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Exempt from filings fees under
Government Code Section 6103

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

**Judicial Council Coordination Proceeding
No. 4408**

Included Actions:

**OMNIBUS OBJECTION TO
DECLARATIONS**

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.

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Attorneys for City of Palmdale

1 The Public Water Suppliers listed above have reviewed the parties' declarations in lieu of
2 deposition testimony submitted pursuant to this court's amended Case Management Order dated
3 January 16, 2013. As a result, the number of depositions now scheduled is less than half the
4 number of depositions that were scheduled before the last Case Management Conference on
5 January 16, 2013. Scheduled depositions have been reduced from 135 to 66 with many of the
6 remaining depositions for parties' designated expert witnesses. Additionally, the depositions are
7 expected to be of shorter duration.

8 The Public Water Suppliers listed above anticipate they can stipulate to certain declarations
9 in lieu of testimony after analysis and discussion are completed. We respectfully suggest that the
10 Court consider extending the February 28, 2013 deadline to the next scheduled Case Management
11 Conference, March 25, 2013.

12 At this time, there are certain declarations for which there can be no stipulation because of
13 incomplete, inaccurate or otherwise disputed information.

14 Finally, some parties may claim that the filing of a declaration, even absent a stipulation,
15 will foreclose other parties' opportunity to take that party's deposition or that the declaration
16 constitutes facts established during trial. Therefore, in the interest of caution, the Public Water
17 Suppliers listed above hereby object to each and every declaration¹ filed as provided by the
18 amended Case Management Order dated January 16, 2013.

19
20 Respectively submitted

21 CHARLTON WEEKS LLP

22 Dated: February 28, 2013



23 Bradley T. Weeks
24 Attorney for Quartz Hill Water District
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28 ¹ Littlerock Creek Irrigation District, Palm Ranch Irrigation District, Desert Lake Community Services District, North
Edwards Water District, Big Rock Mutual Water Company, Llano del Rio Water Company, and Llano Mutual Water
Company do not object to each other's declarations.

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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 February 28, 2013, at my place of business at Palmdale, California, a copy of the following DOCUMENT(s):

OMNIBUS OBJECTION DECLARATIONS

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 28, 2103


Gayle P.J. Fenald