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5 Attorneys for Defendants
6 **HOOSHPACK DEVELOPMENT, INC. and**
7 **RENAISSANCE PERINATAL MEDICAL GROUP**
8 **PROFESSIONAL CORPORATION (ROE 2335)**

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 COUNTY OF LOS ANGELES

11 ANTELOPE VALLEY GROUNDWATER
12 CASES

13 Included Actions:

14 Los Angeles County Waterworks District No.
15 40 v. Diamond Farming Co., Los Angeles
16 County Superior Court Case No. BC325201

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

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

Judicial Council Consolidation No. 4408

For filing purposes only:
Santa Clara County Case No. 1-05-CV-
0499053

Assigned to the Hon. Jack Komar

DECLARATION OF ARDESHIR KARIMI

Date: December 23, 2015
Time: 10:00am
Place: Room 222, 111 N. Hill Street,
Los Angeles, California 90012

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I, Ardeshir Karimi, declare:

1. I am over the age of 18 and competent to make this declaration. I submit this declaration in support of the *Case Management Conference Statement of Hooshpack Development, Inc. and Renaissance Perinatal Medical Group Professional Corporation*. I have personal knowledge of the facts set forth in this declaration and could and would testify competently thereto if called as a witness.

2. I am the President of Hooshpack Development, Inc. ("Hooshpack"). I have been the President of Hooshpack since January 2008, except for a 10-month period in 2010 when attorney David Ray served as President by court appointment. Prior to 2008, I was the Secretary of Hooshpack since its inception. The prior President of Hooshpack was my father, Hooshang Karimi, who was President until his passing in December 2007.

3. I am also the President of Renaissance Perinatal Medical Group Professional Corporation (“Renaissance Perinatal”).

4. I first learned of this lawsuit in late August 2015, when a copy of the summons and complaint were delivered to me on behalf of Renaissance Perinatal. I understand that Renaissance Perinatal was first named as a party on or about July 31, 2015. (*See* Document 10271.)

5. I subsequently discovered that Hooshpack was also named as a party in this action. Thus, on or about September 28, 2015, prior counsel for Hooshpack and Renaissance Perinatal filed an answer on behalf of both Hooshpack and Renaissance Perinatal. That answer remains in the Court's file today. (*See* Document 10677.)

6. After the answer was filed on behalf of both Hooshpack and Renaissance Perinatal, I learned for the first time that a default judgment had been entered against Hooshpack on or about March 23, 2012. (*See* Document 6498.) I further learned that the default judgment was based on a proof of service that purports to show service on Hooshpack at 1254 Holmby Avenue, Los Angeles, California 90024. According to the proof of service, the summons and complaint and related documents were served on July 2, 2007, at 7:15pm, by delivering copies to

1 “Hooshana Karimi, person authorized to accept, Armenian male 40 yrs 5’7” 178 lbs brwn hr grn
2 eyes.” (See Document 3602.)

3 7. In July 2007, I was part owner of the residence located at 1254 Holmby Avenue
4 in Los Angeles. The other owners were my 79-year-old father, Hooshang Karimi, and my wife,
5 Anita Mathoni. My father permanently resided at that address in 2007. In July 2007, no one by
6 the name of Hooshana Karimi resided at that address. In July 2007, no one answering the
7 physical description provided on the proof of service resided at that address. My father was then
8 nearly twice the stated age of the person purportedly served, and was nearly totally bald. What
9 little hair he had was white, not brown.

10 8. In July 2007, my father Hooshang Karimi was the President of Hooshpack. As
11 described above, I became the President of Hooshpack in January 2008, following the passing of
12 my father in December 2007. I have found no evidence in the books and records of Hooshpack
13 that a summons and complaint were served on Hooshpack in this matter, and my father never
14 told me before his passing that Hooshpack had been served with a summons and complaint.

15 9. Since learning of this lawsuit, I have begun investigating the groundwater
16 pumping history of both Hooshpack and Renaissance Perinatal. The answer filed by Hooshpack
17 and Renaissance Perinatal identifies sixteen (16) parcels of land owned by Hooshpack and three
18 parcels (3) owned by Renaissance Perinatal. Of the sixteen (16) parcels owned by Hooshpack,
19 six (6) comprise a single farming operation (Farm #848, Tract #20141, consisting of parcel
20 numbers 3238-006-004, 3238-006-005, 3238-006-006, 3238-006-011, 3238-006-012, and 3238-
21 006-013). Farming operations have taken place on the property for over 40 years. I am
22 specifically aware that both barley and alfalfa have been cultivated on the property. There is an
23 operational water well located on the property from which groundwater has been pumped. My
24 preliminary estimate is that the well has pumped approximately 3-4 acre-feet per year. I am
25 attempting to more specifically determine the amount of groundwater that has been pumped from
26 this well. As to the other properties owned by Hooshpack and Renaissance Perinatal, I continue
27 to investigate possible historic groundwater pumping.

10. I respectfully request that both Hoospack and Renaissance Perinatal be given an opportunity to demonstrate to the Court the amount of water they have historically pumped on their several properties and that no judgment be entered against them until they have had such an opportunity.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on December 22, 2015, in San Gabriel, California.

Ardestur Kerimi

Ardeshir Karimi

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On December 22, 2015, I served true copies of the following document(s) described as:

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


K. Eric Adair