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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

9 **FOR THE COUNTY OF SAN BERNARDINO – RANCHO CUCAMONGA DISTRICT**

10
11 CHINO BASIN MUNICIPAL WATER
12 DISTRICT,

13 Plaintiff,

14 v.

15 CITY OF CHINO, et al.,

16 Defendants.

) CASE NUMBER: RCV 51010
[Assigned for All Purposes to the Honorable
Stanford E. Reichert]

) **CITY OF CHINO'S REPLY TO
OVERLYING (AGRICULTURAL)
POOL'S OPPOSITION TO CITY OF
CHINO'S MOTION TO PERMIT CHINO
TO CONDUCT DISCOVERY**

) Date: February 26, 2016
Time: 1:30 p.m.
Dept.: R6

) (FEE- EXEMPT PURSUANT TO GOVERNMENT
CODE § 6103)

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25 The City of Chino (hereafter "Chino") submits this brief in reply to the Overlying
26 Agricultural Pool's Opposition (hereafter "AP Opposition") to City of Chino's Motion to
27 Permit Chino to Conduct Discovery (hereafter "Discovery Motion").

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I.

INTRODUCTION

The motion filed by Watermaster has presented this Court with an equitable issue to adjudicate, which is the approval and enforcement of the 2015 Safe Yield Reset Agreement (SYRA) that would change the status quo among the Parties to the Judgment herein. The SYRA would deprive Chino and the Jurupa Community Services District (JCSD) of their water rights under the Judgment for the benefit of the Opposing Parties. That is sufficient basis for this Court to allow Chino to conduct discovery.

The Overlying Agricultural Pool (“AP”) argues that it is immune from discovery because the Motion seeking approval of the SYRA has been filed by Watermaster and that all relevant evidence is contained in that Motion. However, the AP is a beneficiary and listed as a Party to the SYRA. Furthermore, the AP has not disclaimed its interest in the benefits under the SYRA.

The AP Opposition misinterprets the Discovery Motion.

The AP Opposition avoids the reasons that Chino seeks to conduct discovery. Chino’s reasons are clear. Chino seeks to conduct discovery in order to establish Chino’s rights to the waters of the Chino Basin under the Judgment by showing what its rights have been, to show how the Parties and Watermaster have interpreted and applied the Judgment as to Chino’s rights, to ascertain whether any Party disputes Chino’s rights under the judgment, to demonstrate that Chino’s rights would be taken by the SYRA and to ascertain what basis may exist for taking Chino’s rights.

The AP Opposition objects to Chino’s request to conduct discovery on technical grounds – that CCP 2024.050 contains conditions that must be satisfied before granting a request to conduct discovery and that those conditions are absent here.

The bigger picture is that Due Process entitles Chino to conduct discovery in order to challenge the evidence offered against it by Watermaster and the Parties to the Judgment that would benefit from the approval of the SYRA.

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1 II.

2 DISCUSSION

3 1. The AP Opposition Misinterprets Section 2024.050(a) of the Code of Civil
4 Procedure

5 The AP objects under 2024.050(a), because no new trial has been set. Therefore, there
6 is no need to prepare for it and Chino has not been surprised because it has participated in the
7 various meetings on the subject. In addition, Chino's meet and confer letters are deceptive.

8 A new trial may not have been set in the technical sense; but Watermaster's Motion
9 has initiated a contest over Chino's right to continue to use the waters of the Chino Basin
10 under the Judgment. The essence of the Safe Yield Reset Agreement (SYRA), for which
11 Watermaster seeks court approval, would deprive Chino of its adjudicated rights to the waters
12 of the Chino Basin. In this sense, there is a very real "new trial" or a "re-trial" of Chino's
13 rights to the waters of the Chino Basin. As for the meet and confer requirement, Chino has
14 met it. The opposing declarations acknowledge that Chino requested to conduct discovery
15 and that the AP refused to comply on the basis that a motion is required. Therefore, the
16 motion was made.

17 The AP Opposition argues that Chino did not meet and confer in good faith. However,
18 it acknowledges that Ms. Tracy Egoscue and Ms. Carol A.Z. Boyd received Chino's meet and
19 confer letters. In addition, the declaration of Arturo N. Fierro contains "*facts showing a*
20 *reasonable and good faith attempt at an informal resolution of each issue presented by the*
21 *motion.*" His letters to Ms. Tracy Egoscue and Ms. Carol A.Z. Boyd states that they are
22 "meet and confer" letters and they explain his belief that discovery is appropriate in that their
23 clients seek post judgment orders to change the status quo, through the approval of the Safe
24 Yield Reset Agreement, and that Section 2024.050 of the Code of Civil Procedure cannot be
25 interpreted so narrowly as to deny discovery in this a substantial post-judgment dispute. Ms.
26 Tracy Egoscue and Ms. Carol A.Z. Boyd sent letters to Mr. Fierro, which rejected his request
27 and stated the basis of their opinions. The fact that the Parties disagreed is not proof of a lack
28 of good faith.

1 2. **The AP Opposition Misinterprets Section 2024.050(b) of the Code of Civil**
2 **Procedure**

3 The AP objects under 2024.050(b); but its objection misinterprets this subsection as
4 containing criteria that must be met before a court may grant a request to conduct discovery.
5 This interpretation is incorrect. This subsection grants wide discretion to a court to grant or
6 deny a request to conduct discovery. In recognition of that discretion, this subsection requires
7 the court to consider all relevant matters including the four enumerated ones. The four
8 enumerated matters are not a set of conditions that must be met before the court may grant a
9 request to conduct discovery. They do not condition the court's discretion. They are a part of
10 the court's broad discretion to grant or deny a request to conduct discovery.

11 On the first enumerated matter about the "necessity and reasons for the discovery"
12 Chino has explained why it seeks discovery. (Motion, 5:14-6:25; Gutierrez decl. in support of
13 motion, paras. 13-15.) The AP Opposition does not address those reasons nor denies that it
14 does not have information that related to those issues. Instead, it criticizes the written
15 discovery Chino sent to the parties as being proof that discovery is unnecessary, because one
16 request for admissions asked the parties to authenticate Watermaster's Assessment Package
17 and that the document is in the "public domain." It would be true that this particular
18 discovery request is not necessary if the Parties had admitted to its authenticity or if the AP
19 Opposition had admitted to it. Since they have not, the question remains about whether the
20 Parties acknowledge that the Assessment Package defines Chino's rights to the waters of the
21 Chino Basin under the Judgment. This point of opposition supports Chino's need and reason
22 to conduct discovery.

23 On the second enumerated matter about the "diligence or lack of diligence of the party
24 seeking discovery," Chino has demonstrated diligence by seeking formal discovery from the
25 Parties prior to the filing of Watermaster's Motion. In addition, the Court was aware that
26 Chino was about to file an Ex Parte Motion to Hear its Discovery Motion. Nevertheless, the
27 AP argues that Chino has not been diligent, because Chino has had adequate time and access
28 to Watermaster's documents to prepare its defense. This argument, however, is inapposite for

1 two reasons. First, having access to documents is unrelated to a lack of diligence in seeking
2 an order to conduct discovery. Second, the AP assumes to know what documents exist, their
3 relevance to Chino's position, their admissibility and whether they are subject to the privilege
4 under the Facilitation and Non-Disclosure Agreement (FANDA).

5 Next, the AP accuses Chino's counsel of having "*made a strategic decision to attempt*
6 *to discover and present evidence of specious and speculative claims after final negotiations*
7 *have been completed.*" This argument is unrelated to any lack of diligence as it speculates
8 about the quality of evidence that Chino may offer. The argument assumes to know what
9 evidence Chino would present and further assumes that such evidence would be "*specious*
10 *and speculative*" which is a rather pejorative opinion. Further, it implies that Chino should be
11 satisfied with "negotiations" by others Parties, which culminated in an agreement to their
12 liking to take Chino's water rights, and that Chino has no right to oppose their agreement by
13 seeking to obtain and offer evidence in opposition. Finally, it relies on *Cottini v. Enloe*
14 *Medical Center* (2014) 226 C.A.4th 401 to compare Chino to the plaintiff in that case; but it is
15 inapposite. That case involved a plaintiff in a negligence action who failed to disclose his
16 expert witnesses when required and who noticed depositions that he did not take. Instead, he
17 made a motion to disqualify opposing counsel rather than disclose his expert witnesses.
18 Thereafter, he sought to reopen discovery but his request was denied. In *Cottini*, the plaintiff
19 had an opportunity to conduct discovery on his lawsuit. Here, Chino has had no opportunity
20 to conduct discovery on the Motion brought by Watermaster; and the parties have refused to
21 allow discovery without first obtaining a court order.

22 In addition, the AP argues that discovery is not necessary because Chino has all of the
23 documents and information on the Safe Yield reset and implies that such information meets
24 Chino's needs. (AP Opposition, 6:15-28) The AP does not explain what information Chino
25 has and how that information is related to the issues Chino has outlined in its Motion.
26 Instead, the AP has made a series of assumptions. One is that "all non-confidential materials
27 generated during the mediation process have been submitted to the Court." (AP Opposition,
28 6:21-22.)

1 The AP also claims that allowing discovery will delay the hearing on Watermaster's
2 Motion seeking approval of the SYRA. However, Watermaster did not file its motion until
3 October 23, 2015 and it is set for hearing on February 26, 2016.

4 What the AP argues is expediency over fairness. As discussed in Chino's Reply to
5 Watermaster's Opposition, due process demands discovery here. That argument is not
6 repeated here in the interest of brevity.

7 **III.**

8 **CONCLUSION**

9 Watermaster seeks to take away Chino's water rights for the benefit of the Parties to
10 the Judgment including the AP. Fairness entitles Chino to challenge the evidence in support
11 of the SYRA. The only way to allow Chino to do so is to permit it to pursue the discovery on
12 the issues outlined in its motion.

13 Chino respectfully asks the Court to permit that discovery.

14
15 Dated: February 1, 2016

GUTIERREZ, FIERRO & ERICKSON, APC

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17 By:

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CHINO BASIN WATERMASTER
Case No. RCV 51010
Chino Basin Municipal Water District v. The City of Chino

PROOF OF SERVICE

I declare that:

I am employed in the County of San Bernardino, California. I am over the age of 18 years and not a party to the within action. My business address is Chino Basin Watermaster, 9641 San Bernardino Road, Rancho Cucamonga, California 91730; telephone (909) 484-3888.

On February 1, 2016 I served the following:

1. CITY OF CHINO'S REPLY TO OVERLYING (AGRICULTURAL) POOL'S OPPOSITION TO CITY OF CHINO'S MOTION TO PERMIT CHINO TO CONDUCT DISCOVERY

/ X / BY MAIL: in said cause, by placing a true copy thereof enclosed with postage thereon fully prepaid, for delivery by United States Postal Service mail at Rancho Cucamonga, California, addresses as follows:

See attached service list: Mailing List 1

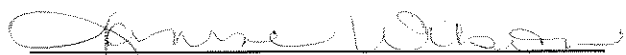
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I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on February 1, 2016 in Rancho Cucamonga, California.



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