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8 Estates

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10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF LOS ANGELES – CENTRAL DISTRICT
12

13 ANTELOPE VALLEY GROUNDWATER
CASES

14 Included Actions:
15 Los Angeles County Waterworks District No.
40 v. Diamond Farming Co., Superior Court
16 of California, County of Los Angeles, Case
No. BC 325201;

17 Los Angeles County Waterworks District No.
18 40 v. Diamond Farming Co., Superior Court
of California, County of Kern, Case No. S-
19 1500-CV-254-348;

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

23 RICHARD WOOD, on behalf of himself and
24 all other similarly situated v. A.V. Materials,
Inc., et al., Superior Court of California,
25 County of Los Angeles, Case No. BC 509546

LASC Case No.: BC 325201

Judicial Council Coordination Proceeding
No. 4408

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

Assigned to the Honorable Jack Komar, Judge of
the Santa Clara Superior Court

**DECLARATION OF LUCAS I. QUASS IN
SUPPORT OF RESPONSE TO
WATERMASTER'S MOTION FOR ORDER
INTERPRETING THE JUDGMENT
REGARDING PRERAMPDOWN
PRODUCTION**

Hearing: January 31, 2018

Time: 9:00 a.m.

Dept.: Stanley Mosk Court House, Room 222

*[Filed concurrently with Response to
Watermaster's Motion for Order Interpreting the
Judgment Regarding Prerampdown Production.]*

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DECLARATION OF LUCAS I. QUASS

I, Lucas I. Quass, declare as follows:

1. I have personal knowledge of the facts below, and if called upon to do so, I could testify competently thereto in a court of law.

2. I am licensed to practice law in the State of California and I am an attorney of Latham & Watkins LLP, attorneys of record for Clan Keith Real Estate Investments, LLC dba Leisure Lake Mobile Estates ("Clan Keith").

3. Attached hereto as Exhibit "A" is a true and correct copy of the Court's Judgment in the above-captioned matter, approved by the Court on December 23, 2015 (the "Judgement").

4. Attached hereto as Exhibit "B" are true and correct copies of excerpts from the Court's Judgment and Physical Solution, which is Exhibit A to the Judgment.

5. Attached hereto as Exhibit "C" are true and correct copies of excerpts from the Court's Statement of Decision, adopted by the Court on December 23, 2015.

6. Attached hereto as Exhibit "D" is a true and correct copy of Clan Keith's September 22, 2015, Trial Stipulation.

7. Attached hereto as Exhibit "E" is a true and correct copy of Clan Keith's Prove-Up Trial Brief filed with this Court on September 25, 2015.

8. Attached hereto as Exhibit "F" are true and correct copies of the Declaration of Jerry Delucia In Lieu of Testimony for Phase VI Trial and its supporting exhibits A through E, which were admitted as evidence by this Court on September 29, 2015 at the Phase VI Trial. The Delucia Declaration established the reasonable and beneficial use of groundwater at Leisure Lake from 2003 through 2015.

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

Executed this 18th day of January, 2018, at Los Angeles, California.



Lucas I. Quass

PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to this action. My business address is Latham & Watkins LLP, 355 South Grand Avenue, Los Angeles, CA 90071-1560.

On **January 18, 2018**, I served the following document described as:

**DECLARATION OF LUCAS I. QUASS IN SUPPORT OF
RESPONSE TO WATERMASTER'S MOTION FOR ORDER
INTERPRETING THE JUDGMENT REGARDING
PRERAMPDOWN PRODUCTION**

By posting the document(s) listed above to the Santa Clara County Superior Court website in regard to the Antelope Valley Groundwater matter.

The party on whom this electronic mail has been served has agreed in writing to such form of service pursuant to agreement.

I declare that I am employed in the office of a member of the Bar of, or permitted to practice before, this Court at whose direction the service was made and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on **January 18, 2018**, at Los Angeles, California.


Cleveland Styles