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8 Attorneys for Intervenor  
9 45MG 8ME LLC, a Delaware limited liability  
10 company

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
12 **COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

13 Coordination Proceeding  
14 Special Title (Rule 1550(b))

15 **ANTELOPE VALLEY**  
16 **GROUNDWATER CASES**

17 Including Consolidated Actions:

18 Los Angeles County Waterworks District  
19 No. 40 v. Diamond Farming Co.; Superior  
20 Court of California, County of Los  
21 Angeles, Case No. BC391869 (formerly  
22 BC325201);

23 Los Angeles County Waterworks District  
24 No. 40 v. Diamond Farming Co.; Superior  
25 Court of California, County of Kern, Case  
26 No. S-1500-CV-254348;

27 Wm. Bolthouse Farms, Inc. v. City of  
28 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  
353840, RIC 344436, RIC 344668;

AND RELATED ACTIONS.

Case No. Judicial Council Coordination  
Proceeding No. 4408

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

**DECLARATION OF THEODORE  
CHESTER, JR. IN SUPPORT OF  
MOTION TO INTERVENE IN  
JUDGMENT**

(Filed concurrently with the Notice of  
Motion and Motion to Intervene in  
Judgment; Memorandum of Points &  
Authorities in support of Motion to  
Intervene; Declaration of Veena P.  
Beglinger in support of Motion to  
Intervene; and [Proposed] Order)

Hearing Date: To Be Set By the Court  
Time: To be Set By the Court  
Judge: Hon. Jack Komar  
Dept. 17

[Hearing to be conducted by CourtCall]

I, THEODORE A. CHESTER, JR, declare as follows:

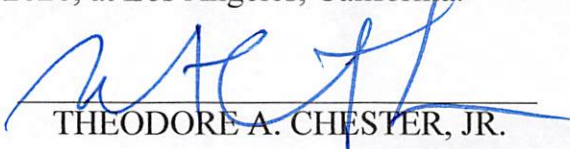
1. I am counsel of record for Bruce Burrows and 300 A 40 H, LLC, a  
California limited liability company, parties to the within action, and as such, have the

1 authority to make this declaration. I am duly licensed to practice law in the State of  
2 California. I have personal knowledge of the matters set forth herein, and if called as a  
3 witness, could and would competently testify thereto.

4 2. Prior to filing this Declaration, on April 27, 2026, I spoke with Mr. Craig  
5 Parton, General Counsel for the Antelope Valley Watermaster. I informed Mr. Parton that  
6 45MG 8ME LLC's Motion to Intervene in the Judgment in this Action and supporting  
7 documents were near completion, and I requested confirmation that the Watermaster  
8 would stipulate to the Motion. In response thereto, Mr. Parton informed me that, rather  
9 than a stipulation, if the Watermaster determined the Motion was acceptable, *the*  
10 *Watermaster would file a Notice of Non-Opposition to the entry of an Order granting*  
11 *45MG 8ME LLC, a Delaware limited liability company, Motion to Intervene in the*  
12 *Judgment.*

13 I declare under penalty of perjury under the laws of the State of California that the  
14 foregoing is true and correct.

15 Executed on May 6, 2026, at Los Angeles, California.

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18 THEODORE A. CHESTER, JR.

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