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

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

13 **ANTELOPE VALLEY GROUNDWATER**
14 **CASES**

Including Consolidated Action:

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

17 Plaintiff,

18 v.

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

21 Defendants.
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23

24 **AND RELATED ACTIONS**
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Judicial Council Coordination Proceeding No.
4408

Santa Clara Case No. 1-05-CV-049053
Los Angeles Superior Court
Case No. BC391869

Assigned to the Hon. Beth McGowan
Santa Clara Superior Court
Dept.: 17C

DECLARATION OF CLAIRE COLLINS IN
SUPPORT OF MOTION BY THE PEOPLE
CONCERN, INC. AS AGENT FOR SMALL
PUMPER CLASS MEMBER BARREL
SPRINGS PROPERTIES, LLC FOR ACTION
AND IMPLEMENTATION OF
WATERMASTER ENGINEER
RECOMMENDATION OF APPROVAL OF
BARREL SPRINGS PROPERTIES, LLC'S
SEPTEMBER 30, 2022 NEW PRODUCTION
APPLICATION

*Filed concurrently with Notice of Motion and
Motion by The People Concern for Approval of
New Production, Declarations of David W.
Larson, John Maceri, Nathan A. Metcalf, Toby
Waxman, and Compendium of Evidence*

DECLARATION OF CLAIRE H. COLLINS

I, Claire H. Collins, declare as follows:

1. I am an attorney duly admitted to practice before this Court. I am a partner with Hanson Bridgett LLP, attorneys of record for Barrel Springs Properties, LLC and The People Concern, Inc. 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 May 25, 2023 I met with Antelope Valley Watermaster counsel Craig A. Parton, board chair Robert Parris, board vice chair Kathy MacLaren, and alternate member Matt Knudsen, together with client representatives John Maceri, CEO of The People Concern, and Toby Waxman, consultant to The People Concern.

3. I set up the meeting between the parties with general counsel Parton for the purpose of better understanding the basis of Ms. MacLaren's "no" vote and to provide any additional information to her or other Board Members, as requested in my letter of May 8, 2023, a true and correct copy of which is attached as **Exhibit 2** to the concurrently-filed Compendium of Evidence ("Compendium"), in which I stated in pertinent part:

Vice Chairperson MacLaren refused to state why she voted to deny the application.

Here, there is no basis in the record to deny the application. This is textbook arbitrary and capricious decision-making unrelated to any evidence in the record, and therefore subject to reversal by the Court. When asked why she denied the application, Vice Chairperson MacLaren refused to answer, leaving a clear record that there was no basis for the denial.

We are happy to provide any additional information requested by the Board or to meet with individual Board Members, including Vice Chairperson MacLaren, to clarify any questions she may have about the new production application or the project in general.

4. At the meeting, The People Concern answered numerous questions from Mr. Parris that were unrelated to the safe yield of, or material injury to, the groundwater basin, including questions related to the operations of the farmworker housing facility and where the residents

1 would be drawn from geographically. Additional questions related to issues already answered in
2 the engineering report, or irrelevant to material injury were raised and reiterated in Mr. Parton's
3 subsequent email to me dated June 2, 2023 and to which I responded on June 16, 2023, a true and
4 correct copy of which is attached as **Exhibit 1**.

5 5. After some amount of questioning from Mr. Parris, my clients and I asked Ms.
6 MacLaren to more clearly state the basis of her "no" vote. She refused to provide any facts to
7 support her "no" vote despite repeated requests. Mr. Parris then returned to a line of questioning
8 unrelated to safe yield or material injury. At that point, my clients and I determined that there was
9 no chance for meaningful discussion, I indicated that we were done with the meeting, and Ms.
10 Waxman and I left the conference room and I asked to speak to Mr. Parton outside the conference
11 room.

12 6. Mr. Maceri remained in the conference room for a few minutes following my
13 departure and when I was perhaps 40 feet away, I heard Ms. MacLaren yelling from the
14 conference room. When Mr. Maceri rejoined me and Ms. Waxman, Mr. Maceri told me that Ms.
15 MacLaren had yelled at him for not shaking her hand when he initially walked into the room and
16 he said to Mr. Parton that his client was "out of control."

17 7. Following the meeting, I received emails from Mr. Parton reiterating some of the
18 questions posed by Mr. Parris in the May 25, 2023 meeting, and I responded to his email on June
19 16, 2023, as shown in **Exhibit 1**.

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

22 Executed on this 25th day of July, 2023, at South Pasadena, California.

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25 Claire Collins
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STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

On July 25, 2023, I served true copies of the following document(s) described as **DECLARATION OF CLAIRE COLLINS IN SUPPORT OF MOTION BY THE PEOPLE CONCERN, INC. AS AGENT FOR SMALL PUMPER CLASS MEMBER BARREL SPRINGS PROPERTIES, LLC FOR ACTION AND IMPLEMENTATION OF WATERMASTER ENGINEER RECOMMENDATION OF APPROVAL OF BARREL SPRINGS PROPERTIES, LLC'S SEPTEMBER 30, 2022 NEW PRODUCTION APPLICATION** 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.

De Rosa

Linda M. DeRosa