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11 Attorneys for Cross-Defendant  
12 Copa De Oro Land Company

13 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
14 COUNTY OF LOS ANGELES

15 Coordination Proceeding Special Title  
16 (Rule 1550(b))

17 ANTELOPE VALLEY GROUNDWATER  
18 CASES

19 Included Actions:

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

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

28 Wm. Bolthouse Farms, Inc. v. City of  
Lancaster, Diamond Farming Co. v.  
Lancaster, Diamond Farming Co. v.  
Palmdale Water Dist., Superior Court of  
California, County of Riverside, Case No.  
RIC 353 840, RIC 344 436, RIC 344 668

JUDICIAL COUNCIL COORDINATION  
PROCEEDING NO. 4408

Case No. BC 391869  
Assigned to Hon. Jack Komar

(Santa Clara Case No. 01-05-CV-049053)

PARTIAL OBJECTION AND  
RESERVATION OF RIGHTS OF COPA  
DE ORO LAND COMPANY  
CONCERNING UNITED STATES  
DECLARATIONS

BY FAX

8792/P022713rsb Objection

PARTIAL OBJECTION AND RESERVATION OF RIGHTS CONCERNING U.S. DECLARATIONS



1                                   **PARTIAL OBJECTION AND RESERVATION OF RIGHTS**

2                   TO THE PARTIES AND THEIR ATTORNEYS OF RECORD:

3                   PLEASE TAKE NOTICE that cross-defendant Copa de Oro Land Company objects to  
4 the Declaration Of Gerald T. Boetsch Jr. In Lieu Of Deposition Testimony For Phase 4 Trial,  
5 posted on January 31, 2013, and the Declaration Of Jared Scott In Lieu Of Deposition  
6 Testimony For Phase 4 Trial, posted January 31, 2013 and revised February 8, 2013, as bases  
7 for a claimed federal reserved right. Copa de Oro reserves its rights to dispute the legal import  
8 of the facts stated in those declarations. Copa de Oro does not object to the facts stated in those  
9 declarations for purposes of establishing the United States' water use and property ownership  
10 during the 2000-2012 period.

11 Dated: February 28, 2013

Respectfully submitted,

12                   BARTKIEWICZ, KRONICK & SHANAHAN  
13                   A Professional Corporation

14  
15 By: 

16                   Ryan S. Bezerra

17                   Attorneys for Cross-Defendant Copa de Oro Land  
18                   Company  
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