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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

10 Coordination Proceeding
11 Special Title (Rule 1550(b))

12 **ANTELOPE VALLEY GROUNDWATER**
13 **CASES**

14 Including Consolidated Actions:

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

17 Los Angeles County Waterworks District
No. 40 v. Diamond Farming Co.; Superior
18 Court of California, County of Kern, Case
No. S-1500-CV-254348;

19 Wm. Bolthouse Farms, Inc. v. City of
20 Lancaster; Diamond Farming Co. v. City of
Lancaster; Diamond Farming Co. v.
21 Palmdale Water Dist.; Superior Court of
California, County of Riverside, consolidated
22 actions, Case Nos. RIC 353840, RIC 344436,
RIC 344668;

23 AND RELATED ACTIONS.
24
25
26
27
28

Judicial Council Coordination Proceeding
No. 4408

LASC Case No. BC325201

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

*Assigned for All Purposes to the Honorable
Jack Komar Department 17C*

**DECLARATION OF NELSON CHUNG IN
SUPPORT OF MAGNOLIA LP'S
MOTION TO INTERVENE IN
JUDGMENT**

*[Filed concurrently with Notice of Motion and
Motion; Memorandum of Points and
Authorities; and [Proposed] Order Granting
Motion to Intervene]*

RESERVATION ID: 761313524759

Date: November 20, 2025

Time: 8:30 a.m.

Dept.: 17C

1 I, Nelson Chung, declare as follows:

2 1. I am the Manager of Pac Home, LLC, the sole general partner of Magnolia, LP, a
3 California limited partnership, the Movant herein. I am also the president of Pacific Communities
4 Builder, Inc., which is an affiliate of Magnolia, LP. I have personal knowledge of the matters set forth
5 herein, and if called as a witness, I could competently testify thereto. I hereby state that the documents
6 attached hereto constitute writings compiled and prepared in the regular and ordinary course of
7 business.

8 2. Magnolia, LP (“Magnolia”) is the owner of a well located at Lot 131 of TTM 60148
9 (APN 3023-006-067), located in the Central Antelope Subarea of the Antelope Valley Groundwater.

10 3. Pacific Communities Builder, Inc. (“PCB”) is the developer of the planned Pacific
11 Mesquite development constructed nearby on the parcels 3023-006-006, 3023-006-028, 3023-006-
12 029, 3023-006-040, 3023-006-049, 3023-006-049, and 3023-006-057.

13 4. Magnolia prepared a New Production Application on July 11, 2025 for the purpose of
14 reactivating the property’s existing well to temporarily provide construction water for rough grading
15 operations and dust control. Magnolia/PCB is requesting temporary new production of approximately
16 93 acre-feet (“AF”) to be used over the course of two years for construction water use in support of
17 the Pacific Mesquite development.

18 5. A true and correct copy of Magnolia’s New Production Application is attached hereto
19 and incorporated by reference as Exhibit A.

20 6. A true and correct copy of the check paid to the Antelope Valley Watermaster for
21 Magnolia’s New Production Application Fee is attached hereto and incorporated by reference as
22 Exhibit B.

23 7. I am informed and believed that the Watermaster posted on its website and otherwise
24 made available Magnolia’s New Production Application as part of the Antelope Valley Watermaster
25 Agenda Packet for the September 24, 2025 Watermaster Board meeting. A true and correct excerpt of
26 the relevant section of the September 24, 2025 Agenda Packet is attached hereto and incorporated by
27 reference as Exhibit C.

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8. I am informed and believe that Magnolia's New Production Application was evaluated by the Antelope Valley Watermaster Engineer on September 10, 2025. A true and correct copy of the Watermaster Engineer's letter is included on page 5 of the Agenda Packet attached hereto and incorporated by reference as Exhibit C.

9. I am informed and believe that during the Antelope Valley Watermaster Board meeting on September 24, 2025, Magnolia's New Production application was considered by the Board, and the public was offered the opportunity to provide comment.

10. The Antelope Valley Watermaster Board of Directors unanimously passed Resolution No. R-25-47. A true and correct copy of Resolution No. R-25-47 as provided to Magnolia by the Watermaster is attached hereto and incorporated by reference as Exhibit D.

11. Magnolia desires to intervene into this Action and become a Party to the Judgment herein, and I respectfully request that this Court enter an Order to that effect.

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

Executed on October 10, 2025, at Newport Beach, California.

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NELSON CHUNG