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

Coordinated Proceedings
Special Title {Rule 1550 (b)}

) Judicial Council Coordination
) Proceeding No. 4408

**ANTELOPE VALLEY GROUNDWATER
CASES**

) Santa Clara Case No. 1-05-CV-049053
) Assigned to Hon. Jack Komar

Included Actions:

) **REQUEST TO TAKE JUDICIAL NOTICE
FILED CONCURRENTLY WITH BLUM
TRUST'S NOTICE OF MOTION & MOTION
FOR SUMMARY JUDGMENT/SUMMARY
ADJUDICATION OF ISSUES
[Evidence Code §451; 453; & 453]**

Los Angeles County Waterworks District
No. 40 v. Diamond Farming Co.

Los Angeles County Superior Court
Case No. BC 325 201

Los Angeles County Waterworks District
No. 40 v. Diamond Farming Co.

Kern County Superior Court
Case No. S-1500-CV-254-348

) Hearing Date: December 22, 2014
) Time: 10:00 a.m.
) Dept. No.: TBD
) Judge: Hon. Jack Komar

Wm. Bolthouse Farms, Inc., v. City of
Lancaster; Diamond Farming Co. v. City of
Lancaster; Diamond Farming Co. v. City of
Palmdale Water District.

Riverside County Superior Court
Consolidated Action Nos. RIC 344 840,
RIC 344 436, RIC 344 668

AND RELATED CROSS-ACTIONS

TO ALL PARTIES AND TO THEIR RESPECTIVE ATTORNEYS OF RECORD:

Cross-Defendant BLUM TRUST, hereby requests that this Court take judicial notice of the following matters and materials pursuant to *Evidence Code* §§451; 452; & 453 for consideration in conjunction with BLUM TRUST'S Motion for Summary Judgment/Summary Adjudication of Issues:

DESCRIPTION OF DOCUMENTS

EXHIBITS

- | | |
|--|-----|
| 1. (1) Recorded in Official Records of Los Angeles County, CA, on BLUM TRUST's parcels: (1 & 2) APNs 3384-009-001 & 3384-009-006 <i>Individual Grant Deed of Sheldon R. Blum</i> filed on 7/25/1985; <i>Trust Transfer Deed</i> to Sheldon R. Blum Trustee of the 1998 Sheldon R. Blum Family Trust, with attached Exhibit "A", and Assessor's Plot Map filed on 11/4/1998; (3 & 4) APNs 3384-020-012 & 3384-020-013 <i>Trust Transfer Deed</i> to Sheldon R. Blum Trustee of the 1998 Sheldon R. Blum Family Trust with attached Assessor's Plot Map filed on 11/4/1998; (5) APN 3262-016-011 <i>Trust Transfer Deed</i> to Sheldon R. Blum, Trustee of the 1998 Sheldon R. Blum Family Trust with attached Assessor's Plot Map filed on 11/4/1998. | "A" |
| 2. <i>California Department of Water Resources Southern District, Facsimile Transmittal Sheet attached to two (2) Water Well Index Cards</i> for BLUM TRUST parcels designated as Water Wells: <u>07N 11W-24C01 on APN 3384-009-001; & 7N 11W-24F01 on APN 3384-009-006.</u> | "B" |
| 3. <i>Declaration of Anthony L. Leggio In Lieu of Deposition Testimony For Phase 4 Trial</i> dated 1/30/2013 with attachment [redacted] Ex. A 'APNs & Acreage' Ex. "F", 'Groundwater Production In Acre Feet of Water' from pumping designated water wells AVOL 14-3N; AVOL 14-3S; & LAID 13-3, for Years 2001-2011; & Ex. "M" 'Appendix D-3: Table 4 Applied Crop Water Duty & Irrigation Efficiency Values'. (Excerpts) | "C" |
| 4. <i>Addendum Exhibits P-1 And P-2 To Declaration of Anthony L. Leggio In Lieu of Deposition Testimony For Phase 4 Trial</i> dated 5/13/2013, Exhibit "P-1", Crop Rotation, & Exhibit "P-2" Crop Legend Map which identifies BLUM TRUST leased parcels in relation to AVOL & LAID water well parcels. (Excerpts) | "D" |
| 5. <i>Summary of Applied Crop Water Duties Antelope Valley Area of Adjudication</i> , admitted into evidence during Phase 3 Trial as Exhibit 58, through testimony of PUBLIC WATER SUPPLIERS' Expert Witness Mr. Joseph Scalnanini. (<i>id.</i> aka Appendix D-3: Table 4' 'Applied Crop Water Duty & Irrigation Efficiency Values' in Phase 4 Trial Discovery. (See Ex. "C" <i>supra</i>). | "E" |
| 6. <i>First Amended Cross-Complaint of PUBLIC WATER SUPPLIERS For</i> | "F" |

1 *Declaratory Relief And Injunctive Relief & Adjudication of Water Rights*, filed on or
2 about 1/10/2007.

3 7. *BLUM TRUST's Answer to Complaint/Cross-Complaint of PUBLIC WATER* "G"
4 *SUPPLIERS For Declaratory Relief And Injunctive Relief & Adjudication of Water*
Rights filed on 12/20/2007.

5 8. *Stipulation of BLUM TRUST and PUBLIC WATER SUPPLIERS FOR PHASE* "H"
6 *4 TRIAL REGARDING 2011 & 2012 Water Use* filed on 5/23/2013.

7 9. *Declaration of Tracy M. Saiki In Lieu of Deposition Testimony For Phase 4* "I"
8 *Trial; Stipulation To Dismiss Wm. Bolthouse Farms, Inc. From Litigation With*
No Prejudice to Bolthouse Properties, LLC filed on 1/31/2013; (Excerpts).

9 10. *PUBLIC WATER SUPPLIERS Case Management Statement* filed on or about "J"
10 1/15/2013.

11 11. *CITY OF LOS ANGELES Proposal Concerning Form Discovery* filed on "K"
12 11/20/2012.

13 12. *Richard Wood's Supplemental Case Management Conference Statement* filed "L"
14 on 8/8/14 for August 11, 2014 hearing, without Exhibit 1.M.

15 13. Global Stipulation For Entry of Judgment & Physical Solution. "M"

(Not Available)

16 14. California Constitution, Article 10, Section 2 'Water'.

17 15. California Constitution, Article I, §7(a).

18 16. United States Constitution 14th & 5th Amendments.

19 Pursuant to *Cal. Rules of Court, Rule 3.1306(c)*, the parties are hereby provided with true
20 and correct copies of the above-described exhibit documents of which judicial notice is requested,
21 which are collectively attached hereto.

22 Dated: October 5, 2014

Respectfully submitted,
Law Offices of Sheldon R. Blum

23 By: 
24 Sheldon R. Blum, Esq.
25 Attorney For BLUM TRUST