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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

QUARTZ HILL WATER DISTRICT
STATEMENT OF CLAIMS

Quartz Hill Water District provides the following statement of claims:

1	1.	Total amount of your groundwater production from 1946 to 2012, by year.
2	1946	480.00
3	1947	480.00
4	1948	729.00
5	1949	645.00
6	1950	480.00
7	1951	480.00
8	1952	43.00
9	1953	480.00
10	1954	28.00
11	1955	50.00
12	1956	147.00
13	1957	394.00
14	1958	447.00
15	1959	534.90
16	1960	525.80
17	1961	585.00
18	1962	624.00
19	1963	561.20
20	1964	545.00
21	1965	605.00
22	1966	603.00
23	1967	516.00
24	1968	621.00
25	1969	596.00
26	1970	917.00
27	1971	922.00
28	1972	1,065.00

1	1973	1,281.00
2	1974	1,166.00
3	1975	1,395.00
4	1976	1,474.00
5	1977	1,353.00
6	1978	915.00
7	1979	733.00
8	1980	752.00
9	1981	879.00
10	1982	658.00
11	1983	928.00
12	1984	1,147.00
13	1985	826.00
14	1986	1,332.00
15	1987	1,219.00
16	1988	1,709.00
17	1989	1,657.00
18	1990	1,198.90
19	1991	1,307.20
20	1992	1,375.90
21	1993	1,498.70
22	1994	1,262.00
23	1995	1,798.30
24	1996	2,336.76
25	1997	2,026.00
26	1998	1,231.00
27	1999	1,496.00
28	2000	1,413.00

1	2001	3,141.60
2	2002	2,801.00
3	2003	1,554.68
4	2004	1,347.64
5	2005	1,245.02
6	2006	1,405.55
7	2007	2,073.18
8	2008	2,853.98
9	2009	2,431.57
10	2010	1,907.05
11	2011	1,433.83
12	2012	1,524.85
13		
14	2. The amount of imported water you purchased, by year.	
15	1946	0.00
16	1947	0.00
17	1948	0.00
18	1949	0.00
19	1950	0.00
20	1951	0.00
21	1952	0.00
22	1953	0.00
23	1954	0.00
24	1955	0.00
25	1956	0.00
26	1957	0.00
27	1958	0.00
28	1959	0.00

1	1960	0.00
2	1961	0.00
3	1962	0.00
4	1963	0.00
5	1964	0.00
6	1965	0.00
7	1966	0.00
8	1967	0.00
9	1968	0.00
10	1969	0.00
11	1970	0.00
12	1971	0.00
13	1972	0.00
14	1973	0.00
15	1974	0.00
16	1975	0.00
17	1976	0.00
18	1977	0.00
19	1978	568.00
20	1979	872.00
21	1980	992.00
22	1981	1,154.00
23	1982	1,131.00
24	1983	930.00
25	1984	1,247.00
26	1985	1,601.00
27	1986	1,220.00
28	1987	1,407.00

1	1988	1,133.00
2	1989	1,369.00
3	1990	1,950.00
4	1991	1,543.00
5	1992	1,646.00
6	1993	1,833.00
7	1994	2,807.00
8	1995	2,098.00
9	1996	2,193.00
10	1997	2,859.00
11	1998	2,718.00
12	1999	3,211.00
13	2000	3,354.00
14	2001	1,909.00
15	2002	2,562.00
16	2003	3,706.49
17	2004	4,099.11
18	2005	4,154.20
19	2006	4,322.22
20	2007	4,539.37
21	2008	3,644.78
22	2009	3,146.28
23	2010	3,533.92
24	2011	3,883.37
25	2012	4,229.00
26	3. The amount of return flows generated from the imported water, by year.	
27	1946	0.00
28	1947	0.00

1	1948	0.00
2	1949	0.00
3	1950	0.00
4	1951	0.00
5	1952	0.00
6	1953	0.00
7	1954	0.00
8	1955	0.00
9	1956	0.00
10	1957	0.00
11	1958	0.00
12	1959	0.00
13	1960	0.00
14	1961	0.00
15	1962	0.00
16	1963	0.00
17	1964	0.00
18	1965	0.00
19	1966	0.00
20	1967	0.00
21	1968	0.00
22	1969	0.00
23	1970	0.00
24	1971	0.00
25	1972	0.00
26	1973	0.00
27	1974	0.00
28	1975	0.00

1	1976	0.00
2	1977	0.00
3	1978	0.00
4	1979	222.09
5	1980	340.95
6	1981	387.87
7	1982	451.21
8	1983	442.22
9	1984	363.63
10	1985	487.58
11	1986	625.99
12	1987	477.02
13	1988	550.14
14	1989	443.00
15	1990	535.28
16	1991	762.45
17	1992	603.31
18	1993	643.59
19	1994	716.70
20	1995	1,097.54
21	1996	820.32
22	1997	857.46
23	1998	1,117.87
24	1999	1,062.74
25	2000	1,255.50
26	2001	1,311.41
27	2002	746.42
28	2003	1,001.74

1	2004	1,449.24
2	2005	1,602.75
3	2006	1,624.29
4	2007	1,689.99
5	2008	1,774.89
6	2009	1,425.11
7	2010	1,230.20
8	2011	1,381.76
9	2012	1,518.40
10	4. The amount of your total groundwater production that is adverse, by year.	
11	1946	480.00
12	1947	480.00
13	1948	729.00
14	1949	645.00
15	1950	480.00
16	1951	480.00
17	1952	43.00
18	1953	480.00
19	1954	28.00
20	1955	50.00
21	1956	147.00
22	1957	394.00
23	1958	447.00
24	1959	534.90
25	1960	525.80
26	1961	585.00
27	1962	624.00
28	1963	561.20

1	1964	545.00
2	1965	605.00
3	1966	603.00
4	1967	516.00
5	1968	621.00
6	1969	596.00
7	1970	917.00
8	1971	922.00
9	1972	1,065.00
10	1973	1,281.00
11	1974	1,166.00
12	1975	1,395.00
13	1976	1,474.00
14	1977	1,353.00
15	1978	915.00
16	1979	733.00
17	1980	752.00
18	1981	879.00
19	1982	658.00
20	1983	928.00
21	1984	1,147.00
22	1985	826.00
23	1986	1,332.00
24	1987	1,219.00
25	1988	1,709.00
26	1989	1,657.00
27	1990	1,198.90
28	1991	1,307.20

1	1992	1,375.90
2	1993	1,498.70
3	1994	1,262.00
4	1995	1,798.30
5	1996	2,336.76
6	1997	2,026.00
7	1998	1,231.00
8	1999	1,496.00
9	2000	1,413.00
10	2001	3,141.60
11	2002	2,801.00
12	2003	1,554.68
13	2004	1,347.64
14	2005	1,245.02
15	2006	1,405.55
16	2007	2,073.18
17	2008	2,853.98
18	2009	2,431.57
19	2010	1,907.05
20	2011	1,433.83
21	2012	1,524.85

22 **5. The date when your prescriptive rights ceased to accrue.**

23 January 1, 2005.

24 **6. The prescriptive period.**

25 January 1, 1945 thru December 31, 2004

26 **7. The effect of the filing of Diamond Farming's and Bolthouse's original lawsuits on**
27 **your prescriptive rights.**

28

1 These original lawsuits stopped the running of the statute of limitations for Quartz Hill Water
2 District's prescriptive claims as to properties owned by the respective plaintiffs and described in
3 the complaints.

4 **8. The total amount of prescriptive rights you claim (without regard to self-help), and**
5 **the basis for calculation.**

6 1,413.00

7 **9. Against what parties you claim prescriptive rights.**

8 All private parties including Wood class, but not including Willis class, plus any party who
9 acquired their rights from a private party during the prescriptive period.

10 **10. Any non-prescriptive rights you claim.**

11 Domestic and municipal priorities, storage, in-lieu rights, etc.

12
13
14 Dated: August 28, 2013

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

QUARTZ HILL WATER DISTRICT STATEMENT OF CLAIMS

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 August 28, 2013

Gayle Fenald