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EXEMPT FROM FILING FEES
[Gov. Code, § 6103]

8
9 ADDITIONAL PARTIES LISTED ON PAGE 2 HEREOF

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF LOS ANGELES
12

13 **Coordination Proceeding
Special Title (Rule 3.550(c))**

14 **ANTELOPE VALLEY GROUNDWATER
15 CASES**

16 **Included Actions:**

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

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

21 **Wm. Bolthouse Farms, Inc. v. City of
22 Lancaster, Diamond Farming Co. v. City of
Lancaster, Diamond Farming Co. v.
23 Palmdale Water Dist. Superior Court of
California, County of Riverside,
24 consolidated Actions, Case Nos. RIC 353
840, RIC 344 436, RIC 344 668**
25 -----

26 **AND RELATED ACTIONS.**
27
28

Judicial Council Coordination
Proceeding No. 4408

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

**JOINT CASE MANAGEMENT
CONFERENCE STATEMENT OF STATE
OF CALIFORNIA, CITY OF LOS
ANGELES, COUNTY SANITATION
DISTRICT OF LOS ANGELES COUNTY
NOS. 14&20, AND ANTELOPE VALLEY-
EAST KERN WATER AGENCY**

[Assigned for All Purposes to the Honorable
Jack Komar]

Trial Date: May 28, 2013

CMC: April 30, 2013

Time: 9:00 a.m.
Place: Los Angeles County Superior Court
Department 1

Action Filed: October 26, 2005

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Attorneys for Cross-Defendant
COUNTY SANITATION DISTRICT OF
LOS ANGELES COUNTY NOS. 14&20

1 Cross-Defendants, State of California, State of California 50th District Agricultural
2 Association (collectively, State of California), the City of Los Angeles, by and through its
3 Department of Airports, Los Angeles World Airports (LAWA), the County Sanitation Districts of
4 Los Angeles County Nos. 14 and 20 (LA County Sanitation) and Cross-Complainant Antelope
5 Valley-East Kern Water Agency (AVEK) (collectively, Public Overliers) submit the following
6 case management conference statement.

7 On March 25, 2013, this Court held a hearing in this matter. At that hearing and in a
8 subsequent Order filed on April 12, 2013, the Court ordered all parties in this case who have
9 objected or declined to enter into stipulations "to inspect the [other parties' filed] declarations and
10 advise the proponents, no later than April 15, 2013, of any reasons why they do not believe the
11 declarations are accurate or why they cannot otherwise agree to stipulate." Further, Counsel were
12 Ordered to prepare a Proposed Order and post the same for comment and signature.

13 On March 28, 2013, LAWA filed the Proposed Order requested by the Court. To date, the
14 Court has not signed the LAWA Proposed Order. Trial is set in this case for May 28, 2013. The
15 Court has on numerous occasions stated that it did not believe this Trial would involve lengthy
16 testimony from all the parties in the case. The Public Overliers alone expect their witnesses,
17 absent stipulations, to take at least 4 days to complete, including numerous State of California
18 witnesses for its separate agencies. For each party, evidence regarding deeds and pump records
19 will have to be introduced. In addition many parties will require expert and lay testimony. The
20 presentation of the evidence, without stipulations, will be time consuming for each party.

21 To date, the parties have engaged in minimal discovery and without requirements to file
22 objections to the evidence that has been filed with the court, each party is unaware of objections
23 to their evidence or what counter evidence or testimony will be presented at trial against them.
24 This Court has rightfully been concerned with the parties' due process rights in this case.
25 However, without knowledge of objections and counter evidence, the parties are being required to
26 present evidence in a vacuum. For most of the parties, it is unclear what challenges will be
27 presented to their evidence and what particular law or facts are at issue in the trial.
28

1 This Court required all parties to present objections by April 15, 2013, but to date, April
2 15th has passed and few of the parties have responded. Witness and Exhibit lists as well as Trial
3 Briefs and Motions In Limine are to be filed within two weeks. At this point, without knowing
4 what objections the parties have to the evidence that will be submitted, the parties will have to
5 prepare their entire case, a situation the Court was seeking to avoid. The Public Overliers are also
6 concerned about the length of the trial scheduled for May 28, 2013. There are numerous other
7 parties to this case and numerous other parties who are participating in this trial. If the issues and
8 evidence are not narrowed and the majority of the parties are permitted to avoid objections until
9 close to or after the witness lists, exhibit lists and trial briefs must be filed, this will not only
10 severely prejudice many parties, but will make for an unnecessarily drawn out and lengthy trial.

11 The Parties have now had approximately three months to review declarations. Discovery in
12 the form of depositions is nearly complete and the discovery cut-off date has passed. The Public
13 Overliers, therefore, respectfully request that all parties be required to file detailed, specific
14 objections to any declarations they wish to object to, on or before May 3, 2013. The Public
15 Overliers further request that this Court sign LAWA's March 28, 2013 Proposed Order, with a
16 date of May 3, 2013 for when the specific objections must be filed, instead of April 15, 2013.
17 General objections should not be allowed.

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1 Dated: April 26, 2013

OFFICE OF THE ATTORNEY GENERAL
STATE OF CALIFORNIA

2
3
4 By: 

5 NOAH GOLDEN-KRASNER
6 Attorneys for the State of California,
7 Santa Monica Mountains Conservancy,
8 and State of California 50th District
9 Agricultural Association

10 Dated: April __, 2013

ELLISON, SCHNEIDER & HARRIS L.L.P.

11 By: _____

12 CHRISTOPHER M. SANDERS
13 Attorneys for the County Sanitation
14 Districts of Los Angeles County Nos. 14
15 and 20

16 Dated: April __, 2013

BRUNICK, MCELHANEY & KENNEDY
PLC

17 By: _____

18 WILLIAM J. BRUNICK
19 Attorneys for the ANTELOPE VALLEY-
20 EAST KERN WATER AGENCY

21 Dated: April __, 2013

Kronick, Moskovitz, Tiedemann & Girard

22 By: _____

23 JANET K. GOLDSMITH
24 Attorneys for the CITY OF LOS ANGELES
25 BY AND THROUGH ITS DEPARTMENT
26 OF AIRPORTS, LOS ANGELES WORLD
27 AIRPORTS
28

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6 Attorneys for the State of California,
7 Santa Monica Mountains Conservancy,
8 and State of California 50th District
9 Agricultural Association

10 Dated: April __, 2013

ELLISON, SCHNEIDER & HARRIS L.L.P.

11 By: _____

12 CHRISTOPHER M. SANDERS
13 Attorneys for the County Sanitation
14 Districts of Los Angeles County Nos. 14
15 and 20

16 Dated: April 29, 2013

BRUNICK, MCELHANEY & KENNEDY
PLC

17 By: Wm J Brunick

18 WILLIAM J. BRUNICK
19 Attorneys for the ANTELOPE VALLEY-
20 EAST KERN WATER AGENCY

21 Dated: April __, 2013

Kronick, Moskovitz, Tiedemann & Girard

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27 AIRPORTS
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3


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STATE OF CALIFORNIA

4 By: _____

NOAH GOLDEN-KRASNER
Attorneys for the State of California,
Santa Monica Mountains Conservancy,
and State of California 50th District
Agricultural Association

8 Dated: April 26, 2013
9

ELLISON, SCHNEIDER & HARRIS L.L.P.

10 By: 
11 CHRISTOPHER M. SANDERS
12 Attorneys for the County Sanitation
13 Districts of Los Angeles County Nos. 14
and 20

14 Dated: April __, 2013
15

BRUNICK, MCELHANEY & KENNEDY
PLC

16 By: _____
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WILLIAM J. BRUNICK
Attorneys for the ANTELOPE VALLEY-
EAST KERN WATER AGENCY

18
19 Dated: April __, 2013
20

Kronick, Moskovitz, Tiedemann & Girard

21 By: _____

JANET K. GOLDSMITH
Attorneys for the CITY OF LOS ANGELES
BY AND THROUGH ITS DEPARTMENT
OF AIRPORTS, LOS ANGELES WORLD
AIRPORTS

1 Dated: April __, 2013

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STATE OF CALIFORNIA

4 By: _____

NOAH GOLDEN-KRASNER
Attorneys for the State of California,
Santa Monica Mountains Conservancy,
and State of California 50th District
Agricultural Association

8 Dated: April __, 2013

ELLISON, SCHNEIDER & HARRIS L.L.P.

11 By: _____

CHRISTOPHER M. SANDERS
Attorneys for the County Sanitation
Districts of Los Angeles County Nos. 14
and 20

14 Dated: April __, 2013

BRUNICK, MCELHANEY & KENNEDY
PLC

17 By: _____

WILLIAM J. BRUNICK
Attorneys for the ANTELOPE VALLEY-
EAST KERN WATER AGENCY

19 Dated: April 26, 2013

Kronick, Moskovitz, Tiedemann & Girard

21 By: Janet K. Goldsmith

JANET K. GOLDSMITH
Attorneys for the CITY OF LOS ANGELES
BY AND THROUGH ITS DEPARTMENT
OF AIRPORTS, LOS ANGELES WORLD
AIRPORTS

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I am employed in the County of the San Bernardino, State of California. I am over the age of 18 and not a party to the within action; my business address is 1839 Commercenter West, San Bernardino, California 92408-3303.

On April 29, 2013, I served the foregoing document(s) described as: **JOINT CASE MANAGEMENT CONFERENCE STATEMENT OF STATE OF CALIFORNIA, CITY OF LOS ANGELES, COUNTY SANITATION DISTRICT OF LOS ANGELES COUNTY NOS. 14&20, AND ANTELOPE VALLEY-EAST KERN WATER AGENCY** on the interested parties in this action served in the following manner:

■ **BY ELECTRONIC SERVICE AS FOLLOWS** by posting the document(s) listed above to the Santa Clara website in the action of the *Antelope Valley Groundwater Litigation*, Judicial Council Coordination Proceeding No. 4408, Santa Clara Case No. 1-05-CV-049053.

X (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on April 29, 2013, at San Bernardino, California.


P. Jo Anne Quihuis