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Name(s) of Cross-Defendant(s) or Attorney

Mailing Address (Street or P.O. Box)

Mailing Address (City, State, Zip Code)

Phone Number

Email Address

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE, CIVIL COMPLEX CENTER

MOJAVE PISTACHIOS, LLC; et al.,

Plaintiffs,

v.

INDIAN WELLS VALLEY WATER
DISTRICT; et al.,

Defendants.

INDIAN WELLS VALLEY WATER
DISTRICT,

Cross-Complainant,

v.

ALL PERSONS WHO CLAIM A RIGHT
TO EXTRACT GROUNDWATER IN THE
INDIAN WELLS VALLEY
GROUNDWATER BASIN NO. 6-54
WHETHER BASED ON
APPROPRIATION, OVERLYING RIGHT,
OR OTHER BASIS OF RIGHT, AND/OR
WHO CLAIM A RIGHT TO USE OF
STORAGE SPACE IN THE BASIN; et al.,

Cross-Defendants.

Case No. 30-2021-01187275-CU-OR-CJC

*[Related to: Case No. 30-2021-01187589-CU-
WM-CXC; Case No. 30-2021-01188089-CU-
WM-CXC; Case No. 30-2022-01239479-CU-
MC-CJC; Case No. 30-2022-01239487-CU-
MC-CJC; Case No. 30-2022-01249146-CU-
MC-CJC]*

Assigned For All Purposes To:
The Honorable William Claster, Dept. CX104

**VERIFIED INITIAL DISCLOSURES
(Code of Civil Procedure section 842(a))**

Proposed Form for Voluntary Use

Complaint Filed: November 19, 2019
Phase 1 Trial Date: April 28, 2025

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SEARLES VALLEY MINERALS INC.,

Cross-Complainant,

v.

ALL PERSONS WHO CLAIM A RIGHT
TO EXTRACT GROUNDWATER IN THE
INDIAN WELLS VALLEY
GROUNDWATER BASIN NO. 6-54
WHETHER BASED ON
APPROPRIATION, OVERLYING RIGHT,
OR OTHER BASIS OF RIGHT, AND/OR
WHO CLAIM A RIGHT TO USE OF
STORAGE SPACE IN THE BASIN; et al.,

Cross-Defendants.

AND RELATED CASES.

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INITIAL DISCLOSURES

1. The name, address, telephone number, and email address of the party and, if applicable, the party’s attorney.

- (a) Name(s): _____
- (b) Address: _____

- (c) Telephone Number: _____
- (d) Email Address: _____
- (e) Attorney (if applicable): _____

2. The quantity of any groundwater pumped or extracted from the basin by the party and the method used to measure the amount of groundwater pumped or extracted for each of the previous 10 years preceding the filing of the cross-complaint (cross-complaint filed June 16, 2021).

Year	Amount of Groundwater Extracted	Method of Measurement
2020		
2019		
2018		
2017		
2016		

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Year	Amount of Groundwater Extracted	Method of Measurement
2015		
2014		
2013		
2012		
2011		

3. The type of water right or rights claimed by the party to pump groundwater (e.g., overlying right [i.e., you own property and pump water for use on that property], appropriative right, prescriptive right).

4. A general description of the purpose to which the groundwater has been put (i.e., how do you use the water?).

1 5. The location of each well or other source through which groundwater has been
2 pumped or extracted (e.g., Assessor Parcel Number or address).

3 _____
4 _____
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6 _____

7
8 6. The area in which the groundwater has been used (i.e., where are you using the
9 water you are pumping?).

10 _____
11 _____
12 _____
13 _____

14
15 7. Any claims for increased or future use of groundwater (i.e., do you anticipate
16 using more water in the future?).

17 _____
18 _____
19 _____
20 _____

21
22 8. The quantity of any beneficial use of any alternative water use that the party
23 claims as its use of groundwater under any applicable law, including, but not limited to, Section
24 1005.1, 1005.2, or 1005.4 of the Water Code.

25 _____
26 _____
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28 _____

1 9. Identification of all surface water rights and contracts that the party claims
2 provides the basis for its water right claims in the comprehensive adjudication.

3 _____
4 _____
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7
8 10. The quantity of any replenishment of water to the basin that augmented the
9 basin's native water supply, resulting from the intentional storage of imported or non-native
10 water in the basin, managed recharge of surface water, or return flows resulting from the use of
11 imported water or non-native water on lands overlying the basin by the party, or the party's
12 representative or agent, during each of the 10 calendar years immediately preceding the filing of
13 the cross-complaint (cross-complaint filed June 16, 2021).

14

Year	Quantity of Replenishment of Water to the Basin
2020	
2019	
2018	
2017	
2016	
2015	

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Year	Quantity of Replenishment of Water to the Basin
2014	
2013	
2012	
2011	

11. The names, addresses, telephone numbers, and email addresses of all persons possessing information that supports the party's disclosures.

(a) Name: _____

(b) Address: _____

(c) Telephone Number: _____

(d) Email Address: _____

(a) Name: _____

(b) Address: _____

(c) Telephone Number: _____

(d) Email Address: _____

(a) Name: _____

(b) Address: _____

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(c) Telephone Number: _____

(d) Email Address: _____

(a) Name: _____

(b) Address: _____

(c) Telephone Number: _____

(d) Email Address: _____

12. Any other facts that tend to prove the party's claimed water right.

Dated: _____, 2024

Signature of Cross-Defendant(s) or Attorney

Printed Name(s) of Cross-Defendant(s)

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VERIFICATION

I have read the foregoing **INITIAL DISCLOSURES** and know its contents.

Select applicable:

___ I am a party to this action. The matters stated in the foregoing are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters, I believe them to be true.

___ I am _____ (Title) of _____
(Names of Party/Parties), a party/parties to this action, I am authorized to make this verification for and on its/their behalf, and I make this verification for that reason. I am informed and believe and on that basis allege that the matters stated in the foregoing are true.

Executed at _____,
(City) (State)

on _____, 2024.

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

Signature(s) of Cross-Defendant(s) / Attorney

Printed Name(s) of Cross-Defendant(s)

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PROOF OF SERVICE

Mojave Pistachios, LLC; et al. v. Indian Wells Valley Water District; et al.

On _____, 2024, I served true copies of the following document(s) described as **VERIFIED INITIAL DISCLOSURES (Code of Civil Procedure section 842(a))** on the interested parties in this action as follows:

PLEASE SEE SERVICE LIST

BY MAIL: I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed above and deposited the envelope with the United States Postal Service in a sealed envelope with postage fully prepaid.

BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from my e-mail address to the persons at the e-mail addresses listed in the Service List.

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

Executed on _____, 2024, at _____,
(City)

(State)

(Signature)

(Printed Name)