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11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

12 **COUNTY OF LOS ANGELES**

13 Coordination Proceeding  
14 Special Title (Rule 1550(b))

) Judicial Council Coordination  
) Proceeding No. 4408  
)

15 ANTELOPE VALLEY GROUNDWATER CASES

) **UNITED STATES' ANSWER TO**  
) **CROSS-COMPLAINT OF**  
) **MUNICIPAL PURVEYORS FOR**  
) **DECLARATORY AND**  
) **INJUNCTIVE RELIEF AND**  
) **ADJUDICATION OF WATER**  
) **RIGHTS**

16 Included actions:

17 Los Angeles County Waterworks District No. 40 v.  
18 Diamond Farming Co., et al.  
19 Superior Court of California, County of Los Angeles,  
20 Case No. BC 325 201  
21 Los Angeles County Waterworks District No. 40 v.  
22 Diamond Farming Co., et al.  
23 Superior Court of California, County of Kern, Case  
24 No. S-1500-CV-254-348  
25 Wm. Bolthouse Farms, Inc. v. City of Lancaster  
26 Diamond Farming Co. v. City of Lancaster  
27 Diamond Farming Co. v. Palmdale Water Dist.  
28 Superior Court of California, County of Riverside,  
consolidated actions, Case nos. RIC 353 840, RIC  
344 436, RIC 344 668

**ROSAMOND COMMUNITY SERVICES, et al.**

**Cross-Complainants,**

**v.**

**DIAMOND FARMING CO., et al.**

**Cross-Defendants.**

1 Defendant United States of America ("United States") answers the Cross-Complaint of  
2 Rosamond Community Services District, Los Angeles County Waterworks District No. 40,  
3 Palmdale Water District, City of Palmdale, City of Lancaster, Quartz Hill Water District, Little  
4 Rock Creek Irrigation District, and California Water Service Company (collectively, the "Cross-  
5 Complainants") as follows:  
6

7 **ADMISSIONS AND DENIALS**

8 In accordance with California Code of Civil Procedure § 431.30, the United States admits  
9 and denies every material allegation of the Cross-Complaint, with each numbered paragraph,  
10 below, corresponding to the same number in the Cross-Complaint, as follows:  
11

12 1. This paragraph contains allegations which constitute a characterization of Cross-  
13 Complainants' case to which no response is required. To the extent that a response is required,  
14 the United States lacks sufficient knowledge to admit or deny the allegations of this paragraph,  
15 and denies them on that basis.

16 2. The United States lacks sufficient knowledge to admit or deny the allegations of this  
17 paragraph, and denies them on that basis.  
18

19 3. The United States lacks sufficient knowledge to admit or deny the allegations of this  
20 paragraph, and denies them on that basis.

21 4. The United States lacks sufficient knowledge to admit or deny the allegations of this  
22 paragraph, and denies them on that basis.

23 5. The United States lacks sufficient knowledge to admit or deny the allegations of this  
24 paragraph, and denies them on that basis.  
25

26 6. The United States lacks sufficient knowledge to admit or deny the allegations of this  
27 paragraph, and denies them on that basis.  
28

1           7. The United States lacks sufficient knowledge to admit or deny the allegations of this  
2 paragraph, and denies them on that basis.

3           8. The United States lacks sufficient knowledge to admit or deny the allegations of this  
4 paragraph, and denies them on that basis.

5           9. The United States lacks sufficient knowledge to admit or deny the allegations of this  
6 paragraph, and denies them on that basis.

7           10. The United States lacks sufficient knowledge to admit or deny the allegations of this  
8 paragraph, and denies them on that basis.

9           11. The United States lacks sufficient knowledge to admit or deny the allegations of this  
10 paragraph, and denies them on that basis.

11           12. The United States lacks sufficient knowledge to admit or deny the allegations of this  
12 paragraph, and denies them on that basis.

13           13. This paragraph contains allegations which constitute a characterization of Cross-  
14 Complainants case to which no response is required. To the extent that a response is required,  
15 the United States lacks sufficient knowledge to admit or deny the allegations of this paragraph,  
16 and denies them on that basis.

17           14. The United States admits that it owns real property, including Edwards Air Force  
18 Base, and has rights to water within the Antelope Valley. The United States lacks sufficient  
19 knowledge to admit or deny the remaining allegations of this paragraph, and denies them on that  
20 basis.

21           15. This paragraph contains allegations which constitute legal conclusions and to which  
22 no response is required. To the extent a response is required, the United States lacks sufficient  
23 knowledge to admit or deny the allegations of this paragraph, and denies them on that basis.

1           16. This paragraph contains allegations which constitute legal conclusions to which no  
2 response is required. The United States lacks sufficient knowledge to admit or deny the  
3 remaining allegations of this paragraph, and denies them on that basis.  
4

5           17. This paragraph contains allegations which constitute legal conclusions to which no  
6 response is required. The United States lacks sufficient knowledge to admit or deny the  
7 remaining allegations of this paragraph, and denies them on that basis.  
8

9           18. The United States lacks sufficient knowledge to admit or deny the allegations of this  
10 paragraph, and denies them on that basis.  
11

12           19. The United States lacks sufficient knowledge to admit or deny the allegations of this  
13 paragraph, and denies them on that basis.  
14

15           20. The United States lacks sufficient knowledge to admit or deny the allegations of this  
16 paragraph, and denies them on that basis.  
17

18           21. The United States admits that the groundwater levels underlying the Antelope Valley  
19 have declined in recent decades. The United States lacks sufficient knowledge to admit or deny  
20 the remaining allegations of this paragraph, and denies them on that basis.  
21

22           22. The United States lacks sufficient knowledge to admit or deny the allegations of the  
23 first sentence of this paragraph, and denies them on that basis. The United States admits the  
24 allegations of the second sentence.  
25

26           23. The United States lacks sufficient knowledge to admit or deny the allegations of this  
27 paragraph, and denies them on that basis.  
28

          24. The United States admits that groundwater pumping can cause land subsidence and  
that groundwater pumping has caused land subsidence in the Antelope Valley. The United States  
lacks sufficient knowledge to admit or deny the remaining allegations of this paragraph, and

1 denies them on that basis.

2       25. This paragraph contains allegations which constitute legal conclusions to which no  
3 response is required. To the extent a response is required, the United States lacks sufficient  
4 knowledge to admit or deny the allegations of this paragraph, and denies them on that basis.  
5

6       26. The United States lacks sufficient knowledge to admit or deny the allegations of this  
7 paragraph, and denies them on that basis.

8       27. The United States admits that State Project water commingles with other  
9 groundwater in the Antelope Valley and that such water augments the natural supply of  
10 groundwater. The United States lacks sufficient knowledge to admit or deny the remaining  
11 allegations of this paragraph, and denies them on that basis.  
12

13       28. The United States lacks sufficient knowledge to admit or deny the allegations of this  
14 paragraph, and denies them on that basis.

15       29. The United States admits that there has been a decline in groundwater levels in the  
16 Antelope Valley and that land subsidence is occurring in the Antelope Valley. The United States  
17 lacks sufficient knowledge to admit or deny the remaining allegations of this paragraph, and  
18 denies them on that basis.  
19

20       30. The United States admits that it pumps and diverts groundwater in the Antelope  
21 Valley and claims an interest in the Antelope Valley groundwater. The United States lacks  
22 sufficient knowledge to admit or deny the remaining allegations of this paragraph, and denies  
23 them on that basis.  
24

25       31. The United States admits that it claims a right to take water, but the United States  
26 lacks sufficient knowledge to admit or deny the remaining allegations of this paragraph, and  
27 denies them on that basis.  
28

1           32. The United States lacks sufficient knowledge to admit or deny the allegations of this  
2 paragraph, and denies them on that basis.

3           33. This paragraph contains allegations which constitute legal conclusions to which no  
4 response is required. To the extent a response is required, the United States lacks sufficient  
5 knowledge to admit or deny the allegations of this paragraph, and denies them on that basis.  
6

7           34. This paragraph contains allegations which constitute legal conclusions to which no  
8 response is required. To the extent a response is required, the United States admits that there are  
9 conflicting claims to groundwater in the Antelope Valley. The United States lacks sufficient  
10 knowledge to admit or deny the remaining allegations of this paragraph, and denies them on that  
11 basis.  
12

13           35. The United States admits that it owns real property in the Antelope Valley and that it  
14 claims a right to pump groundwater. The United States lacks sufficient knowledge to admit or  
15 deny the remaining allegations of this paragraph, and denies them on that basis.  
16

17           36. This paragraph contains allegations which constitute legal conclusions to which no  
18 response is required. To the extent a response is required, the United States lacks sufficient  
19 knowledge to admit or deny the allegations of this paragraph, and denies them on that basis.  
20

21           37. This paragraph contains allegations which constitute legal conclusions to which no  
22 response is required. To the extent a response is required, the United States lacks sufficient  
23 knowledge to admit or deny the allegations of this paragraph, and denies them on that basis.  
24

25           38. This paragraph contains allegations which constitute legal conclusions to which no  
26 response is required. To the extent a response is required, the United States lacks sufficient  
27 knowledge to admit or deny the allegations of this paragraph, and denies them on that basis.  
28

          39-43. As indicated in the subtitle to this First Cause of Action, the allegations in

1 paragraphs 39 to 43 do not apply to the United States. Thus, no response from the United States  
2 to the allegations of these paragraphs is required.

3 44. The United States incorporates by reference the admissions and denials in each and  
4 every preceding paragraph as though fully set forth herein.

5  
6 45. This paragraph contains allegations which constitute legal conclusions to which no  
7 response is required. To the extent a response is required, the United States lacks sufficient  
8 knowledge to admit or deny the allegations of this paragraph, and denies them on that basis.

9  
10 46. This paragraph contains allegations which constitute legal conclusions to which no  
11 response is required. To the extent a response is required, the United States lacks sufficient  
12 knowledge to admit or deny the allegations of this paragraph, and denies them on that basis.

13 47. This paragraph contains allegations which constitute a characterization of Cross-  
14 Complainants case and to which no response is required. To the extent that a response is  
15 required, the United States lacks sufficient knowledge to admit or deny the allegations of this  
16 paragraph, and denies them on that basis.

17  
18 48. This paragraph contains allegations which constitute legal conclusions and to which  
19 no response is required. To the extent a response is required, the United States lacks sufficient  
20 knowledge to admit or deny the allegations of this paragraph, and denies them on that basis.

21 49. This paragraph contains allegations which constitute a characterization of Cross-  
22 Complainants' case and to which no response is required. To the extent that a response is  
23 required, the United States lacks sufficient knowledge to admit or deny the allegations of this  
24 paragraph, and denies them on that basis.

25  
26 50. This paragraph contains allegations which constitute a characterization of Cross-  
27 Complainants' case and to which no response is required. To the extent that a response is  
28

1 required, the United States admits that Cross-Complainants appear to seek the stated judicial  
2 determinations.

3 51. The United States incorporates by reference the admissions and denials in each and  
4 every preceding paragraph as though fully set forth herein.  
5

6 52. This paragraph contains allegations which constitute a characterization of Cross-  
7 Complainants' case and legal conclusions to which no response is required. To the extent that a  
8 response is required, the United States admits that it claims interests and rights to groundwater in  
9 the Antelope Valley. The United States lacks sufficient knowledge to admit or deny the  
10 remaining allegations of this paragraph, and denies them on that basis.  
11

12 53. This paragraph contains allegations which constitute a characterization of Cross-  
13 Complainants' case and legal conclusions to which no response is required. To the extent that a  
14 response is required, the United States lacks sufficient knowledge to admit or deny the  
15 allegations of this paragraph, and denies them on that basis.  
16

17 54. This paragraph contains allegations which constitute legal conclusions to which no  
18 response is required. To the extent a response is required, the United States lacks sufficient  
19 knowledge to admit or deny the remaining allegations of this paragraph, and denies them on that  
20 basis.

21 55. This paragraph contains allegations which constitute a characterization of Cross-  
22 Complainants' case and to which no response is required. To the extent that a response is  
23 required, the United States lacks sufficient knowledge to admit or deny the remaining allegations  
24 of this paragraph, and denies them on that basis.  
25

26 56. The United States incorporates by reference the admissions and denials in each and  
27 every preceding paragraph as though fully set forth herein.  
28



1           57. This paragraph contains allegations which constitute legal conclusions and to which  
2 no response is required. To the extent a response is required, the United States admits that  
3 Cross-Complainants have correctly quoted from California Water Code § 106, but the United  
4 States lacks sufficient knowledge to admit or deny the remaining allegations of this paragraph,  
5 and denies them on that basis.  
6

7           58. The United States admits that California Water Code § 106.5 provides, in part, as  
8 quoted.  
9

10           59. This paragraph contains allegations which constitute legal conclusions to which no  
11 response is required. To the extent a response is required, the United States lacks sufficient  
12 knowledge to admit or deny the allegations of this paragraph, and denies them on that basis.  
13

14           60. This paragraph contains allegations which constitute a characterization of Cross-  
15 Complainants case and legal conclusions to which no response is required. To the extent that a  
16 response is required, the United States admits that an actual controversy has arisen, but the  
17 United States lacks sufficient knowledge to admit or deny the remaining allegations of this  
18 paragraph, and denies them on that basis.

19           61. This paragraph contains allegations which constitute a characterization of Cross-  
20 Complainants' case and to which no response is required. To the extent that a response is  
21 required, the United States admits that the Cross-Complainants seek the stated judicial  
22 determination. The United States lacks sufficient knowledge to admit or deny the remaining  
23 allegations of this paragraph, and denies them on that basis.  
24

25           62. The United States incorporates by reference the admissions and denials in each and  
26 every preceding paragraph as though fully set forth herein.

27           63. The United States admits that State Project water is not native to the basin, but the  
28

1 United States lacks sufficient knowledge to admit or deny the remaining allegations of this  
2 paragraph, and denies them on that basis.

3 64. The United States lacks sufficient knowledge to admit or deny the remaining  
4 allegations of this paragraph, and denies them on that basis.

5 65. The United States lacks sufficient knowledge to admit or deny the allegations  
6 contained in the first sentence of this paragraph, and denies them on that basis. The second and  
7 third sentences of this paragraph contain allegations which constitute legal conclusions to which  
8 no response is required. To the extent a response is required, the United States lacks sufficient  
9 knowledge to admit or deny the allegations of this paragraph, and denies them on that basis.

10 66. This paragraph contains allegations which constitute legal conclusions and to which  
11 no response is required. To the extent a response is required, the United States admits that an  
12 actual controversy has arisen. The United States lacks sufficient knowledge to admit or deny the  
13 remaining allegations of this paragraph, and denies them on that basis.

14 67. This paragraph contains allegations which constitute a characterization of Cross-  
15 Complainants' case and to which no response is required. To the extent that a response is  
16 required, the United States admits that Cross-Complainants seek the stated judicial  
17 determination.

18 68. The United States incorporates by reference the admissions and denials in each and  
19 every preceding paragraph as though fully set forth herein.

20 69. The United States lacks sufficient knowledge to admit or deny the allegations of this  
21 paragraph, and denies them on that basis.

22 70. The United States lacks sufficient knowledge to admit or deny the allegations of this  
23 paragraph, and denies them on that basis.

1  
2 71. This paragraph contains allegations which constitute legal conclusions to which no  
3 response is required. To the extent that a response is required, the United States lacks sufficient  
4 knowledge to admit or deny the allegations of this paragraph, and denies them on that basis.  
5

6 72. This paragraph contains allegations which constitute legal conclusions to which no  
7 response is required. To the extent a response is required, the United States lacks sufficient  
8 knowledge to admit or deny the allegations of this paragraph, and denies them on that basis.  
9

10 73. This paragraph contains allegations which constitute a characterization of Cross-  
11 Complainants case and to which no response is required. To the extent that a response is  
12 required, the United States lacks sufficient knowledge to admit or deny the allegations of this  
13 paragraph, and denies them on that basis.

14 74-78. As indicated in the subtitle to the First Cause of Action, the United States is a  
15 public entity defendant. Thus, as indicated in the subtitle to this Seventh Cause of Action, the  
16 allegations in paragraphs 74 to 78 do not apply to the United States. Therefore, no response from  
17 the United States to the allegations of these paragraphs is required.  
18

19 79-90. Paragraph 91 follows paragraph 78 in the Cross-Complaint. The Cross-  
20 Complaint is missing paragraphs 79-90.

21 91. The United States incorporates by reference the admissions and denials in each and  
22 every preceding paragraph as though fully set forth herein.  
23

24 92. This paragraph contains allegations which constitute legal conclusions to which no  
25 response is required. To the extent a response is required, the United States lacks sufficient  
26 knowledge to admit or deny the allegations of this paragraph, and denies them on that basis.

27 93. This paragraph contains allegations which constitute a characterization of Cross-  
28 Complainants' case to which no response is required. To the extent that a response is required,

1  
2 the United States admits that Cross-Complainants seek the stated judicial determination.

3  
4 First Defense

5 This Court lacks subject matter jurisdiction. There is no waiver of the sovereign  
6 immunity of the United States for this suit under the McCarran Amendment, 43 U.S.C. Sec. 666,  
7 or any other statute.

8  
9 Second Defense

10 The United States is immune from judgment for costs.

11  
12 Third Defense

13 The Cross-Complaint asserts causes of action which are not part of a general stream  
14 adjudication under state or federal law.

15  
16 Fourth Defense

17 The Cross-Complainants have failed to join necessary and indispensable parties.

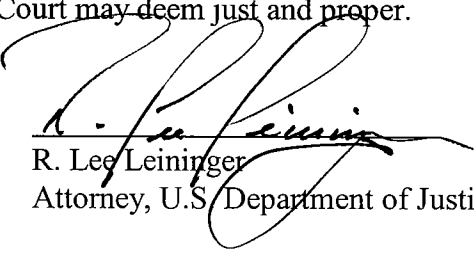
18  
19 Fifth Defense

20 The Cross-Complainants have failed to state a claim upon which relief can be granted.

21 WHEREFORE, the United States prays for judgment as follows:

- 22 1. That Cross-Complainants take nothing by virtue of their Cross-Complaint;  
23 2. That should the Court grant relief pursuant to the Cross-Complaint, the United States'  
24 water rights be determined as superior and senior to all those claimed by other parties;  
25 3. For such other and further relief as the Court may deem just and proper.

26 Dated: February 15, 2006

27   
28 R. Lee Leininger  
Attorney, U.S. Department of Justice

**PROOF OF SERVICE**

I, Linda C. Shumard, declare:

I am a resident of the State of Colorado and over the age of 18 years, and not a party to the within action. My business address is U.S. Department of Justice, Environmental and Natural Resources Section, 999 - 18<sup>th</sup> St., Suite 945, Denver, Colorado 80202.

On February 15, 2006, I caused the foregoing documents described as UNITED STATES' ANSWER TO CROSS-COMPLAINT OF MUNICIPAL PURVEYORS FOR DECLARATORY AND INJUNCTIVE RELIEF AND ADJUDICATION OF WATER RIGHTS to be served on the interested parties in this action as follows:

**SEE ATTACHED SERVICE LIST**

☐

BY ELECTRONIC SERVICE AS FOLLOWS by posting the documents(s) listed above to the Santa Clara County Superior Court website in regard to the Antelope Valley Groundwater matter.

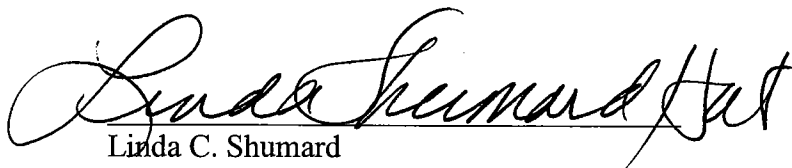
☒

BY MAIL AS FOLLOWS (to parties so indicated on attached service list): By placing true copies thereof enclosed in sealed envelopes addressed as indicated on the attached service list. I

☐

BY OVERNIGHT COURIER: I caused the above-referenced document(s) be delivered to FEDERAL EXPRESS for delivery to the above address(es).

Executed on February 15, 2006, at Denver, Colorado.

  
Linda C. Shumard  
Legal Support Assistant

## SERVICE LIST

BY FED-EX	Clerk of the Superior Court of California, County of Los Angeles County Courthouse 111 North Hill Street Los Angeles, CA 90012-3014	
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Lillian Kauffman, and the Kauffman Family Trust	Stuart I. Schneider, Esq. Law Office of Stuart I. Schneider 250 N. Westlake Blvd., Suite 240 Thousand Oaks, CA 91362	Phone: 805-777-1177 Fax: 805-777-1725
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