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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.
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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
AMENDED MOTION TO INTERVENE IN
JUDGMENT**

*[Filed concurrently with Amended Notice of
Motion and Motion; Memorandum of Points
and Authorities; and [Proposed] Amended
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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PROOF OF SERVICE

I, Dana Camacho, declare:

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is Alston & Bird LLP, 350 S. Grand Avenue, 51st Floor, Los Angeles, CA 90071.

On October 24, 2025, I served the document(s) described as **DECLARATION OF NELSON CHUNG ISO MAGNOLIA, LP'S AMENDED MOTION TO INTERVENE IN THE JUDGMENT** on the interested parties in this action by enclosing the document(s) in a sealed envelope addressed as follows:

See Attached Service List

- BY MAIL: I am "readily familiar" with this firm's practice for the collection and the processing of correspondence for mailing with the United States Postal Service. In the ordinary course of business, the correspondence would be deposited with the United States Postal Service at 350 S. Grand Avenue, 51st Floor, Los Angeles, CA 90071, with postage thereon fully prepaid the same day on which the correspondence was placed for collection and mailing at the firm. Following ordinary business practices, I placed for collection and mailing with the United States Postal Service such envelope at Alston & Bird LLP, 350 S. Grand Avenue, 51st Floor, Los Angeles, CA 90071.
- UPS NEXT DAY AIR OVERNIGHT DELIVERY: I deposited such envelope in a facility regularly maintained by UPS Overnight Delivery [specify name of service:] with delivery fees fully provided for or delivered the envelope to a courier or driver of UPS OVERNIGHT DELIVERY [specify name of service:] authorized to receive documents at Alston & Bird LLP, 350 S. Grand Avenue, 51st Floor, Los Angeles, CA 90071.
- BY ELECTRONIC SERVICE: by posting the document(s) listed above to the Antelope Valley Groundwater Cases to all parties listed on the Santa Clara Superior Court Service List as maintained via Glotrans. Electronic service completed through <http://www.avwatermaster.org>.
- [State] I declare under penalty of perjury under the laws of the State of CA that the above is true and correct.
- [Federal] I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 24, 2025, at Los Angeles, California.

/s/ Dana Camacho

Dana Camacho