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Attorneys for BARREL SPRINGS
PROPERTIES, LLC

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

Coordination Proceeding
Special Title (Rule 3.550 (fka Rule 1550(b)))

**ANTELOPE VALLEY GROUNDWATER
CASES**

Including Consolidated Actions:

REBECCA LEE WILLIS, on behalf of herself
and all others similarly situated,

Plaintiff,

v.

LOS ANGELES COUNTY WATERWORKS
DISTRICT NO. 40, et al.

Defendants

RICHARD A. WOOD, an individual, on behalf
of himself and all others similarly situated,

Plaintiff,

v.

LOS ANGELES COUNTY WATERWORKS
DISTRICT NO. 40, et al.

Defendants.

AND RELATED ACTIONS

Judicial Council Coordination Proceeding No.
4408

Santa Clara Case No. 2005-1-CV-049053
Los Angeles Superior Court
Case Nos. BC364553 and BC391869

Assigned to the Hon. Jack Komar
Santa Clara Superior Court

BARREL SPRINGS PROPERTIES, INC.'S
NOTICE OF LODGING AND LODGING OF
ADDITIONAL EXHIBITS IN SUPPORT OF
MOTION FOR ACTION AND
IMPLEMENTATION BY THE PEOPLE
CONCERN, INC. AS AGENT FOR BARREL
SPRINGS PROPERTIES, LLC.

Date: October 18, 2023
Time: 9:00 a.m.
Location: Dept. 3
Santa Clara Superior Court
191 North First Street
San Jose, CA 95113

TO THE HONORABLE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD:
PLEASE TAKE NOTICE THAT, pursuant to this Court's September 19, 2023 Order setting
Evidentiary Hearing, Barrel Springs Properties, LLC ("Barrel Springs") hereby lodges additional
Exhibit Nos. 15 – 38 in support of its Motion for Action and Implementation by the People
Concern, Inc. as agent for Barrel Springs Properties, LLC.

Barrel Springs' additional Exhibit Nos. 15 – 38 consist of records downloaded from the (1)
Palmdale Water District's website; (2) records returned by Antelope Valley Water Master
("AVWM") on October 10, 2023 in response to Barrel Springs' August 25, 2023 Public Records
Act request and (3) and records returned by the Antelope Valley-East Kern Water Agency
("AVEK") on September 14, 2023 in response to Barrel Springs' August 25, 2023 Public Records
Act Request. (See appended Declaration of Rosslyn Hummer ("Hummer") at ¶¶ 2, 3.)

To facilitate the orderly presentation of evidence at hearing on October 18, 2023, Barrel
Springs and AVWM are finalizing stipulations as to the authenticity and admissibility of
additional Exhibits both parties intend to introduce at hearing. (Hummer Decl. ¶ 9.) To further
facilitate the order presentation of evidence at hearing on October 18, 2023, Barrel Springs Bates
labeled the records produced by AVEK on September 14, 2023 and is in the process of Bates
labeling the October 10, 2023 records produced by AVWM. (Hummer Decl. ¶¶ 6, 7.) Barrel
Springs will provide an updated Exhibit list with complete Bates numbers prior to hearing.
(Hummer Decl. ¶ 8.)

October 18, 2023 -Evidentiary Hearing

Barrel Springs Properties, LLC's Exhibit List with Supplemental Exh. Nos. 15 - 38

Designation	Date	Document
A.		AVWM Resolution No. R-23-06 (Long Valley Road, L.P.) (Exhibit to Barrel Springs' Reply RJN)
B.		AVWM Resolution No. R-23-50 (Banuk) Exhibit to Barrel Springs' Reply RJN)
1.	2023-06-16	C. Collins Response to Emails from Craig A. Parton
2.	2023-05-08	C. Collins Letter to Craig A. Parton
3.	2023-04-26	Minutes from AVWM April 26, 2023 Meeting (Approved 6/28/23)

Designation	Date	Document
4.	2023-04-26	Nathan Metcalf's Remarks at April 26, 2023 Meeting
5.	2023-01-18	AVWM Advisory Committee Meeting Agenda (excerpts)
6.	2022-11-30	Email from D. Larson to K. White 2:55pm
7.	2022-11-30	Email from K. White to D. Larson 2:23pm
8.	2022-11-30	Email from K. White to D. Larson 2:02pm
9.	2022-11-30	Email from D. Larson to K. White 10:42am
10.	2022-11-21	Email from K. White to D. Larson
11.	2022-11-17	Email from K. White to D. Larson
12.	2022-09-30	New Production Application
13.	2015-12-23	Judgment (includes Judgment and Physical Solution Adjudicating Antelope Valley Groundwater Basin)
14.	2015-12-23	Judgment Approving Small Pumper Class
15.		Kathy MacLaren's facebook page (downloaded 10.13.23)
16.	2023-03-22	Palmdale Water District Agenda for March 27, 2023 Meeting
17.	2023-03-27	Palmdale Water District Agenda Report Item No. 7.5 – Consideration and Possible Action on Letter of Intent with Barrel Springs Farms for the Protection of Palmdale Ditch
18.	2023-03-27	Palmdale Water District Approved Minutes for March 27, 2023 Board Meeting
19.	2023-04-05	Palmdale Water District Agenda for April 10, 2023 Meeting
20.	2023-04-10	Palmdale Water District Agenda Report Item No 7.4 – Consideration and Possible Action on Agreement with Barrel Springs Farms for the Protection of Palmdale Ditch
21.	2023-04-10	Palmdale Water District Approved Minutes for April 10, 2023 Meeting
22.	2023-04-12	Email chain from John Maceri to Watermaster Board members: Russ Bryden & Kathy MacLaren
23.	2022-11-17 to 2022-12-12	Email chain between Watermaster Engineer and Palmdale Water District Bates AVEK PRA 001-004
24.	2022-11-17 to 2022-11-20	Email chain between Palmdale Water District & AVEK Bates AVEK PRA 053-056
25.	2022-10-05 to 2022-10-11	Email exchange between Larson (Barrel Springs) and Fitzpatrick (AVWM)

Designation	Date	Document
		Bates AVEK PRA 116-117
26.	2022-10-13	Email Fitzpatrick (AVWM) to Larson (Barrel Springs) re Delay to December AVWM Board Meeting Bates AVEK PRA 120
27.	2022-10-11 & 12	Email exchange among Wells, Stanin & White (AVWM Engineer)
28.	2022-11-23	Email Montoya (Hallmark – AVWM Administrator) to Fitzpatrick (AVEK – former AVWM Administrator) re December Board Packets
29.	2022-12-01	Email exchange Stanin & White (AVWM Engineer)
30.	2022-12-01	Email Stanin to White (AVWM Engineer)
31.	2023-01-11	Email Stanin to White & Wells (AVWM Engineer)
32.	23-01-24	Email Stanin (AVWM Engineer) & Montoya (AVWM Administrator)
33.	2023-01-25	Email Stanin to Wells (AVWM Engineer)
34.	2023-02-07	Email exchange Stanin & Wells (AVWM Engineer)
35.	2023-04-19	Screenshot Wells (AVWM Engineer) text with Joshua Montoya (AVWM Administrator)
36.	2023-04-26	Screenshot – Meeting Notes
37.	2023-05-04	Email Wells to Stanin (AVWM Engineer)
38.	2023-05-24	Email exchange Wells & Stanin (AVWM Engineer)

DATED: October 13, 2023

HANSON BRIDGETT LLP

By:

CLAIRE H. COLLINS

ROSSLYN HUMMER

DAVID C. CASARRUBIAS

Attorneys for BARREL SPRINGS PROPERTIES,
LLC

DECLARATION OF ROSSLYN HUMMER

I, Rosslyn Hummer, declare as follows:

1. I am an attorney admitted to practice before this Court. I am Counsel with Hanson Bridgett LLP, attorneys of record for The People Concern, Inc. and Barrel Springs Properties, LLC ("Barrel Springs"). I have personal knowledge of the facts set forth herein and, if called as a witness, could and would competently testify to the matters stated herein.

2. On August 25, 2023, I made Public Records Act requests to the

a. Antelope Valley Water Master ("AVWM");

b. Antelope Valley-East Kern Water Agency ("AVEK"); and

c. Palmdale Water District ("PWD").

3. AVEK returned document responsive to Barrel Springs' Public Records Act request on September 14, 2023.

4. AVWM returned document responsive to Barrel Springs' Public Records Act request on October 10, 2023.

5. PWD responded to Barrel Spring' Public Records Act request on September 5, 2023 but to date has not provided *any documents* responsive to the request.

6. To facilitate the integrity of AVEK's Public Records produced to Barrel Springs on September 14, 2023, I caused my support staff to Bates label the records, with legend AVEK PRA 001 – *nnn*. I provided a set of these Bates labeled documents to Craig Parton, counsel to AVWM.

7. To facilitate the integrity of AVWM's Public Records produced to Barrel Springs on October 10, 2023, I caused my support staff to Bates label the records, with legend AVWM PRA 0001 – *nnn*. This labeling is not complete as of the date and time of execution of this Declaration. As soon as the labeling is complete, I will provide a set of these Bates labeled AVWM return to Barrel Springs' Public Records Act request to Mr. Parton.

8. I also will lodge a set of the Bates labeled AVWM records to the Court prior to hearing on October 18, 2023.

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9. Mr. Parton and I are in the process of finalizing a stipulation to the authenticity and admissibility of the AVEK and AVWM records provided in response to my Public Records Act requests.

10. In addition to obtaining public records from AVEK and AVWM, I downloaded public records relating to the PWD Board's action on the Letter of Intent between Barrel Springs and PWD relating to the property that is the location of Barrel Sprints' New Production Application and related Minutes. True and correct copies of these records—available on PWD's website, located at <https://www.palmdalewater.org/> are lodged as Exhibit Nos. 17 and 18.

11. I also downloaded public records relating to the PWD Board's action on the Agreement between Barrel Springs and PWD's Board relating to the property that is the location of Barrel Sprints' New Production Application and related Minutes. True and correct copies of these records—available on PWD's website, located at <https://www.palmdalewater.org/> are lodged as Exhibit Nos. 20 and 21.

12. And, I caused by research staff to download the facebook page of Kathy MacLaren, which is linked to her profile as a Board Member of Palmdale Water District, which is found on the PWD website. True and correct copies of screen shots of Ms. MacLaren's facebook page are lodge as Exhibit No. 15.

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

Executed on this 13th day of October, 2023, at Los Angeles, California.

Rosslyn Hummer

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STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

On October 13, 2023, I served true copies of the following document(s) described as BARREL SPRINGS PROPERTIES, INC.'S NOTICE OF LODGING AND LODGING OF ADDITIONAL EXHIBITS IN SUPPORT OF MOTION FOR ACTION AND IMPLEMENTATION BY THE PEOPLE CONCERN, INC. AS AGENT FOR BARREL SPRINGS PROPERTIES, LLC with Exhibits 15 through 38, on the interested parties in this action as follows:

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


Linda M. DeRosa