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Attorney for Quartz Hill Water District
Defendant/Cross Complainant

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE 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. BC325201;

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. City of Lancaster
Diamond Farming Co. v. Palmdale Water Dist.
Superior Court of California
County of Riverside, consolidated actions
Case Nos. RIC 353840, RIC 344436,
RIC 344668.

**Judicial Council Coordination Proceeding
No. 4408**

Santa Clara Case No. 1-05-CV-049053
Assigned to the Honorable Jack Komar Dept. I

Date: February 14, 2012
Time: 9:00 a.m.
Location: Room 1515
Judge Jack Komar

**REPLY TO SMALL PUMPER CLASS
STATEMENT REGARDING MOTION TO
COMPEL**

Quartz Hill Water District hereby replies to the Small Pumper Class statement regarding
the motion to compel on calendar for February 14, 2012:

1 The purpose of this motion to compel is to define the universe of claims to the groundwater
2 in this basin. This purpose has already been partially achieved. Many parties, in response to this
3 motion, have responded to discovery, or have responded through the mediation process. What we
4 have left are parties who have not requested an extension to respond to discovery, or responded to
5 the discovery.

6
7 It is important that this motion be granted so that all parties to this litigation know that if
8 they settle, the groundwater pumping number they have agreed upon will not be diluted by a late
9 claimant. If this case does not settle, this motion will assist all parties in planning the next trial.
10 Knowing the parties who could make a claim to the groundwater will allow the court, and all
11 parties, to appropriately schedule trial time and avoid preparation for unnecessary parties.

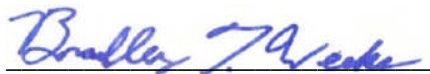
12
13 Quartz Hill Water District appreciates the sentiment expressed in the Wood Class
14 statement. When this case is concluded, and groundwater rights are allocated between the parties
15 to this litigation, all the participants will need to be careful to make sure that each water right is
16 accurately allocated to each party, and for the overlying owners, to each parcel or parcels.

17
18 This will be important for all parties, including the members of the Wood Class. Council
19 respectively suggests that this activity be performed at the conclusion of this case. Performing this
20 activity now, and only for the Wood Class, would take a great deal of resources, and would need to
21 be redone at the end of the case, to take into consideration the conditions at the time.

22
23 The motion to compel, and the proposed order, expressly excludes the members of the
24 Wood Class, they therefore will suffer no harm should the motion be granted.

25
26
27 Dated: February 10, 2012

CHARLTON WEEKS LLP



Bradley T. Weeks

Attorney for Quartz Hill Water District

PROOF OF SERVICE

I am employed in the aforesaid county, State of California; I am over eighteen years of age and not a party to the within action; my business address is 1031 West Avenue M-14, Suite A, Palmdale, California, 93551.

On February 10, 2012, at my place of business at Palmdale, California, a copy of the following DOCUMENT(s):

REPLY TO SMALL PUMPER CLASS STATEMENT REGARDING MOTION TO COMPEL

By posting the DOCUMENT listed above to the Santa Clara Superior Court website in regard to the Antelope Valley Groundwater Matter:

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

Executed on February 10, 2012

/s/P.J. Fenald