irrigation.

18 60. Excluding water banking, the water usage on AVEK owned properties averaged
19 14,671 acre-feet of water per year during calendar years 2000, 2001, 2002, 2003, 2004 and 2011
20 (with the highest water usage being 17,704 in 2011); the water usage in 2012, was 6,888 acre-feet
21 per year, when AVEK ceased farming operations on much of its properties, and focused instead
22 on using significant portions of the properties for water banking.

23 LAWA

24 61. LAWA owns approximately 17,750 acres of land that overlie the groundwater basin
25 in the Antelope Valley Adjudication Area. The specific properties consist of over twelve-
26 hundred contiguous parcels and are identified and recorded in the Assessor's tax rolls by
27 Assessor's Identification Numbers. The Assessor's Identification Numbers of each of the parcels
28

1 owned by LAWA are as identified in Exhibit A to the Declaration of Vivian D. Howell filed in
2 this case, dated January 31, 2013 (Howell Dec.).

3 62. Of these Assessor's Identification Numbers, lands identified by 15 of them have been
4 acquired since 1999. The Assessor's Identification Numbers for the properties thus acquired by
5 LAWA are as listed in Exhibit A-1 to the Howell Dec.

6 63. The location of the LAWA owned properties is as depicted in the parcel map and
7 Record of Survey, Exhibit B to the Howell Dec.

8 64. LAWA also leases properties that it owns that overlie the groundwater basin in the
9 Antelope Valley Adjudication Area to certain entities. None of the entities to which LAWA has
10 leased land since 2000 claims any groundwater rights for itself resulting from its use of water on
11 the LAWA land.

12 65. The properties it leases are as listed in Exhibit C to the Howell Dec.

13 66. LAWA's use of water on its property is set forth in the Declaration of Robert C.
14 Wagner filed in this case, dated January 31, 2013 (Wagner Decl.) In Mr. Wagner's expert
15 opinion, the highest water use on LAWA property for the years 2000-2004, 2011 and 2012
16 occurred in 2011. That year, 14,009.4 acre-feet of groundwater and recycled water was applied to
17 beneficial use. 28.36 acre-feet was used for domestic or municipal and industrial uses; the rest
18 was used for irrigated agriculture.

19 LA COUNTY SANITATION

20 67. LA County Sanitation owns properties that overlie the groundwater basin in the
21 Antelope Valley Adjudication Area. The properties owned by LA County Sanitation are as listed
22 by APN in Exhibit A to the Declaration of Raymond Tremblay filed in this case, dated January
23 31, 2013 (Tremblay Dec.).

24 68. LA County Sanitation owns more than 8,000 acres within the Antelope Valley
25 Adjudication Area and the individual parcel size, corresponding to the APN, are as listed in
26 Exhibit A to the Tremblay Dec.

27 69. LA County Sanitation utilizes water on its owned properties for crop irrigation and
28 for in-plant use at its sanitation plants.