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11 GOLDEN STATE WATER COMPANY

12 SUPERIOR COURT OF THE STATE OF CALIFORNIA
13 FOR THE COUNTY OF RIVERSIDE

14 Coordination Proceeding Special Title
15 (Cal. Rules of Court, rule 3.550)

16 MOJAVE BASIN AREA WATER CASES

17 ~~ICCP NO. 5265~~
18 Lead Case No. CIV208568

19 Assigned for All Purposes to the
20 Honorable Harold W. Hopp, Dept. 1

21 Honorable Craig G. Reimer, Judge
22 Presiding by assignment of the Chief
23 Justice

24 **GOLDEN STATE WATER
25 COMPANY'S OBJECTIONS TO:**

26 **(1) WATERMASTER'S AMENDED
27 OPPOSITION TO [GSWC'S]
28 MOTION TO ENFORCE
JUDGMENT; DECLARATION
OF ROBERT WAGNER;**

**(2) HESPERIA'S SUPPLEMENTAL
OPPOSITION;**

**(3) HESPERIA'S JOINDER IN
WATERMASTER'S
OBJECTIONS; AND**

**(4) DECLARATION OF PETER
LEFFLER DATED OCTOBER 9,
2024**

*[Filed concurrently with GSWC's Reply
to Amended and Supplemental
Oppositions to Motion to Enforce
Judgment; Declaration of Stephanie
Osler Hastings; Declaration of Anthony
Brown; Notice of Lodging]*

CITY OF BARSTOW, et al.,

Plaintiff,

v.

CITY OF ADELANTO, et al.,

Defendant.

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Date: October 22, 2024
Time: 1:30 p.m.
Dept.: M302 (Menifee Justice
Center)
Judge: Hon. Craig G. Reimer

Reservation ID: 562595011427

1 **I. INTRODUCTION**

2 Golden State Water Company (“**GSWC**”) hereby objects to the following amended or
3 supplemental opposition documents filed in connection with its Motion to Enforce Judgment
4 (“**Motion**”):

- 5 (1) Watermaster’s Amended Opposition to [GSWC’s Motion] (“**WM 2nd**
6 **Opposition**”); Declaration of Robert Wagner (“**10/9/24 Wagner Decl.**”);
7 (2) City of Hesperia’s Supplemental Opposition (“**Hesperia 2nd Opposition**”);
8 (3) Hesperia’s Joinder in Watermaster’s Objections to Newberry Springs Recreational
9 Lakes Association Response and Joinder in Watermaster’s Objections to
10 Declaration of Anthony Brown (“**Hesperia Joinder**”); and
11 (4) Declaration of Peter Leffler dated October 9, 2024 (“**10/9/24 Leffler Decl.**”)

12 GSWC’s general and specific objections are based on the grounds set forth in detail below. GSWC
13 respectfully requests that the Court strike the material objected to.

14 **II. GENERAL OBJECTIONS**

15 GSWC objects to Watermaster’s 2nd Opposition and attached Declaration of Robert C.
16 Wagner. Watermaster counsel agreed to the October 2, 2024 hearing date on GSWC’s Motion.
17 (09/05/24 Hastings Decl., ¶ 11.) Watermaster knew of GSWC’s specific objections to the 2024
18 PSY Update since at least February 28, 2024. (*Id.*, ¶ 7.) Unlike Hesperia, Watermaster’s initial
19 Opposition did not request a continuance. (See generally, Watermaster Opp.) Yet now
20 Watermaster introduces 12 new or revised documents totaling approximately 193 pages **for the**
21 **first time**. (10/16/24 Hastings Decl., ¶ 4.)

22 GSWC also objects to Hesperia’s 2nd Opposition. In its original Opposition, Hesperia
23 requested a continuance on the grounds it needed more time to respond to GSWC’s “technical
24 evidence.” The Court granted Hesperia’s request and further granted Hesperia the opportunity to
25 amend its opposition and produce new evidence. **It has produced none**. (Hastings Decl., ¶ 5, Ex.
26 1.) Hesperia’s 2nd Opposition has wasted the Court’s and the parties’ time and resources.

1 **III. SPECIFIC OBJECTIONS**

2 **A. Objection To Watermaster’s Amended Opposition to Golden State Water**
 3 **Company’s Motion to Enforce Judgment; Declaration of Robert C. Wagner**¹

4 **1. Objection To Watermaster 2nd Opposition**

No.	Objectionable Material	GSWC Objection	Ruling on GSWC Objection
1.	Watermaster 2 nd Opposition is 16 pages long.	The Watermaster 2 nd Opposition violates the California Rules of Court by exceeding the 15-page limit provided by rule 3.1113(d). Pursuant to rules 3.1113(g) and 3.1300(d), the Court has discretion to refuse to consider, wholly or in part, a brief that exceeds the allowable page limit. The Court should refuse to consider the 16 th page of the Watermaster 2 nd Opposition.	Sustained: _____ Overruled: _____
2.	“These hydrographs demonstrate quite clearly that groundwater levels in this desert environment, including the Centro and Baja subareas, are entirely driven by the presence or absence of significant storm events.” (WM 2 nd Opp., p. 4:1–4; see similar alleged facts at <i>id.</i> , pp. 3:20–22, 3:26–28, 4:17–22, 8:2–5.)	Speculative and lacks foundation. The hydrographs cited demonstrate only that groundwater levels for two monitoring wells <i>correlate</i> to storm events. No foundation is laid to demonstrate that storm events are the <i>sole</i> cause (“entirely driven”) by storm events, nor are other potential causes considered and ruled out based upon facts and expert analysis.	Sustained: _____ Overruled: _____
3.	“. . . installation of a stream gauge at or near the Helendale Fault would ‘be subject to the same conditions that resulted in [the Wild Crossing gage’s] abandonment, as noted by USGS, . . . Similarly, installing a stream gage at or near the Helendale Fault as suggested by GSWC would encounter the same conditions,	Speculative and lacks foundation. No facts or expert analysis are provided to support the bare conclusion that a stream gage at or near the Helendale Fault “would encounter the <i>same conditions</i> ” as the Wild Crossing gage.	Sustained: _____ Overruled: _____

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 27 ¹ “Watermaster’s Amended Opposition to Golden State Water Company’s Motion to Enforce
 28 Judgment; Declaration of Robert C. Wagner” was filed as a single document with the Declaration of Robert C. Wagner attached to Watermaster’s 2nd Opposition as Exhibit A. Attached to Exhibit A are 10 exhibits numbered Exhibit 1 – 10.

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	<p>resulting in an unreliable record’ (Wagner Declaration, Exhibit A hereto, p. 5).”</p> <p>(WM 2nd Opp., pp. 9:28–10:5.)</p>		
4.	<p>“Other possible reasons for decreased water levels in the GSWC well field (besides pumping and decreased flows because of severe drought) include flow-impeding faults, frequency and intensity of storms, groundwater flow patterns and transmissivity distribution (ability of the sediments to transmit water to the wells), flow migrating to the Harper Valley or Iron Mountain areas, and significant groundwater recharge between the HF and GSWC’s well field (i.e., the normally dry channel between the HF and Barstow induce more recharge in that area). (See Technical Memorandum, pp. 9–10, attached as Exhibit 1 to Wagner declaration, Exhibit A hereto.)”</p> <p>(WM 2nd Opp., p. 12:10–17.)</p>	<p>Speculative and lacks foundation. The statement speculates that other reasons could explain the decreased water levels observed by GSWC, but no facts or expert analysis are provided to demonstrate that any of the asserted “other reasons” actually <i>are causing</i> the decreased water levels.</p>	<p>Sustained:</p> <hr/> <p>Overruled:</p> <hr/>
5.	<p>“This is illustrated by the fact that 5 out of 17 wells are indicated to have statistically significant correlations/trends that show depth to water decreasing (water level rising) as pumping magnitude increases – which clearly demonstrates that the aquifer system underlying GSWC well fields has more complexity than GSWC’s simplified statistical analysis can capture. (See Technical Memorandum, p. 9, attached as Exhibit 1 to Wagner declaration, Exhibit A hereto.)”</p> <p>(WM 2nd Opp., p. 13:6–11.)</p>	<p>Speculative and lacks foundation. The statement speculates that because there is a trend of water level rising in 5 out of 17 wells, GSWC’s statistical analysis is flawed, but no facts or expert analysis are provided to connect the trend with a flaw in GSWC’s statistical analysis.</p>	<p>Sustained:</p> <hr/> <p>Overruled:</p> <hr/>
6.	<p>“Mr. Wagner’s Technical Memorandum (p. 9 of Exhibit 1 to Wagner Dec., Exhibit A hereto) also notes other factors that may affect</p>	<p>Speculative and lacks foundation. The statement speculates that “other factors” <i>may</i> affect water levels in GSWC’s well field, but no facts or</p>	<p>Sustained:</p> <hr/> <p>Overruled:</p> <hr/>

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	<p>the water levels in GSWC’s well field, including pumping by other wells in the area of influence of GSWC water level measurements; and pumping by nearby agricultural interests that purchased thousands of acre-feet of excess FPA from GSWC (see Exhibit 6 to Wagner declaration).”</p> <p>(WM 2nd Opp., p. 13:17–23.)</p>	<p>expert analysis are provided to demonstrate that any of the “other factors” actually <i>does</i> affect water levels in GSWC’s well field.</p>	
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2. Objection to 10/9/24 Wagner Decl.

No.	Objectionable Material	GSWC Objection	Ruling on GSWC Objection
1.	<p>The 10/9/24 Wagner Decl. (Exhibit A to the Watermaster 2nd Opp.) and exhibits to it are not consecutively paginated. (See 10/7/24 Order, at 7.)</p> <p>Further, Exhibits 6, 9 and 10 to the 10/9/24 Wagner Decl. are not paginated. (See 10/7/24 Order, at 7.)</p>	<p>The Court’s 10/7/24 Order provides: “The Court found it very cumbersome to search for documents referred in the points and authorities of Mr. Wagner’s declaration.... Accordingly, in any future motions to adjust FPA, every page of the declaration of Watermaster’s engineer and every page of any evidence authenticated by that declaration shall be sequentially numbered. All citations in either the memorandum of points and authorities or the engineer’s declaration to any of that evidence shall include the page number on which that evidence appears.” (10/16/24 Hastings Decl., ¶ 12, Ex. 6, 10/7/24 Order, at 7.)</p> <p><i>Even if</i> the 10/7/24 Order does not apply to motions unrelated to adjustment of the FPA, Watermaster’s practice of attaching multiple exhibits— numbering in the hundreds of pages and often without any pagination—to other exhibits which are attached to</p>	<p>Sustained:</p> <hr/> <p>Overruled:</p> <hr/>

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		Watermaster’s briefs, is cumbersome, at the very least, and violates the spirit and intent of the 10/7/24 Order.	
2.	At the hearing on October 2, 2024 Golden State Water Company (GSWC) stated that GSWC well fields have been experiencing water level declines during the recent five years. (10/9/24 Wagner Decl., p. 1:10-12.)	GSWC, the Party, did not present testimony at the hearing. Counsel for GSWC, Ms. Stephanie Hastings, did appear at the hearing on October 2, 2024, but did not make this statement (see 10/16/24 Hastings Decl. at 13.)	Sustained: <hr/> Overruled: <hr/>
3.	“The streamflow losses between Lower Narrows and Helendale Fault are due to consumptive uses as described later herein.” (10/9/24 Wagner Decl., p. 2:8–9; see similar alleged facts in Exhibit 1 [Technical Memorandum], pp. 9–10.)	Speculative and lacks foundation. No facts or expert analysis are provided to demonstrate that streamflow losses are caused by consumptive uses and not by other causes.	Sustained: <hr/> Overruled: <hr/>
4.	“The TM explains that the flow that enters Centro from the Transition Zone has been declining over the recent years due to the severe drought conditions experienced from 2012 to 2022. This is the reason that GSWC wells are experiencing chronic water level declines during that time.” (10/9/24 Wagner Decl., p. 2:10–12; see similar alleged facts at pp. 2:22–24, 3:7–8, 3:10–11; Exhibit 1 [Technical Memorandum], pp. 8–10.)	Speculative and lacks foundation. No facts or expert analysis are provided to demonstrate that severe drought conditions are a cause or the sole cause of declining flow entering Centro from the Transition Zone, as opposed to, or in addition to other causes.	Sustained: <hr/> Overruled: <hr/>
5.	“This exhibit [Exhibit 6] also includes two hydrographs corresponding to observed water levels at monitoring wells 09N02W06L11-14 and 09N03W23F01,03, and 04. These wells are representative of water level responses to pumping and recharge within this area.” (10/9/24 Wagner Decl., p. 3:3–5.)	Speculative and lacks foundation. No facts or expert analysis are provided to support the bare conclusion that the wells identified are “representative” of water level responses to pumping and recharge within the area generally.	Sustained: <hr/> Overruled: <hr/>
6.	“Having studied the data from the unreliable Wild Crossing gage and USGS conclusions as to its unreliability, it is my opinion that he [sic] installation of a stream gage at or	Speculative and lacks foundation. No facts or expert analysis are provided to support the bare conclusion that a stream gage at or near the Helendale Fault “would	Sustained: <hr/> Overruled: <hr/>

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	<p>near the Helendale Fault would be subject to the same conditions that resulted in the Wild Crossing gage’s abandonment, as noted by USGS; similarly, installing a stream gage at or near the Helendale Fault as suggested by GSWC would encounter the same conditions resulting in an unreliable record.”</p> <p>(10/9/24 Wagner Decl., p. 4:18–22.)</p>	<p>encounter the same conditions” as the Wild Crossing gage.</p>	
7.	<p>“GSWC’s Expert Report also indicates that Alto producers are not meeting their Subarea Obligation to deliver 23,000 acre-feet annually to the Transition Zone. . . . The subsurface flow component of this obligation (2,000 acre-feet annually) has been deemed by the Judgment and has been confirmed by later Watermaster studies: Report titled ‘Subsurface Flow Between Subareas’ dated February 22, 2006 (included as Exhibit 8).”</p> <p>(10/9/24 Wagner Decl., pp. 4:23–24, 4:27–5:2.)</p>	<p>Speculative and lacks foundation. No facts or expert analysis re provided to support the conclusion that Alto producers have met their delivery obligation post-2006. Additionally, a report dated in 2006 may not accurately account for current conditions.</p>	<p>Sustained: _____ Overruled: _____</p>

B. Objection To Hesperia 2nd Opposition

No.	Objectionable Material	GSWC Objection	Ruling on GSWC Objection
1.	<p>“The determination of safe/sustainable yield and associated potential for chronic groundwater elevation decline is ordinarily conducted over a multi-decade time period (and logically longer than 20 years for the type of analysis conducted by Mr. Brown) that is representative of longer-term climatic/hydrologic conditions. The selected time period for analysis should begin and end in below average water years to minimize water in transition and change in</p>	<p>Lacks foundation or authentication. Hesperia fails to request judicial notice of the extra-record document cited, or to supply a pincite to the specific portion of the document being referenced.</p>	<p>Sustained: _____ Overruled: _____</p>

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	<p>storage in the vadose zone. (California Department of Water Resources. California’s Groundwater; Working Toward Sustainability. Bulletin 118, Interim Update, available at https://data.cnra.ca.gov/dataset/calgw_update2020/resource/d2b45d3c-52c0-45ba-b92afb3c90c1d4be.)”</p> <p>(Hesperia 2nd Opp., p. 4:10-18.)</p>		
2.	<p>“The Brown Report time period begins in a wet year.”</p> <p>(Hesperia 2nd Opp., p. 4:18.)</p>	Assertion unsupported by evidence.	<p>Sustained:</p> <hr/> <p>Overruled:</p>
3.	<p>“Concentrated pumping can cause localized groundwater elevation declines and/or or a groundwater elevation depression that are not necessarily representative of the subbasin/subarea water balance as a whole.”</p> <p>(Hesperia 2nd Opp., p. 4:21-23.)</p>	Assertion unsupported by evidence.	<p>Sustained:</p> <hr/> <p>Overruled:</p>
4.	<p>“The Brown Declaration does not discuss Watermaster evidence showing stable groundwater levels in the Transition Zone and western portion of the Centro Subarea. (Wagner Declaration ISO Opposition to GSWC Motion Exhibit A, Alto Subarea Transition Zone Hydrographs 2024 and Exhibit B, Centro Subarea Hydrographs 2024, at pdf pp. 15-18.)”</p> <p>(Hesperia 2nd Opp., pp. 3:22-25, 4:24-27.)</p>	Expert Report of Anthony Brown acknowledges “not all Centro wells show declining water levels during their respective periods of record” in reaching the report’s conclusions. (GSWC 0025, see also GSWC 0346 [depicting Centro Subarea well hydrographs].)	<p>Sustained:</p> <hr/> <p>Overruled:</p>

C. Objection To Hesperia Joinder²

² GSWC takes no position on the Amended Response by Newberry Springs Recreational Lakes Association to Golden State Water Company’s Motion to Enforce Judgment; Declaration of Dr. W. Richard Laton, PG, CHG, Supporting the Report.

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No.	Objectable Material	GSWC Objection	Ruling on GSWC Objection
1.	Joinder filed 10/9/24.	Joinder is untimely. Any opposition to GSWC’s Motion was due 9/18/24. Even if a joinder was permissible up to the originally scheduled hearing date (10/2/24), that date has passed. The Joinder should be stricken.	Sustained: _____ Overruled: _____

D. Objection to 10/9/24 Leffler Decl.

No.	Objectable Material	GSWC Objection	Ruling on GSWC Objection
1.	“As described by the Watermaster, the Judgment does not create obligations to the Centro Subarea for the Alto Subarea, rather the Alto Subarea has obligations to the Transition Zone. (Watermaster Opposition to GSWC Motion to Enforce Judgment (Sept. 2024) (Watermaster Opposition).)” 10/9/24 Leffler Decl., ¶ 16.a.)	Speculative and lacks foundation. The statement improperly relies on the legal analysis of another party, without any of the declarant’s own legal analysis, which he is not qualified to perform because he is not an attorney.	Sustained: _____ Overruled: _____
2.	“Conversely, the Watermaster does present substantial evidence that the Alta Subarea is meeting its subarea obligation to the Transition Zone. (February 2024 PSY/FPA Tech Memo; Watermaster Motion to Adjust Free Production Allowance for Water Year 2024-2025; Watermaster Opposition.)” (10/9/24 Leffler Decl., ¶ 16.b.)	Fails to comply with Court’s 10/07/24 Order, ¶ 2.a., requiring presentation of “detailed” evidence and not mere conclusions or opinions. The conclusory claim that the entire February 2024 PSY/FPA Tech Memo is “substantial evidence” violates the standard set by the Court.	Sustained: _____ Overruled: _____
3.	“It is my opinion that it is not possible to draw any meaningful conclusions about Centro Subarea conditions using only observations of GSWC well elevations and pumping.” (10/9/24 Leffler Decl., ¶ 17.)	Speculative and lacks foundation. The declarant admits he did not examine or perform any analysis of GSWC well data, the conclusory statement that no meaningful conclusions can be drawn therefrom has no evidentiary	Sustained: _____ Overruled: _____

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		basis.	
4.	<p>“Further, given that Watermaster is scheduled to release—three months from now—an updated Upper Mojave River Basin Model that includes data and estimates for all Subareas, including the Transition Zone and Centro Subarea, the Brown Declaration and Report prematurely draw conclusions concerning the adequacy of the Watermaster’s model and the results thereof.”</p> <p>(10/9/24 Leffler Decl., ¶ 17.)</p>	<p>Speculative and lacks foundation. The statement relies solely on argument by another Party. The declarant does not establish that he has personal knowledge that the model will be updated, when, or what the update will contain.</p>	<p>Sustained:</p> <hr/> <p>Overruled:</p> <hr/>
5.	<p>“Concentrated pumping can cause localized groundwater elevation declines and/or groundwater elevation depressions, which may not be representative of the subbasin/subarea water balance as a whole. The occurrence of mutual well pumping interference and/or the presence of discharge boundaries (low permeability) within the radius of pumping influence may cause localized groundwater level declines.”</p> <p>(10/9/24 Leffler Decl., ¶ 10.)</p>	<p>Speculative and lacks foundation. No facts or expert analysis are provided to establish that concentrated pumping, mutual well pumping, or the presence of discharge boundaries have actually occurred, or that such occurrence has caused the groundwater level declines observed by GSWC.</p>	<p>Sustained:</p> <hr/> <p>Overruled:</p> <hr/>
6.	<p>“Moreover, the Brown Declaration and Report do not account for localized hydrogeologic conditions, such as faults and flow barriers, that may exacerbate well interferences and contribute to conditions not experienced elsewhere in the Centro Subarea.”</p> <p>(10/9/24 Leffler Decl., ¶ 13.c.)</p>	<p>Speculative and lacks foundation. No facts or expert analysis are provided to establish that localized hydrogeologic conditions, such as faults and flow barriers, actually occur in the relevant area, or that they have caused the groundwater level declines observed by GSWC.</p>	<p>Sustained:</p> <hr/> <p>Overruled:</p> <hr/>

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Dated: October 16, 2024

BROWNSTEIN HYATT FARBER
SCHRECK, LLP

By: 

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PROOF OF SERVICE

I am over the age of eighteen years and not a party to the within-entitled action. I am employed in Santa Barbara County, California. My business address is Brownstein Hyatt Farber Schreck, LLP, 1021 Anacapa Street, 2nd Floor, Santa Barbara, California 93101-2711. My electronic service address is Meldridge@bhfs.com. On October 16, 2024, I served a copy of the following document(s):

GOLDEN STATE WATER COMPANY’S OBJECTIONS TO:

- (1) WATERMASTER’S AMENDED OPPOSITION TO [GSWC’S] MOTION TO ENFORCE JUDGMENT; DECLARATION OF ROBERT WAGNER;**
- (2) HESPERIA’S SUPPLEMENTAL OPPOSITION;**
- (3) HESPERIA’S JOINDER IN WATERMASTER’S OBJECTIONS; AND**
- (4) DECLARATION OF PETER LEFFLER DATED OCTOBER 9, 2024**

BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) listed above to be sent to the persons at the e-mail addresses listed below and the parties listed on the attached service list

William J. Brunick, Esq.
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Mojave Basin Area Watermaster

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on October 16, 2024, at Santa Barbara, California.


Melissa Eldridge

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SERVICE LIST

<p>Pam K. Lee Plee@awattorneys.com Christine M. Carson ccarson@awattorneys.com Robert M. Hensley rhensley@awattorneys.com ALESIRE & WYNDER, LLP 3701 Wilshire Blvd., Suite 725 Los Angeles, CA 90010 Attorneys for City of Hesperia</p>	<p>Peter J. Kiel pkiel@cawaterlaw.com Vincent O. Goble vgoble@cawaterlaw.com LAW OFFICE OF PETER KIEL PC PO Box 422 Petaluma, California 94953 Attorneys for Defendant Victorville Water District, a Subsidiary District of the City Of Victorville (Formerly Victor Valley Water District and Baldy Mesa Water District)</p>
<p>Diana J. Carloni, Esq. LAW OFFICES - DIANA J. CARLONI 21001 N. Tatum Blvd., Suite 1630-455 Phoenix, AZ 85050 diana@carlonilaw.com Attorneys for Newberry Springs Recreational Lakes Association</p>	<p>Andre de Bortnowsky, Authority Attorney andre@gdblawoffices.com Joan Smyth, Deputy Authority Attorney joan@gdblawoffices.com GREEN DE BORTNOWSKY, LLP 30077 Agoura Court, Suite 210 Agoura Hills, California 91301 Attorneys for Defendant Victorville Water District, a Subsidiary District of the City Of Victorville (Formerly Victor Valley Water District and Baldy Mesa Water District)</p>
<p>Riverside County Superior Court Attn: MCC – Jennifer Castillo 4050 Main Street Riverside CA 92501 Jennifer.Castillo@riverside.courts.ca.gov</p>	<p>Courtroom Assistant – Department 07 Riverside Superior Court - Historic County of Riverside 4050 Main Street Riverside, CA 92501 Susan.Salazar@riverside.courts.ca.gov</p>

PROOF OF SERVICE

STATE OF CALIFORNIA }
COUNTY OF SAN BERNARDINO}

I am employed in the County of the San Bernardino, State of California. I am over the age of 18 and not a party to the within action; my business address is 13846 Conference Center Drive, Apple Valley, California 92307.

On October 17, 2024, the document(s) described below were served pursuant to the Mojave Basin Area Watermaster's Rules and Regulations paragraph 8.B.2 which provides for service by electronic mail upon election by the Party or paragraph 10.D, which provides that Watermaster shall mail a postcard describing each document being served, to each Party or its designee according to the official service list, a copy of which is attached hereto, and which shall be maintained by the Mojave Basin Area Watermaster pursuant to Paragraph 37 of the Judgment. Served documents will be posted to and maintained on the Mojave Water Agency's internet website for printing and/or download by Parties wishing to do so.

Document(s) filed with the court and served herein are described as follows:

GOLDEN STATE WATER COMPANY'S OBJECTIONS TO:

- (1) WATERMASTER'S AMENDED OPPOSITION TO [GSWC'S] MOTION TO ENFORCE JUDGMENT; DECLARATION OF ROBERT WAGNER;**
- (2) HESPERIA'S SUPPLEMENTAL OPPOSITION;**
- (3) HESPERIA'S JOINDER IN WATERMASTER'S OBJECTIONS; AND**
- (4) DECLARATION OF PETER LEFFLER DATED OCTOBER 9, 2024**

 X (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on October 17, 2024 at Apple Valley, California.



Jeffrey D. Ruesch

Mojave Basin Area Watermaster Service List as of October 17, 2024

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Mojave Basin Area Watermaster Service List as of October 17, 2024

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Hesperia, CA 92340-1472

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(mygoldenbiz9@gmail.com)
Jones Trust dated March 16, 2002 (via email)
35424 Old Woman Springs Road
Lucerne Valley, CA 92356-7237

Attn: Paul Jordan
Jordan Family Trust
1650 Silver Saddle Drive
Barstow, CA 92311-2057

Attn: Ray Gagné
Jubilee Mutual Water Company
P. O. Box 1016
Lucerne Valley, CA 92356

Attn: Lee Logsdon
Juniper Riviera County Water District
P. O. Box 618
Lucerne Valley, CA 92356-0618

Attn: Ash Karimi
Karimi, Hooshang
1254 Holmby Ave
Los Angeles, CA 90024-

Attn: Robert R. Kasner
(Robertkasner@aol.com)
Kasner Family Limited Partnership (via email)
11584 East End Avenue
Chino, CA 91710-

(Robertkasner@aol.com)
Kasner, Robert (via email)
11584 East End Avenue
Chino, CA 91710-1555

Attn: Martin A and Mercedes Katcher
Katcher, August M. and Marceline
12928 Hyperion Lane
Apple Valley, CA 92308-4565

Kemp, Robert and Rose
48441 National Trails Highway
Newberry Springs, CA 92365

Attn: Peggy Shaughnessy
Kemper Campbell Ranch
10 Kemper Campbell Ranch Road - Office
Victorville, CA 92395-3357

Kim, Jin S. and Hyun H.
419 Sara Jane Ln
Placentia, CA 92870-5137

Attn: Alan and Annette De Jong
Kim, Joon Ho and Mal Boon Revocable Trust
46561 Fairview Road
Newberry Springs, CA 92365-9230

(juskim67@yahoo.com)
Kim, Ju Sang (via email)
1225 Crestview Dr
Fullerton, CA 92833-2206

Kim, Seon Ja
34981 Piute Road
Newberry Springs, CA 92365-9548

Attn: Richard Koering
Koering, Richard and Koering, Donna
40909 Mountain View Road
Newberry Springs, CA 92365-9414

Attn: Catherine Cerri
(ccerri@lakearrowheadcsd.com)
Lake Arrowhead Community Services District
(via email)
P. O. Box 700
Lake Arrowhead, CA 92352-0700

Mojave Basin Area Watermaster Service List as of October 17, 2024

Attn: Claire Cabrey
(HandleWithClaire@aol.com;
mjaynes@mac.com)
Lake Jodie Property Owners Association (via
email)
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West Hollywood, CA 90069-4120

(PhillipLam99@Yahoo.com)
Lam, Phillip (via email)
864 Sapphire Court
Pomona, CA 91766-5171

Attn: Robert Lawrence Jr.
Lawrence, William W.
P. O. Box 98
Newberry Springs, CA 92365

Lee, Doo Hwan
P. O. Box 556
Lucerne Valley, CA 92356-0556

Attn: Virginia Janovsky
(virginiajanovsky@yahoo.com)
Lem, Hoy (via email)
17241 Bullock St.
Encino, CA 91316-1473

Attn: Billy Liang
Liang, Yuan - I and Tzu - Mei Chen
4192 Biscayne St
Chino, CA 91710-3196

Attn: Manshan Gan
Lo, et al.
5535 N Muscatel Ave
San Gabriel, CA 91776-1724

Attn: Dean Low (lowgo.dean@gmail.com)
Low, Dean (via email)
3 Panther Creek Ct.
Henderson, NV 89052-

Attn: Manoucher Sarbaz
Lucerne Valley Partners
9903 Santa Monica Blvd., PMB #541
Beverly Hills, CA 90212-1671

Attn: Nancy Lan
Lake Waikiki
230 Hillcrest Drive
La Puente, CA 91744-4816

(jlanglej@kurschgroup.com)
Langley, James (via email)
12277 Apple Valley Road, Ste. #120
Apple Valley, CA 92308-1701

Lawson, Ernest and Barbara
20277 Rock Springs Road
Apple Valley, CA 92308-8740

Attn: Sepoong & Woo Poong Lee
Lee, et al., Sepoong and Woo Poong
#6 Ensueno East
Irvine, CA 92620-

Lenhart, Ronald and Toni
4474 W. Cheyenne Drive
Eloy, AZ 85131-3410

Attn: Eric Larsen
(eric.larsen@libertyutilities.com;
tony.pena@libertyutilities.com)
Liberty Utilities (Apple Valley Ranchos
Water) Corp. (via email)
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Apple Valley, CA 92307

Attn: Neal Davies (ndavies@terra-gen.com;
dkelly@terra-gen.com)
Lockhart Land Holding, LLC (via email)
43880 Harper Lake Road
Hinkley, CA 92347-

Lua, Michael T. and Donna S.
18838 Aldridge Place
Rowland Heights, CA 91748-4890

Attn: Marian Walent
(LVVMC677@gmail.com)
Lucerne Vista Mutual Water Company (via
email)
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Lucerne Valley, CA 92356-0677

Attn: c/o J.C. UPMC, Inc. Lori Rodgers
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timrohmbuilding@gmail.com)
Lake Wainani Owners Association (via email)
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Tustin, CA 92780-7053

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Attn: Brad Francke
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2026 Turnball Canyon
Hacienda Heights, CA 91745-

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Attn: Gwen L. Bedics
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Attn: Eugene R. & Vickie R. Bird
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Mojave Basin Area Watermaster Service List as of October 17, 2024

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Attn: Robert Saidi
Mahjoubi, Afsar S.
46622 Fairview Road
Newberry Springs, CA 92365

Attn: Jimmy Berry
Manning, Sharon S.
19332 Balan Road
Rowland Heights, CA 91748-4017

Attn: Allen Marcroft
Marcroft, James A. and Joan
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Newberry Springs, CA 92365

Attn: James M. Hansen, Jr. (gm@mrcwd.org;
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Marshall, Charles
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Newberry Springs, CA 92365-9482

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San Juan Capistrano, CA 92675

Attn: Rod Sexton
McCollum, Charles L.
15074 Spruce St
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McKinney, Paula
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Attn: Olivia L. Mead
Mead Family Trust
31314 Clay River Road
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Attn: David I. Milbrat
Milbrat, Irving H.
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Attn: Donna Miller
Miller Living Trust
6124 Parsonage Circle
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Attn: Freddy Garmo (freddy@garmolaw.com)
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Attn: David Riddle
(driddle@mitsubishicement.com)
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Attn: Doug Kerns
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Attn: Dennis Hills
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Chino, CA 91710-3196

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Mojave Basin Area Watermaster Service List as of October 17, 2024

Attn: Jeff Gaastra (jeffgaastra@gmail.com)
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Association (via email)
32935 Dune Road, Space 10
Newberry Springs, CA 92365-

Attn: Mary Ann Norris
Norris Trust, Mary Ann
29611 Exeter Street
Lucerne Valley, CA 92356-8261

Attn: Kenton Eatherton
(keatherton@verizon.net)
NSSL, Inc. (via email)
9876 Moon River Circle
Fountain Valley, CA 92708-7312

Núñez, Luis Segundo
9154 Golden Seal Court
Hesperia, CA 92345-0197

Attn: Pearl or Gail Nunn
Nunn Family Trust
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Attn: Kody Tompkins
(ktompkins@barstowca.org)
Odessa Water District (via email)
220 E. Mountain View Street, Suite A
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Attn: Dorothy Ohai
Ohai, Reynolds and Dorothy
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Chino, CA 91710-5149

Attn: Craig Maetzold
(craig.maetzold@omya.com)
Omya California, Inc. (via email)
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Lucerne Valley, CA 92356-8646

Attn: John P. Oostdam
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24953 Three Springs Road
Hemet, CA 92545-2246

Attn: Nick Higgs
Oro Grande School District
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Oro Grande, CA 92368-0386

Attn: Taghi Shoraka
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Perko, Bert K.
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Yermo, CA 92398-0762

Pettigrew, Dan
285 N Old Hill Road
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Fontana, CA 92336-1156

Polich, Donna
75 3rd Avenue #4
Chula Vista, CA 91910-1714

Porter, Timothy M.
34673 Little Dirt Road
Newberry Springs, CA 92365-9646

Attn: Carin McKay
Precision Investments Services, LLC
791 Price Street, #160
Pismo Beach, CA 93449-2529

Price, Donald and Ruth
933 E. Virginia Way
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Pruett, Andrea
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Newberry Springs, CA 92365

(s_quakenbush@yahoo.com)
Quakenbush, Samuel R. (via email)
236 Iris Drive
Martinsburg, WV 25404-1338

Attn: Ron Herrmann
Quiros, Fransisco J. and Herrmann, Ronald
35969 Newberry Rd
Newberry Springs, CA 92365-9438

Attn: Elizabeth Murena
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Rancheritos Mutual Water Company (via
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P. O. Box 348
Apple Valley, CA 92307

Mojave Basin Area Watermaster Service List as of October 17, 2024

Attn: Michael A. Reed
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Attn: Brian C. Vail (bvail@river-west.com)
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2410 Fair Oaks Blvd., Suite 110
Sacramento, CA 95825-7666

(LucerneJujubeFarm@hotmail.com)
Rhee, Andrew N. (via email)
11717 Fairlane Rd, #989
Lucerne Valley, CA 92356-8829

Attn: Kelly Rice
Rice, Henry C. and Diana
31823 Fort Cady Rd.
Newberry Springs, CA 92365-

Attn: Ian Bryant
Rim Properties, LLC
15434 Sequoia Road
Hesperia, CA 92345-1667

Attn: Josie Rios
Rios, Mariano V.
P. O. Box 1864
Barstow, CA 92312-1864

Rivero, Fidel V.
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Corona, CA 92879-0825

(RayRizvi@Yahoo.com)
Rizvi, S.R Ali (via email)
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Attn: Jackie McEvoy (billt@rrmca.com)
Robertson's Ready Mix (via email)
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Corona, CA 92882-2212

Attn: Bill Taylor or Property Mngr
(billt@rrmca.com)
Robertson's Ready Mix (via email)
200 S. Main Street, Suite 200
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Attn: Jackie McEvoy (billt@rrmca.com)
Robertson's Ready Mix (via email)
PO Box 3600
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Attn: Susan Sommers (sommerssqz@aol.com)
Rossi Family Trust, James Lawrence Rossi
and Naomi (via email)
P. O. Box 120
Templeton, CA 93465-0120

Attn: Robert Vega
Royal Way
2632 Wilshire Blvd., #480
Santa Monica, CA 90403-4623

Attn: Sam Marich
Rue Ranch, Inc.
P. O. Box 133109
Big Bear Lake, CA 92315-8915

Attn: Dale W. Ruisch
Ruisch Trust, Dale W. and Nellie H.
10807 Green Valley Road
Apple Valley, CA 92308-3690

Attn: Sherwin Shoraka
S and B Brothers, LLC
1423 S. Beverly Glen Blvd., Ste. A
Los Angeles, CA 90024-6171

Attn: Jafar Rashid
(jr123realestate@gmail.com)
S and E 786 Enterprises, LLC (via email)
3300 S. La Cienega Blvd.
Los Angeles, CA 90016-3115

Attn: Sara Fortuna (sarajfortuna@gmail.com;
fourteengkids@aol.com)
Saba Family Trust dated July 24, 2018 (via
email)
212 Avenida Barcelona
San Clemente, CA 92672-5468

Attn: Kanoe Barker
(kanoebarker@yahoo.com)
Sagabean-Barker, Kanoeolokelani L. (via
email)
42224 Valley Center Rd
Newberry Springs, CA 92365

(BILLU711@Yahoo.com)
Samra, Jagtar S. (via email)
10415 Edgebrook Way
Northridge, CA 91326-3952

San Bernardino Co Barstow - Daggett Airport
268 W. Hospitality Lane, Suite 302
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Attn: Jared Beyeler
(waterquality@sdd.sbcounty.gov)
San Bernardino County - High Desert
Detention Center (via email)
222 W. Hospitality Lane, 2nd Floor - SDW
San Bernardino, CA 92415-0415

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San Bernardino County Service Area 29 (via
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222 W. Hospitality Lane, 2nd Floor (Spec
San Bernardino, CA 92415-0450

Attn: Jared Beyeler
(ssamaras@sdd.sbcounty.gov;
jbeyeler@sdd.sbcounty.gov;
waterquality@sdd.sbcounty.gov)
San Bernardino County Service Area 42 (via
email)
222 W. Hospitality Lane, 2nd Floor - SDW
San Bernardino, CA 92415-0450

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jbeyeler@sdd.sbcounty.gov;
waterquality@sdd.sbcounty.gov)
San Bernardino County Service Area 64 (via
email)
222 W. Hospitality Lane, 2nd Floor - SDW
San Bernardino, CA 92415-0450

Attn: Jared Beyeler
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jbeyeler@sdd.sbcounty.gov;
waterquality@sdd.sbcounty.gov)
San Bernardino County Service Area 70J (via
email)
222 W. Hospitality Lane, 2nd Floor - SDW
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Mojave Basin Area Watermaster Service List as of October 17, 2024

Attn: Rod Sexton
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Attn: Joseph Tapia
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Phelan, CA 92329-1820

Sheng, Jen
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Las Vegas, NV 89110-0100

(gloriasheppard14@gmail.com)
Sheppard, Thomas and Gloria (via email)
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Short, Jerome E.
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Attn: Carlos Banuelos
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Attn: Nepal Singh (NepalSingh@yahoo.com)
Singh, et al. (via email)
4972 Yearling Avenue
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Attn: Denise Smith
Smith, Denise dba Amerequine Beauty, Inc
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Newberry Springs, CA 92365-0188

Smith, Porter and Anita
8443 Torrell Way
San Diego, CA 92126-1254

Attn: Steve Kim (stevekim1026@gmail.com)
Snowball Development, Inc. (via email)
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Victorville, CA 92393-2926

Attn: Chan Kyun Son
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Sperry, Wesley
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Newberry Springs, CA 92365-0303

Spillman, James R. and Nancy J.
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Attn: Eric Miller (emiller@svla.com;
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SVL Box 7001
Victorville, CA 92395-5107

Attn: Joe Trombino
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Storm, Randall
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Synagro-WWT, Inc. (dba Nursury Products,
LLC) (via email)
P. O. Box 1439
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Attn: Russell Szykowski
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Mojave Basin Area Watermaster Service List as of October 17, 2024

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Attn: Daryl or Lucinda Lazenby
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Luceren Valley, CA 92356-

Attn: Stephen Thomas
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Woodland Hills, CA 91364-4229

Attn: Lynnette L. Thompson
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22815 Del Oro Road
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Attn: Rodger Thompson
Thompson Living Trust, R.L. and R.A.
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Apple Valley, CA 92308-8351

Thrasher, Gary
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Apple Valley, CA 92307-1105

Attn: Jim Hoover
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Attn: Mike Troeger (mjtroeger@yahoo.com)
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Turner, Terry
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Union Pacific Railroad Company (via email)
HC1 Box 33
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Van Leeuwen Trust, John A. and Ietie
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Attn: John Driscoll
Vernola Trust, Pat and Mary Ann
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Temecula, CA 92593-2190

Attn: John Nahlen
Victor Valley Community College District
18422 Bear Valley Road, Bldg 10
Victorville, CA 92395-5850

Attn: Jade Kiphen
Victor Valley Memorial Park
17150 C Street
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Attn: Arnold Villarreal
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