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Attorneys for Tejon Ranchcorp and Granite Construction Company

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

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

**SUPPLEMENTAL DECLARATION
OF ROBERT G. KUHS IN SUPPORT
OF MOTION TO APPROVE PHASE
6 DISCOVERY ORDER**

Date: January 27, 2014
Time: 9:00 a.m.
Dept.: Old D1, Room 222

I, ROBERT G. KUHS, declare as follows:

1. I am an attorney at law with Kuhs & Parker, counsel for Tejon Ranchcorp and Granite Construction Company in this proceeding. If called as a witness I could and would competently testify to the facts set forth herein.

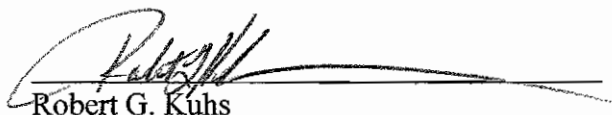
2. On January 14, 2014 I called Jeffrey Dunn, counsel for Los Angeles County

1 Waterworks District No. 40. During that telephone conference, Mr. Dunn provided me with
2 several comments regarding the Proposed Phase 6 Discovery Order, including a proposed
3 responsive date of April 4, 2014.

4 3. Also on January 14, 2014 at 4:00 p.m. I hosted a further conference call for the
5 purpose of meeting and conferring regarding the Proposed Phase 6 Discovery Order. The call
6 was attended by 16 attorneys representing a cross-section of the parties involved in this
7 coordinated proceeding.
8

9 4. Mr. Dunn's comments, as well as those received during the conference call, were
10 incorporated into the Proposed Phase 6 Discovery Order, as amended and attached hereto as
11 **Exhibit F.**

12 I declare under penalty of perjury under the laws of the State of California that the
13 foregoing is true and correct. Executed this 15th day of January, 2014, at Bakersfield, California.
14

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16 
Robert G. Kuhs