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*Exempt from filing fee pursuant to
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ANTELOPE VALLEY-EAST KERN WATER AGENCY

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

Coordination Proceeding
Special Title (Rule 1550(b))

Judicial Council Coordination Proceeding
No. 4408

**ANTELOPE VALLEY
GROUNDWATER CASES**

**Santa Clara Case No.
1-05-CV-049053**
The Honorable Jack Komar, Dept.17

Included Actions:

**DECLARATION OF ROBERT A.
PARRIS IN SUPPORT OF JOINT
OPPOSITION OF PUBLIC AND
PRIVATE LANDOWNERS TO THE
MUTUALS' MOTION TO INTERPRET
THE JUDGMENT**

Los Angeles County Waterworks District
No. 40 vs. Diamond Farming Company, a
corporation, Superior Court of California,
County of Los Angeles, Case No.
BC325201;

Los Angeles County Waterworks District
No. 40 vs. Diamond Farming Company, a
corporation., Superior Court of California,
County of Kern, Case No. S-1500-CV-254-
348;

Wm. Bolthouse Farms, Inc. vs. City of
Lancaster, Diamond Farming Company, a
corporation, vs. City of Lancaster, Diamond
Farming Company, a corporation vs.
Palmdale Water District, Superior Court of
California, County of Riverside, Case Nos.
RIC 353840, RIC 344436, RIC 344668.

Date: May 25, 2014
Time: 9:00 a.m.
Room: Room 222, Los Angeles
Judge: Hon. Jack Komar

DECLARATION OF ROBERT A. PARRIS IN SUPPORT OF OPPOSITION TO MUTUALS' MOTION TO INTERPRET JUDGMENT

1 _____
2 ROBERT A. PARRIS declares and states:

3 1. I am an attorney licensed to practice in all courts of the State of California and, also, an
4 elected member of the Board of Directors of the Antelope Valley - East Kern Water Agency
5 (AVEK), a party to these consolidated proceedings. I have personal knowledge of all of the facts
6 and matters set forth below and, if called as a witness, I could and would testify competently
7 thereto.

8 2. AVEK's Board of Directors has appointed me to serve as its representative on the
9 Watermaster Board. Because I have been given that assignment and because AVEK is deeply
10 committed to expeditious implementation of all of the provisions of the Judgment and Physical
11 Solution, I have been personally involved in the scheduling and conduct of each of five public
12 meetings relating to the formation of the Watermaster Board (Section 18.1.1) and, specifically,
13 the election of the two remaining landowner representatives to the Watermaster Board.

14 3. To facilitate the landowners' efforts to elect their two representatives and, also, to
15 acquaint and familiarize members of the public with key provisions of the Court's Judgment and
16 Physical Solution, AVEK helped organize and sponsored public meetings which were held on
17 January 21, 2016 (in the Lancaster City Hall Council Chambers); on February 17, 2016 (in the
18 Lancaster City Hall Council Chambers); on March 16, 2016 (in the Lancaster City Hall Council
19 Chambers); on March 31, 2016 (at the offices of the Palmdale Water District); and on April 13,
20 2016 (at the offices of the Palmdale Water District). Copies of the respective notices for those
21 meetings (each of which were posted on the Court's Website and e-mailed to all known
22 interested parties) are attached as Exhibits 1 through 5 to Dwayne Chisam's declaration filed
23 on May 12, 2016. Copies of the sign-in sheets for each of those meetings are attached as
24 Exhibits 6 through 10 to Mr. Chisam's declaration. Attached as Exhibits 12 through 15 to Mr.
25 Chisam's declaration are true copies of the Minutes of the February 17, 2016, March 16, 2016,
26 March 31, 2016 and April 13, 2016 meetings.

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1 4. In doing so, AVEK's sole intention was to help familiarize members of the public with the
2 provisions of the Court's Judgment and Physical Solution entered on December 23, 2015, and,
3 also, to provide assistance to the landowners identified in Exhibit 4 of the Judgment in
4 formulating a process for the election of the two landowner representatives to the Watermaster
5 Board.

6 5. Contrary to suggestions made in the Mutuels' motion and the declarations originally filed
7 in support of their motion, AVEK did not dominate those meetings, nor did it attempt to
8 influence anyone as to who should be elected as the landowner representatives to the
9 Watermaster Board. Someone had to organize and publicize the meetings and prepare agendas
10 for the meetings; at the request of a number of landowner parties, that lot fell to AVEK.
11 AVEK's intention was solely to act as a facilitator and intermediary to help move the process
12 along. Indeed, during one of the meetings and at the request of the landowner parties, AVEK's
13 representatives (including myself), WD40's representative, a representative from another public
14 water supplier, and the attorneys present, all left the meeting -- so the landowner parties could
15 confer privately among themselves about the process for electing the two landowner
16 representatives to the Watermaster Board.

17 6. The Mutuels' motion suggests that certain of the parties have already reached an
18 agreement regarding the selection of the Watermaster Engineer. AVEK is not party to any such
19 agreement, nor am I aware of any such agreement.

20 7. The basic rules and procedures for nominating and electing the two landowner
21 representatives have now been agreed to by almost all of the participants and the appointed
22 Landowner Steering Committee. Those rules and procedures and the nomination form are
23 collectively attached as Exhibit 16 to Mr. Chisam's.

24 8. It is true that during the meetings differing views were expressed as whether the two
25 landowner representatives should reflect different interests. Neither AVEK nor I took a position
26 on that issue, except to point the participants to the provisions of Section 18.1.1 of the Judgment.
27 My role and that of AVEK has been merely to act as facilitator and intermediary between the
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DECLARATION OF ROBERT A. PARRIS IN SUPPORT OF OPPOSITION TO MUTUALS' MOTION TO INTERPRET JUDGMENT

1 landowner parties in this process; AVEK's actions during each of the meetings were neutral as
2 to the competing landowner interests, entirely transparent, and fair to all. Indeed, the
3 declarations filed by the Mutuels on May 13, 2016, confirm and illustrate the trademark
4 "transparency" of each of the meetings.

5 I declare under penalty of perjury under the laws of the State of California that the
6 foregoing is true and correct, and that this declaration was executed in Lancaster, California, on
7 May 18, 2016.

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10 ROBERT A. PARRIS
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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.

On May 20, 2016, I served the foregoing document(s) described as:
**DECLARATION OF ROBERT A. PARRIS IN SUPPORT OF JOINT
 OPPOSITION OF PUBLIC AND PRIVATE LANDOWNERS TO THE MUTUALS’
 MOTION TO INTERPRET THE JUDGMENT** on the interested parties in this action
 served in the following manner:

XX 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 May 20, 2016, at San Bernardino, California.


Julianne Hernandez