

1 JANET K. GOLDSMITH, State Bar No. 065959

*jgoldsmith@kmtg.com*

2 KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD

A Professional Corporation

3 400 Capitol Mall, 27<sup>th</sup> Floor

Sacramento, California 95814

4 Telephone: (916) 321-4500

Facsimile: (916) 321-4555

5 MICHAEL N. FEUER, State Bar No. 111529

6 Los Angeles City Attorney

RICHARD M. BROWN, General Counsel, Water and Power

7 RAYMOND ILGUNAS, General Counsel, Los Angeles World Airports

Attorneys for Defendant CITY OF LOS ANGELES and

8 LOS ANGELES WORLD AIRPORTS

9 Attorneys for Cross-Defendants City of Los

Angeles and Los Angeles World Airports

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

11 **COUNTY OF LOS ANGELES**

12  
13 Coordination Proceeding

14 ANTELOPE VALLEY GROUNDWATER  
15 CASES,

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

17 Los Angeles County Waterworks District No.  
18 40 v. Diamond Farming Co.

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

20 Diamond Farming Co. v. City of Lancaster

21 Diamond Farming Co. v. Palmdale Water  
22 District,

23 AND RELATED ACTIONS  
24  
25  
26

Case No. 105 CV 049053

Judicial Council Coordination  
Proceeding No. 4408

**CROSS-DEFENDANT CITY OF LOS  
ANGELES' JOINDER IN JOINT CASE  
MANAGEMENT CONFERENCE  
STATEMENT**

Judge: Hon. JACK KOMAR  
Date: January 7, 2015  
Time: 10:00 a.m. (teleconference only)

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

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

27 TO ALL PARTIES AND TO ALL PARTIES' ATTORNEYS OF RECORD:

28 Cross-defendant City of Los Angeles, by and through its Department of Airports, Los

1 Angeles World Airports ("LAWA") hereby provides the following Case Management Statement.

2 LAWA has participated in numerous negotiations sessions, discussions, drafting sessions  
3 and other written communications with a large group of parties over at least the past year in order  
4 to formulate the terms and form of a proposed Judgment and Physical Solution and Stipulation for  
5 Entry of Interlocutory Judgment and Physical Solution mutually agreeable to the parties in this  
6 Adjudication. In addition to oral reports of settlement negotiation progress given to the Court at  
7 virtually every Case Management Conference during 2014, negotiation sessions were preceded by  
8 a letter to all parties, posted on the Court's website, providing notice of the settlement meetings  
9 and giving the date, time and location.

10 The settlement negotiations have now concluded and a proposed Judgment and a  
11 Stipulation for Entry of Judgment and Physical Solution are now under consideration for approval  
12 by the parties. Reopening settlement discussions to allow participation of late-comers would,  
13 under the circumstances, pose a serious threat of unraveling the settlement itself.

14 LAWA joins in the joint case management conference statement filed by Los Angeles  
15 County Waterworks District 40, United States Department of Justice, Gertrude J. Van Dam,  
16 Delmar D. Van Dam, Craig Van Dam, Gary Van Dam, WDS California II, LLC; Palmdale Water  
17 District; Tejon Ranchorp and Granite Construction Company; Quartz Hill Water District; City of  
18 Lancaster and Rosamond Community Services District; Antelope Valley United Mutuals Group,  
19 Adams Bennett Investments, LLC; Miracle Improvement Corporation dba Golden Sands Trailer  
20 Park, Sheep Creek Water Company, Inc., Service Rock Products, LP, and Saint Andrew's Abbey,  
21 Inc., on December 31, 2014.

22 Dated: December 31, 2014.

KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD  
A Professional Corporation

23  
24  
25 By:



Janet K. Goldsmith

Attorneys for Cross-Defendants

City of Los Angeles and Los Angeles World  
Airports

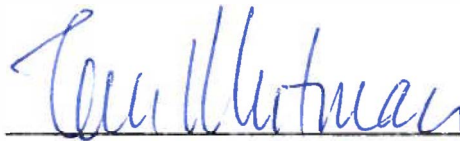
**PROOF OF SERVICE**

I, Terri Whitman, declare:

I am a citizen of the United States and employed in Sacramento County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 400 Capitol Mall, 27th Floor, Sacramento, California 95814. On December 31, 2014, I served a copy of the within document: CROSS-DEFENDANT CITY OF LOS ANGELES' JOINDER IN JOINT CASE MANAGEMENT CONFERENCE STATEMENT via electronic posting to the Santa Clara Superior Court E-Filing website,  
<http://www.scefiling.org/cases/casehome.jsp?caseId=19>

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

Executed on December 31, 2014 at Sacramento, California.

  
Terri Whitman

**EXHIBIT "A"**

Robert H. Joyce  
Law Offices of Lebeau Thelen, LLP  
5001 East Commerce Center Drive,  
Suite 300  
P.O. Box 12092  
Bakersfield, CA 93389-2092  
[bjoyce@lebeauthelen.com](mailto:bjoyce@lebeauthelen.com),  
[DLuis@lebeauthelan.com](mailto:DLuis@lebeauthelan.com)

Attorneys for Diamond Farming Company

Douglas J. Evertz  
Stradling, Yocca, Carlson & Rauth  
660 Newport Center Drive, Suite 1600  
Newport Beach, CA 92660-6522  
[devertz@sycr.com](mailto:devertz@sycr.com)

Attorneys for City of Lancaster

James L. Markman  
Richards Watson & Gershon  
P.O. Box 1059  
Brea, CA 92822-1059  
[jmarkman@rwglaw.com](mailto:jmarkman@rwglaw.com)

Attorneys for City of Palmdale

Steve R. Orr  
Bruce G. McCarthy  
Richards Watson & Gershon  
355 South Grand Avenue, 40th Floor  
Los Angeles, CA 90071-3101  
[sorr@rwglaw.com](mailto:sorr@rwglaw.com)

Attorneys for City of Palmdale

Michael Fife  
Hatch and Parent  
21 East Carrillo Street  
Santa Barbara, CA 93101-2782  
[mfife@hatchparent.com](mailto:mfife@hatchparent.com)

Attorneys for Eugene B. Nebeker on behalf of Nebeker Ranch, Inc., Bob Jones on behalf of R&M Ranch, Inc., Forrest G. Godde and Steve Godde, Gailen Kyle on behalf of Kyle & Kyle Ranch, Inc. and John Calandri on behalf of Canandri/Sonrise Farms, collectively known as the Antelope Valley Groundwater Agreement Association ("AGWA")

Richard Zimmer  
Clifford & Brown  
1430 Truxtun Avenue, Suite 900  
Bakersfield, CA 93301  
[rzimmer@clifford-brownlaw.com](mailto:rzimmer@clifford-brownlaw.com)

Attorneys for Bolthouse Properties, Inc.

Julie A. Conboy  
Department of Water and Power  
111 North Hope Street  
P.O. Box 111  
Los Angeles, CA 90012  
[Julie.Conboy@ladwp.com](mailto:Julie.Conboy@ladwp.com)

Attorneys for Department of Water and Power

Wayne K. Lemieux  
Lemieux & O'Neill  
2393 Townsgate Road, Suite 201  
Westlake Village, CA 91361  
[Wayne@Lemieux-oneill.com](mailto:Wayne@Lemieux-oneill.com)

Attorneys for Littlerock Creek Irrigation  
District and Palm Ranch Irrigation District

Thomas Bunn  
Lagerlof, Senecal, Bradley, Gosney & Kruse  
301 North Lake Avenue, 10th Floor  
Pasadena, CA 91101-4108  
[TomBunn@lagerlof.com](mailto:TomBunn@lagerlof.com)

Attorneys for Palmdale Water District and  
Quartz Hill Water District

Henry Weinstock  
Nossaman, Guthner, Knox, Elliott LLP  
445 South Figueroa Street, 31st Floor  
Los Angeles, CA 90071  
[hweinstock@nossaman.com](mailto:hweinstock@nossaman.com)  
[ffudacz@nossaman.com](mailto:ffudacz@nossaman.com)

Attorneys for Tejon Ranch

John Tootle  
California Water Service Company  
3625 Del Amo Boulevard, Suite 350  
Torrance, CA 90503  
[jtootle@calwater.com](mailto:jtootle@calwater.com)

Attorneys for City of Palmdale  
Attorneys for California Water Service  
Company

Eric Garner  
Best, Best & Krieger, LLP  
P.O. Box 1028  
Riverside, CA 92502-1028  
[ELGarner@bbklaw.com](mailto:ELGarner@bbklaw.com)  
[Lynda.Serwy@bbklaw.com](mailto:Lynda.Serwy@bbklaw.com)  
[JVDunn@bbklaw.com](mailto:JVDunn@bbklaw.com)  
[kkeefe@bbklaw.com](mailto:kkeefe@bbklaw.com)

Attorneys for Los Angeles County  
Waterworks District No. 40 and Rosamond  
Community Services District and on behalf  
of City of Palmdale, City of Lancaster,  
Palmdale Water District and Quartz Hill  
Water District

Raymond G. Fortner, Jr.  
County Counsel  
Frederick W. Pfaeffle, Sr. Deputy Counsel  
Office of County Counsel  
County of Los Angeles  
500 West Temple Street  
Los Angeles, CA 90012  
[fpfaeffle@counsel.co.la.ca.us](mailto:fpfaeffle@counsel.co.la.ca.us)

Chair, Judicial Council of California  
Administrative Office of the Courts  
Attn: Appellate & Trial Court Judicial  
Services  
(Civil Case Coordination)  
455 Golden Gate Avenue  
San Francisco, CA 94102

1 Honorable Jack Komar  
2 Judge of the Superior Court of California,  
3 County of Santa Clara  
4 191 North First Street, Dept. 17C  
5 San Jose, CA 95113

6 Daniel V. Hyde  
7 Lewis, Brisbois, Bisgaard & Smith, LLP  
8 221 N. Figueroa Street, Suite 1200  
9 Los Angeles, CA 90012  
10 [hyde@lbbslaw.com](mailto:hyde@lbbslaw.com)

11 Lee Leininger  
12 Environment and Natural Resources Division  
13 Department of Justice  
14 999 – 18<sup>th</sup> Street, Suite 945  
15 Denver, CO 80202  
16 [Lee.leininger@usdoj.gov](mailto:Lee.leininger@usdoj.gov)  
17 [Judy.Tetreault@usdoj.gov](mailto:Judy.Tetreault@usdoj.gov)

Attorneys for Edwards Air Force Base,  
United States Department of the Air Force

18 Debra W. Yang  
19 United States Attorney's Office  
20 Central District of California  
21 300 North Los Angeles Street  
22 Los Angeles, CA 90012

23 Alberto Gonzales  
24 United States Attorney General  
25 Department of Justice  
26 950 Pennsylvania Avenue, NW  
27 Washington, DC 20530-0001

28 John Slezak, Esq.  
Iverson, Yoakum, Papiano & Hatch  
One Wilshire Boulevard., 27<sup>th</sup> Floor  
624 S. Grand Avenue  
Los Angeles, CA 90017  
[Jslezak@iyph.com](mailto:Jslezak@iyph.com)

Attorneys for City of Los Angeles  
Department of Water and Power

Janet K. Goldsmith  
Kronick, Moskovitz, Tiedemann & Girard  
400 Capitol Mall, 27<sup>th</sup> Floor  
Sacramento, CA 95814-4417  
[jgoldsmith@kmtg.com](mailto:jgoldsmith@kmtg.com)

Attorneys for City of Los Angeles  
Department of Water and Power