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March 28, 2013

OUR FILE NO.

1291.01

Via Posting on Court Web Site

R. Lee Leininger
United States Department of Justice
Environment and Natural Resources Division
1961 Stout Street, Suite 800
Denver, CO 80294

Re: Antelope Valley Groundwater Cases
Meet and Confer

Dear Mr. Leininger:

The purpose of this letter is to fulfill our obligation under the Civil Discovery Act to make a reasonable and good faith effort to resolve the United States' objections and failure to produce relevant documents at several depositions. Set forth below is a list of documents relevant to the United States' claims for pumping and Federal Reserve Right, which were identified, but not produced at the depositions of the United States' various witnesses. The documents are as follows:

- I. EAFB
 - A. Program Activity Directives (Judkins)
 - B. Water Meter Records (Judkins)
 - C. Bombing Range Map (Judkins)
 - D. Southern California Edison Pump Efficiency Tests (Judkins)
 - E. Progress Reports Re: AFERS Goals (Judkins)
 - F. Branch Pond Evaporation Calculations (Judkins)
 - G. EAFB Leases/Host Tenant Agreements (Brewer)
 - 1. Muroc School District
 - 2. NASA
 - 3. FAA
 - 4. Marine Corp.
 - 5. Commissaries
 - H. POM Financial Plans (Judkins, Brewer)
 - I. Spreadsheets showing water use by NASA, FAA, OPM, Muroc School. (Boetsch)

- II. PLANT 42
 - A. NASA MOU (Cummins)
 - B. Leases
 - 1. Lockheed
 - 2. Boeing
 - 3. Northrup Grumman
 - 4. City of Palmdale
 - C. AF Strategic Plan with Water Element (Scott)

You previously indicated your intent to review our request for these records with your clients. However, as of the date of this letter, we have not received any of the documents so requested. Please review the list and advise whether the United States intends to produce the documents listed.

Very truly yours,



Robert G. Kuhs

RGK/vjh