QUARTZ HILL WATER DISTRICT ("Responding Party"), hereby responds as follows to
ANTELOPE VALLEY-EAST KERN WATER AGENCY ("Propounding Party") form interrogatories.

PRELIMINARY STATEMENT

It should be noted that Responding Party has not fully completed its investigation of the facts relating to this case, has not fully completed its discovery in this action and has not completed its preparation for trial. All the responses contained herein are based only upon such information and documents which are presently available to and specifically known by Responding Party and discloses only those contentions which are presently known to Responding Party. It is anticipated that further discovery, independent investigation, legal research and analysis will supply additional facts, and add meaning to the known facts, as well as establish entirely new factual conclusions and legal contentions, all of which may lead to substantial additions to, changes in, and variations from the responses herein set forth. The responses herein are given without prejudice to Responding Party's right to produce evidence of any subsequently discovered fact or facts which this Responding Party may later recall. Responding Party accordingly reserves the right to change any and all responses herein as additional facts are ascertained, analyses made, legal research is completed and contentions are made. Responding Party further reserves the right to offer, at time of trial, facts, testimony or other evidence discovered subsequent to and not included in this response, and assumes no obligation to voluntarily supplement or amend this response to reflect such facts, testimony or other evidence.

The responses contained herein are made in a good faith effort to supply as much factual information and as much specification of legal contentions as are presently known and available but should in no way lead to the prejudice of Responding Party in relation to further discovery, research, or analysis.

Responding Party does not concede the relevancy or materiality of any request, or of the subject to which such request refers.

Each response is made subject to all objections as to competence, relevance, materiality, propriety, admissibility, attorney-client privilege, attorney work product doctrine, and the
deliberative process privilege, as well as any or all other objections and grounds which would 
require exclusion of evidence. Responding Party reserves the right to make any and all such 
objections at trial and at any other proceeding relating to this action.

The specific responses and objections given below are submitted without prejudice to, and 
without waiving, any of these objections even though the general objections are not expressly set 
forth in each response.

As to each request Responding Party has conducted a good faint search of documents 
within its possession, custody, or control and were so indicated production is limited to found 
therein.

RESPONSES TO FORM INTERROGATORY

RESPONSE TO FORM INTERROGATORY NO. 17.1:

REQUEST FOR ADMISSION NO. 1:
YOU do not claim the right to recapture or use return flows resulting from State Water Project water 
imported by AVEK.

RESPONSE TO REQUEST FOR ADMISSION NO. 1:
Quartz Hill Water District, an importer of state water project water, denies that it does not have the 
right to recapture or use return flows resulting from State Water Project water it imports. Quartz Hill 
Water District admits it does not have the right to recapture or use return flows resulting from State 
Water Project water it does not import. All water purchased by Quartz Hill Water District from 
AVEK is water imported by Quartz Hill Water District. The facts and documents which support 
this response are the billing records, invoices, payments, and meter readings between AVEK 
between Quartz Hill Water District.

REQUEST FOR ADMISSION NO. 2:
YOU do not have any ownership interest in, or right to recapture or use, return flows resulting 
from State Water Project water imported by AVEK.
RESPONSE TO REQUEST FOR ADMISSION NO. 2:
Quartz Hill Water District, an importer of state water project water, denies that it does not have the right to recapture or use return flows resulting from State Water Project water it imports. Quartz Hill Water District admits it does not have the right to recapture or use return flows resulting from State Water Project water it does not import. All water purchased by Quartz Hill Water District from AVEK is water imported by Quartz Hill Water District. The facts and documents which support this response are the billing records, invoices, payments, and meter readings between AVEK and Quartz Hill Water District.

REQUEST FOR ADMISSION NO. 4:
YOU have not made any payments directly to the State of California or any of its subdivisions (other than AVEK) for the State Water Project water AVEK has imported and delivered to YOU.

RESPONSE TO REQUEST FOR ADMISSION NO. 4:
AVEK has not imported and delivered any water to Quartz Hill Water District. The water was imported by Quartz Hill Water District. Quartz Hill Water District had not directly paid to the State of California or any of its subdivisions (other than AVEK) for the water imported, but it, and its customers, has indirectly paid for this water by the payment of general fees and taxes.

REQUEST FOR ADMISSION NO. 7:
AVEK is both a wholesaler and retailer of State Water Project water - wholesaling water to the Public Water Suppliers, and retailing water to end users (including AVEK’s agricultural and other private customers).

RESPONSE TO REQUEST FOR ADMISSION NO. 7:
AVEK transfers water from the State Water Project to Quartz Hill Water District. AVEK also transfers water to agricultural interest directly.

REQUEST FOR ADMISSION NO. 8:
AVEK has not assigned or transferred to any other person its right to recapture or use the return flows resulting from the State Water Project water AVEK imports into the area of adjudication.

RESPONSE TO REQUEST FOR ADMISSION NO. 8:
Responding party denies that AVEK has the right to assign or transfer any right to return flows from water imported by Quartz Hill Water District. Responding party lack insufficient information regarding whether or not AVEK has ever attempted to assign or transfer Quartz Hill Water District return flow rights.

**REQUEST FOR ADMISSION NO. 9:**

AVEK has not abandoned or otherwise relinquished its claimed right to recapture and use return flows resulting from the State Water Project water AVEK imports into the area of adjudication.

**RESPONSE TO REQUEST FOR ADMISSION NO. 9:**

Responding party denies that AVEK has the right to abandon or relinquish any right to return flows from water imported by Quartz Hill Water District. Responding party lack insufficient information regarding whether or not AVEK has ever attempted to abandon or relinquish Quartz Hill Water District return flow rights.

CHRLTON WEEKS LLP

Dated: December 13, 2013

/s/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 December 13, 2013 at my place of business at 1031 West Avenue M-14, Suite A, Palmdale, California, a copy of the following document(s):

QUARTZ HILL WATER DISTRICT RESPONSE TO FORM INTERROGATORIES BY ANTELOPE VALLEY-EAST KERN WATER AGENCY

By posting the documents 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 December 13, 2013

/s/Gayle P. J. Fenald