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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-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. 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

**FURTHER OPPOSITION REGARDING
PROTECTIVE ORDER BY ANTELOPE
VALLEY GROUNDWATER ASSOCIATION**

Date: November 9, 2012
Time: 9:00 a.m.
Department: 1

Quartz Hill Water District further opposes the motion for protective order by the Antelope
Valley Groundwater Association as follows:

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MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION

On October 12, 2012, this court granted the motion by the Antelope Valley Ground Water Association for a protective order through November 9, 2012. The motion was otherwise continued.

At the hearing of this motion, the court stated "the discovery that I see that has been propounded, is valid and accurate . . . the discovery seems to me to be legitimate and valid, and I haven't heard anybody say that it's not." The court concluded "if everything else fails, what will happen is Mr. Weeks's discovery can go forward."

No agreement has been reached regarding the disclosure of information, nor is settlement imminent. Other than the public water suppliers, no party has produced their evidence of land ownership and current and historical groundwater production. Other than the public water suppliers, no party has provided evidence of pumping, current pumping, type of pumping, or land use.

The time to get ready for trial is now. As this court also said at the October 12, 2012 hearing, "People can do whatever discovery they need to do to get ready for trial" The parties to this case need to know how much groundwater use the other parties are claiming, and the basis for those claims.

Perhaps there was a hope that the parties could have reached an agreement regarding the disclosure of information. No such agreement has been realized. At the hearing of this matter we will be 94 days from trial. As the court indicated on October 12, 2012, this discovery should go forward.

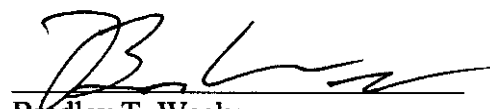
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2 **II. CONCLUSION**

3 Quartz Hill Water District respectfully requests the court take no further action on
4 AGWA's motion, and allow the protective order to lapse.
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6 Respectively submitted,
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8 CHARLTON WEEKS LLP

9 Dated: November 6, 2012

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11 Bradley T. Weeks
12 Attorney for Quartz Hill Water District
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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.

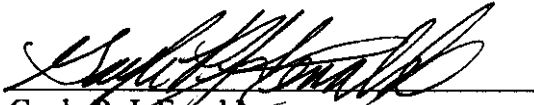
On November ⁸~~6~~, 2012, at my place of business at Palmdale, California, a copy of the following DOCUMENT(s):

FURTHER OPPOSITION TO MOTION FOR PROTECTIVE ORDER BY ANTELOPE VALLEY GROUNDWATER ASSOCIATION

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 November ⁸~~6~~, 2012


Gayle P. J. Fenald