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8 PROPERTIES, LLC

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

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

Judicial Council Coordination Proceeding No.
4408

12 **ANTELOPE VALLEY GROUNDWATER
13 CASES**

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

14 Including Consolidated Actions:

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

Assigned to the Hon. Jack Komar
Santa Clara Superior Court

16 Plaintiff,

17 v.

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

19 Defendants.

**DECLARATION OF JOHN MACERI IN
SUPPORT OF MOTION FOR ACTION
AND IMPLEMENTATION OF
WATERMASTER ENGINEER
RECOMMENDATION OF APPROVAL
OF BARREL SPRINGS PROPERTIES,
LLC'S SEPTEMBER 30, 2022 NEW
PRODUCTION APPLICATION**

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

23 Plaintiff,

24 v.

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

26 Defendants.

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

27 AND RELATED ACTIONS
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DECLARATION OF JOHN MACERI

I, John Maceri, declare as follows:

1. I am CEO of The People Concern, Inc., a California non-profit public benefit corporation. The People Concern, acting as agent for property owner Barrel Springs Properties, LLC, applied to the Antelope Valley Watermaster for approval of a new production well to be drilled on Barrel Springs Properties' land. The People Concern is presently and at all relevant times has been under contract with Barrel Springs Properties, LLC, to purchase the land at issue. The People Concern and Barrel Springs Properties are currently in escrow for this transaction. 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 attended an in-person meeting at AVEK, the Antelope Valley-East Kern Water Agency's offices, located in Palmdale, California.
3. The purpose of this meeting was for me and The People Concern's advisors, including counsel Claire Collins, and land use consultant Toby Waxman, to meet with Kathy MacLaren, the only member of the Antelope Valley Watermaster Board of Directors who voted "no" on Barrel Springs Properties' New Production Application at the Watermaster Board meeting held April 26, 2023.
4. My team asked to meet with Director MacLaren to understand and address her concerns, including the reason for her "no" vote.
5. Before the meeting, we learned that Robert Parris, who also serves on the Watermaster Board of Directors, wanted to attend because he had been unable to attend the April 26, 2023 Watermaster Board meeting.
6. After we arrived at AVEK's offices, we met with Robert Parris, Kathy MacLaren, Matt Knudson, and Craig Parton in a conference room.
7. Director MacLaren was seated at the head of the table when we came into the conference room; she did not rise to greet anyone. After initial pleasantries, which included my brief discussion with Director Parris about his interest in The People Concern's Kensington project in Palmdale, we sat down.

1 8. Director Parris sat to Director MacLaren's right, on the opposite side of the oval
2 conference room table. Mr. Parton sat to his right, directly opposite our counsel, Ms. Collins. I sat
3 to Ms. Collins's left. Ms. Waxman sat between Ms. Collins and Director MacLaren, at the head,
4 and Mr. Knudson sat to my left.

5 9. The meeting was not productive.

6 10. Director MacLaren refused to engage in conversation about her vote. I asked her
7 what her concerns were and the reasons for her "no" vote. She would not answer.

8 11. Ms. Collins asked her these same questions and was met with similar stonewalling.

9 12. I told her that it "was a little disheartening when I personally reached out to you
10 several times to answer your questions and got no response."

11 13. She stated that I was presuming she didn't know anything, that she knew a lot about
12 the property, that she had talked to real estate agents in the area, and that she didn't want to talk to
13 me. She also said that I "would just be putting my spin on it."

14 14. Every time Ms. Collins started to explain the reasons for the meeting, the basis for
15 our application for a new well, and the findings of the Watermaster Engineer, Director MacLaren
16 would cut her off, saying that she was not interested because "you're just going to put your spin on
17 it," or words to that effect. Director MacLaren's tone was belligerent throughout.

18 15. After it became clear that Director MacLaren had no interest in hearing from us and
19 no plans to explain her "no" vote, Ms. Collins told Mr. Parton that there was nothing further to
20 discuss, said "we're done here," and asked to see him outside the meeting.

21 16. We all stood up and Ms. Collins, Ms. Waxman, and Mr. Parton left the room.

22 17. Director Parris restarted our earlier conversation about the Kensington project and
23 asked about coming to see our operation. I stepped around the table to shake his hand and say
24 goodbye.

25 18. As I extended my hand to Director Parris, Director MacLaren began speaking in an
26 aggressive voice.

27 19. Director MacLaren said, "Well, I noticed when you walked into the meeting, you
28 didn't come over to shake my hand," Her tone was aggressive and unpleasant.

1 20. I turned to her and said, "I don't understand why you're making this so personal."

2 21. She then grabbed my hand and began pumping it aggressively, saying, "There, I
3 shook your hand. It's not personal," before throwing my hand down.

4 22. I was stunned by her lack of professionalism and said, "Wow, wow."

5 23. I then left the conference room, found Mr. Parton in the hall with Ms. Collins and
6 Waxman, and told him, "I wish you could have seen what just happened in there. You have a
7 client that's out of control."

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

10 Executed on this 24th day of July, 2023, at Los Angeles, California.

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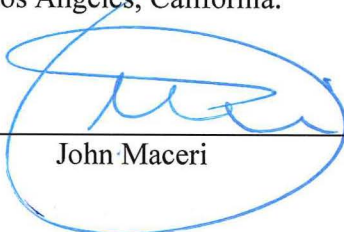
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John Maceri

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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 JOHN MACERI IN SUPPORT OF MOTION 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.

Executed on July 25, 2023, at Los Angeles, California.

Linda M. DeRosa