

SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

Coordination Proceeding
Special Title (Rule 1550(b))

Judicial Council Coordination
Proceeding No. 4408

**ANTELOPE VALLEY GROUNDWATER
CASES**

**CROSS-DEFENDANT UNITED
STATES' CASE MANAGEMENT
STATEMENT**

Included Actions:

Los Angeles County Waterworks District No. 40 v.
Diamond Farming Co.
Superior Court of California, County of Los Angeles,
Case No. BC 325 201

Date: August 11, 2014
Time: 10:00 a.m.

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

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

Pursuant to the Court's July 18, 2014 Minute Order, the United States hereby submits the following Case Management Conference Statement. The United States concurs and joins in the Public Water Suppliers' (PWS) Case Management Conference Statement, filed August 8, 2014, with one difference. The PWS state that the Wood Class attorney fee claim against the PWS is unresolved. *Id.* at p. 6. The PWS note that this "is the only remaining settlement obstacle." *Id.* at l. 21. The PWS further state that the Wood Class attorney fees issue must be resolved by the Court after the Court's approval of the Settlement Agreement. *Id.* at p. 7, l. 10.

1 The United States believes this issue, as stated earlier in the PWS Case Management
2 Statement at p. 4, ll. 5-6, “requires immediate court supervision and order.” As the sole
3 remaining settlement obstacle, it is imperative that this issue be resolved as soon as possible. It
4 cannot await Court approval of the Settlement Agreement because some parties have indicated
5 an unwillingness to stipulate to the Agreement without advance resolution of the Wood Class fee
6 amount and party responsibility to pay.

7
8 The United States respectfully requests that the parties be ordered into settlement
9 discussions in an attempt to resolve this issue immediately following the conclusion of the Case
10 Management Conference (CMC). The CMC is scheduled for two days. The CMC list of topics
11 is unlikely to consume two days and the parties should take the opportunity to use any or all of
12 the scheduled two days to resolve this outstanding issue.

13 Dated: August 8, 2014

/s/ R. Lee Leininger
R. LEE LEININGER
JAMES J. DuBOIS
ATTORNEYS FOR THE UNITED
STATES OF AMERICA