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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

**ANTELOPE VALLEY GROUNDWATER
CASES**

Included Actions:

Los Angeles County Waterworks District No.
40 v. Diamond Farming Co., Superior Court
of California, County of Los Angeles, Case
No. BC 325201;

Los Angeles County Waterworks District No.
40 v. Diamond Farming Co., Superior Court
of California, County of Kern, Case No. S-
1500-CV-254-348;

Wm. Bolthouse Farms, Inc. v. City of
Lancaster, Diamond Farming Co. v.
Lancaster, Diamond Farming Co. v. Palmdale
Water Dist., Superior Court of California,
County of Riverside, Case No. RIC 353 840,
RIC 344 436, RIC 344 668

Judicial Council Coordination No. 4408

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

**DECLARATION OF LEAH METZGER
IN LIEU OF DEPOSITION TESTIMONY
FOR PHASE 4 TRIAL**

DECLARATION

I, Leah Metzger, declare as follows:

1. I am the Director of Geographic Information Systems (GIS) for Tejon Ranchcorp ("Tejon"), and have been since July 1999. I am responsible for the design, development, organization, implementation, and management of all GIS data, including vector, raster and tabular databases, computer aided design (CAD) drawings, intranet mapping services, GPS collection, land records research, and cartographic map production for an area covering 270,000 acres located in Kern and Los Angeles Counties known generally as Tejon Ranch. I am also responsible for identifying, locating, mapping and managing the geographic databases used to track and inventory the real property owned by Tejon and Tejon Ranch Company. I have been working in GIS systems since 1993 and have completed numerous technical trainins courses reviewing GIS systems and methodology and have received nine (9) separate GIS training certificates. If called as a witness, I could and would competently testify to the facts contained herein.

Property Ownership and Parcel Size

2. I have been provided with a copy of the Court's Revised Order After Hearing on Jurisdictional Boundaries dated March 12, 2007 describing and depicting Antelope Valley Area of Adjudication (AVAA). Tejon owns approximately 34,227 acres of land within the AVAA; 9,178 acres of which are located within Los Angeles County and approximately 25,049 acres are located within Kern County. I prepared a table summarizing Tejon's ownership within the AVAA, including assessor number, record owner, calculated parcel size and land use which is attached as **Exhibit A** and incorporated herein by reference.

3. In conjunction with other lands, Tejon owns Rancho La Liebre, an 1846 Mexican land grant. Approximately 28,858 acres of Rancho La Liebre is within the AVAA. The legal description to Rancho La Liebre and the face page of the United States Surveyor's Plat are

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1 attached collectively hereto as **Exhibit B**. A true and correct copy of the La Liebre Patent is
2 attached as **Exhibit C**.

3 4. Tejon claims groundwater rights as to those properties it owns listed in Exhibit A.

4 5. Except as otherwise noted in Exhibit A, Tejon Ranchcorp, formerly known as
5 Tejon Ranch Co., was the record owner of all property listed in Exhibit A from 2000 through
6 present.

7
8 **Leases**

9 6. Assessor Parcel Nos. 225-110-16, 225-630-03, and 225-630-04 are leased to
10 National Cement Company, Inc. Assessor Parcel No. 255-050-04 is leased to B&B Materials,
11 Inc. To the best of my knowledge, none of the lessees claim groundwater rights as to the leased
12 parcels.

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

16 Executed this 8 day of February 2013, at Rebec, California

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18 
Leah Metzger

19 FM291.01 - tejon ranch - antelope valley\decl of leah metzger in lieu of depo testimony for phase 4 trial.doc
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