

**FEE EXEMPT**

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**CHINO BASIN WATERMASTER**

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SAN BERNARDINO

CHINO BASIN MUNICIPAL WATER  
DISTRICT,

Plaintiff,

v.

CITY OF CHINO, et al.,

Defendant.

**Case No. RCV 51010**

[Assigned for All Purposes to the Honorable  
STANFORD E. REICHERT]

**WATERMASTER'S RESPONSE TO CITY  
OF CHINO'S OBJECTIONS TO  
DECLARATION OF PETER KAVOUNAS  
SUBMITTED IS SUPPORT OF  
WATERMASTER'S MOTION  
REGARDING 2015 SAFE YIELD RESET  
AGREEMENT, AMENDMENT OF  
RESTATED JUDGMENT, PARAGRAPH 6**

Date: February 26, 2016  
Time: 1:30 P.M.  
Dept.: R-6

[Filed concurrently with Watermaster's Reply  
to Oppositions to Motion Regarding 2015 Safe  
Yield Reset Agreement; Watermaster's  
Response to Objections to Decl. of Wildermuth;  
Supplemental Decl. of Wildermuth;  
Supplemental Decl. of Kavounas; Supplemental  
Decl. of Maurizio]

The CHINO BASIN WATERMASTER ("Watermaster") hereby submits its Response to  
the City of Chino's ("Chino") Objections to Declaration of Peter Kavounas Submitted with  
Watermaster's Motion Regarding 2015 Safe Yield Reset Agreement, Amendment of Restated

Judgment, Paragraph 6.

<b>MATERIALS OBJECTED TO:</b>  <b>Declaration of Peter Kavounas</b>	<b>GROUND FOR OBJECTION:</b>
<p>1. "To date, Watermaster has paid WEI approximately \$1,125,000 for the work undertaken in the creation of the Updated Basin Model and the Updated Basin Model's calculation of the Basin yield during this Safe Yield recalculation and reset process." (Para. 3, lines 5-7.)</p>	<p>Lacks foundation. (Evid. C. §702)</p> <p>Irrelevant and immaterial. (Evid. C. §350)</p> <p><b>WATERMASTER'S RESPONSE:</b></p> <p>Evidence Code Section 210 defines relevant evidence as evidence, including evidence relevant to the credibility of a witness or hearsay declarant, having any tendency in reason to prove or disprove any disputed fact that is of consequence to the determination of the action. This statement provides background information on the work performed by WEI, which helps to form the basis of the Watermaster's motion. Evidence Code Section 403(a)(2) sets forth that foundation is sufficient where the "preliminary fact is within the personal knowledge of a witness concerning the subject matter of his testimony." As the declarant is the General Manager for the Watermaster and declares that he has knowledge of the actions taken, he has the appropriate foundation for this statement.</p>

<b>MATERIALS OBJECTED TO:</b>  <b>Declaration of Peter Kavounas</b>	<b>GROUND'S FOR OBJECTION:</b>
2. "At the request of the members of the Appropriative Pool, Watermaster facilitated discussion sessions among the Parties." (Para. 5, lines 14-15.)	Lacks foundation. (Evid. C. §702)  Irrelevant and immaterial. (Evid. C. §350)  <b>WATERMASTER'S RESPONSE:</b>  Evidence Code Section 210 defines relevant evidence as evidence, including evidence relevant to the credibility of a witness or hearsay declarant, having any tendency in reason to prove or disprove any disputed fact that is of consequence to the determination of the action. This statement provides background as to the actions taken by the Watermaster and at whose request. Evidence Code Section 403(a)(2) sets forth that foundation is sufficient where the "preliminary fact is within the personal knowledge of a witness concerning the subject matter of his testimony." As the declarant is the General Manager for the Watermaster and declares that he has knowledge of the actions taken, he has the appropriate foundation for this statement.
3. "Watermaster staff and consultants additionally conducted numerous meetings with smaller subsets of interested Parties." (Para. 5, lines 15-16.)	Lacks foundation. (Evid. C. §702)  Irrelevant and immaterial. (Evid. C. §350)  <b>WATERMASTER'S RESPONSE:</b>  Evidence Code Section 210 defines relevant evidence as evidence, including evidence

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<b>MATERIALS OBJECTED TO:</b>  <b>Declaration of Peter Kavounas</b>	<b>GROUND FOR OBJECTION:</b>
	<p>relevant to the credibility of a witness or hearsay declarant, having any tendency in reason to prove or disprove any disputed fact that is of consequence to the determination of the action. This statement provides background as to the actions taken by the Watermaster and at whose request. Evidence Code Section 403(a)(2) sets forth that foundation is sufficient where the "preliminary fact is within the personal knowledge of a witness concerning the subject matter of his testimony." As the declarant is the General Manager for the Watermaster and declares that he has knowledge of the actions taken, he has the appropriate foundation for this statement.</p>
<p>4. "WEI has indicated to Watermaster and the Parties that its Updated Basin Model can competently, reasonably, and accurately perform the required basin yield recalculation arising from the OBMP Implementation Plan and prior orders of this Court." (Para. 7, lines 17-19.)</p>	<p>Irrelevant and immaterial. (Evid. C. §350) Lacks foundation. (Evid. C. §702) Hearsay. (Evid. C. §1200) Improper lay opinion; opinion based on improper matter. (Evid. C. §§800, 803) Oral testimony inadmissible to prove the contents of a writing. (Evid. C. §1523)</p> <p><b>WATERMASTER'S RESPONSE:</b></p> <p>Evidence Code Section 210 defines relevant evidence as evidence, including evidence</p>

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MATERIALS OBJECTED TO:	GROUNDS FOR OBJECTION:
<b>Declaration of Peter Kavounas</b>	
	relevant to the credibility of a witness or hearsay declarant, having any tendency in reason to prove or disprove any disputed fact that is of consequence to the determination of the action. This statement is relevant as it goes to the Watermaster's decision to rely upon the model prepared by WEI. Evidence Code Section 403(a)(2) sets forth that foundation is sufficient where the "preliminary fact is within the personal knowledge of a witness concerning the subject matter of his testimony." As the declarant is the General Manager for Watermaster, declared that he attended all of the meetings, and is including this statement in his declaration, he has the appropriate foundation for this statement. There is no out of court statement being offered for the truth of the matter asserted in this statement so there is no validity to the hearsay objection. Finally, there is no testimony in this statement being offered to prove the content of the writing.
5. "There is no evidence of any kind that has been presented to Watermaster that suggests that the Updated Basin Model developed by Mr. Wildermuth under the	Irrelevant and immaterial. (Evid. C. §350) Lacks foundation. (Evid. C. §702) Improper lay opinion; opinion based on improper matter. (Evid. C. §§800, 803)

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<b>MATERIALS OBJECTED TO:</b>	<b>GROUND FOR OBJECTION:</b>
<b>Declaration of Peter Kavounas</b>	
direction of Watermaster is insufficient to perform the evaluation described in the Reset Technical Memorandum." (Para. 7, lines 17-22.)	Oral testimony inadmissible to prove the contents of a writing. (Evid. C. §1523) <b>WATERMASTER'S RESPONSE:</b> Evidence Code Section 210 defines relevant evidence as evidence, including evidence relevant to the credibility of a witness or hearsay declarant, having any tendency in reason to prove or disprove any disputed fact that is of consequence to the determination of the action. This statement is relevant as it goes to the Watermaster's decision to rely upon the model prepared by WEI. Evidence Code Section 403(a)(2) sets forth that foundation is sufficient where the "preliminary fact is within the personal knowledge of a witness concerning the subject matter of his testimony." As the declarant is the General Manager for Watermaster, declared that he attended all of the meetings, and is including this statement in his declaration, he has the appropriate foundation for this statement. There is no out of court statement being offered for the truth of the matter asserted in this statement so there is no validity to the hearsay objection. Finally, there is no testimony in this statement being

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<b>MATERIALS OBJECTED TO:</b>  <b>Declaration of Peter Kavounas</b>	<b>GROUND FOR OBJECTION:</b>
	offered to prove the content of the writing.
6. "Experts hired by the Parties to review the Updated Basin Model have indicated that it is a reliable tool for simulating the movement of water within the Basin, and to my knowledge, no party contests that this is the case." (Para. 7, lines 22-24.)	Irrelevant and immaterial. (Evid. C. §350) Lacks foundation. (Evid. C. §702) Hearsay. (Evid. C. §1200) Improper lay opinion; opinion based on improper matter. (Evid. C. §§800, 803) Oral testimony inadmissible to prove the contents of a writing. (Evid. C. §1523) <b>WATERMASTER'S RESPONSE:</b> Evidence Code Section 210 defines relevant evidence as evidence, including evidence relevant to the credibility of a witness or hearsay declarant, having any tendency in reason to prove or disprove any disputed fact that is of consequence to the determination of the action. This statement is relevant as it goes to the Watermaster's decision to rely upon the model prepared by WEI. Evidence Code Section 403(a)(2) sets forth that foundation is sufficient where the "preliminary fact is within the personal knowledge of a witness concerning the subject matter of his testimony." As the declarant is the General Manager for Watermaster, declared that he attended all of the meetings, and is including this statement in

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MATERIALS OBJECTED TO:	GROUND FOR OBJECTION:
<b>Declaration of Peter Kavounas</b>	
	his declaration, he has the appropriate foundation for this statement. There is no out of court statement being offered for the truth of the matter asserted in this statement so there is no validity to the hearsay objection. Finally, there is no testimony in this statement being offered to prove the content of the writing.
7. "In October and November of 2014, the Watermaster Parties, at the Pool Committee, Advisory Committee and Watermaster Board meetings, discussed various approaches to the determination and reset." (Para. 10, lines 3-5.)	Irrelevant and immaterial. (Evid. C. §350) Lacks foundation. (Evid. C. §702) Hearsay. (Evid. C. §1200) <b>WATERMASTER'S RESPONSE:</b> Evidence Code Section 210 defines relevant evidence as evidence, including evidence relevant to the credibility of a witness or hearsay declarant, having any tendency in reason to prove or disprove any disputed fact that is of consequence to the determination of the action. This statement is relevant as it goes to the Watermaster's decision to rely upon the model prepared by WEI. Evidence Code Section 403(a)(2) sets forth that foundation is sufficient where the "preliminary fact is within the personal knowledge of a witness concerning the subject matter of his testimony." As the declarant is the General Manager for



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<b>MATERIALS OBJECTED TO:</b>  <b>Declaration of Peter Kavounas</b>	<b>GROUND FOR OBJECTION:</b>
	Watermaster, declared that he attended all of the meetings, and is including this statement in his declaration, he has the appropriate foundation for this statement. There is no out of court statement being offered for the truth of the matter asserted in this statement so there is no validity to the hearsay objection.
8. "In November, 2014, the Advisory Committee requested, and the Watermaster Board adopted, the Advisory Committee's recommendation that Watermaster convene a facilitated process to identify and resolve all Issues related to the successful completion of the Safe Yield redetermination for consideration by the Pool Committees, Advisory Committee and Watermaster Board in mid-2015." (Para. 10, lines 5-9.)	Irrelevant and immaterial. (Evid. C. §350) Lacks foundation. (Evid. C. §702) Hearsay. (Evid. C. §1200) <b>WATERMASTER'S RESPONSE:</b> Evidence Code Section 210 defines relevant evidence as evidence, including evidence relevant to the credibility of a witness or hearsay declarant, having any tendency in reason to prove or disprove any disputed fact that is of consequence to the determination of the action. This statement is relevant as it goes to the Watermaster's decision to rely upon the model prepared by WEI. Evidence Code Section 403(a)(2) sets forth that foundation is sufficient where the "preliminary fact is within the personal knowledge of a witness concerning the subject matter of his testimony." As the declarant is the General Manager for

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<b>MATERIALS OBJECTED TO:</b>  <b>Declaration of Peter Kavounas</b>	<b>GROUND FOR OBJECTION:</b>
	Watermaster, declared that he attended all of the meetings, and is including this statement in his declaration, he has the appropriate foundation for this statement. There is no out of court statement being offered for the truth of the matter asserted in this statement so there is no validity to the hearsay objection.
9. "In order to protect the confidentiality of their discussions, as well as to preserve Watermaster counsel's ability to full and fairly represent Watermaster, a substantial number of parties executed a Facilitation and Non-Disclosure Agreement (FANDA)." (Para. 12, lines 14-16.)	Irrelevant and immaterial. (Evid. C. §350) Lacks foundation. (Evid. C. §702) Hearsay. (Evid. C. §1200) Oral testimony inadmissible to prove the contents of a writing. (Evid. C. §1523) <b>WATERMASTER'S RESPONSE:</b> Evidence Code Section 210 defines relevant evidence as evidence, including evidence relevant to the credibility of a witness or hearsay declarant, having any tendency in reason to prove or disprove any disputed fact that is of consequence to the determination of the action. This statement is relevant as it goes to the Watermaster's decision. Evidence Code Section 403(a)(2) sets forth that foundation is sufficient where the "preliminary fact is within the personal knowledge of a witness concerning the subject matter of his testimony."

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<b>MATERIALS OBJECTED TO:</b>  <b>Declaration of Peter Kavounas</b>	<b>GROUNDS FOR OBJECTION:</b>
	<p>As the declarant is the General Manager for Watermaster, declared that he attended all of the meetings, and is including this statement in his declaration, he has the appropriate foundation for this statement. There is no out of court statement being offered for the truth of the matter asserted in this statement so there is no validity to the hearsay objection. Finally, there is no testimony in this statement being offered to prove the content of the writing.</p>
<p>10. "The parties to the facilitation process met at least weekly and, in many cases, multiple times per week, in an attempt to achieve consensus as to the Safe Yield reevaluation and reset issues. In total, in addition to the many informal meetings and discussions that took place, the group of parties met more than 30 times." (Para. 13.)</p>	<p>Irrelevant and immaterial. (Evid. C. §350) Lacks foundation. (Evid. C. §702)</p> <p><b>WATERMASTER'S RESPONSE:</b></p> <p>Evidence Code Section 210 defines relevant evidence as evidence, including evidence relevant to the credibility of a witness or hearsay declarant, having any tendency in reason to prove or disprove any disputed fact that is of consequence to the determination of the action. This statement is relevant as it goes to the Watermaster's decision. Evidence Code Section 403(a)(2) sets forth that foundation is sufficient where the "preliminary fact is within the personal knowledge of a witness concerning the subject matter of his testimony."</p>

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<b>MATERIALS OBJECTED TO:</b>  <b>Declaration of Peter Kavounas</b>	<b>GROUND FOR OBJECTION:</b>
	As the declarant is the General Manager for Watermaster, declared that he attended all of the meetings, and is including this statement in his declaration, he has the appropriate foundation for this statement.
11. "On August 26, 2015, agreement was reached as to a substantially complete draft of the 2015 Safe Yield Reset Agreement." (Para. 15, lines 3-5.)	Irrelevant and immaterial. (Evid. C. §350)  Lacks foundation. (Evid. C. §702)  Hearsay. (Evid. C. §1200) Improper lay opinion; opinion based on improper matter. (Evid. C. §§800, 803)  Oral testimony inadmissible to prove the contents of a writing. (Evid. C. §1523)  <b>WATERMASTER'S RESPONSE:</b>  Evidence Code Section 210 defines relevant evidence as evidence, including evidence relevant to the credibility of a witness or hearsay declarant, having any tendency in reason to prove or disprove any disputed fact that is of consequence to the determination of the action. This statement is relevant as it goes to the Watermaster's decision. Evidence Code Section 403(a)(2) sets forth that foundation is sufficient where the "preliminary fact is within the personal knowledge of a witness concerning the subject matter of his testimony."

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<p><b>MATERIALS OBJECTED TO:</b></p> <p><b>Declaration of Peter Kavounas</b></p>	<p><b>GROUND FOR OBJECTION:</b></p>
	<p>As the declarant is the General Manager for Watermaster, declared that he attended all of the meetings, and is including this statement in his declaration, he has the appropriate foundation for this statement. There is no out of court statement being offered for the truth of the matter asserted in this statement so there is no validity to the hearsay objection. Finally, there is no testimony in this statement being offered to prove the content of the writing. It is simply a summary.</p>
<p>12. "Attached hereto as Attachment "1" is the staff presentation, <i>Resolution 2015- 06: Resolution of the Chino Basin Watermaster Regarding 2015 Safe Yield Reset Agreement</i>, that was given to the Board at its September 24, 2015 meeting." 26 (Para. 17, lines 12-14.)</p>	<p>Irrelevant and immaterial. (Evid. C. §350) Lacks foundation. (Evid. C. §702) Hearsay. (Evid. C. §1200) Oral testimony inadmissible to prove the contents of a writing. (Evid. C. §1523) <b>WATERMASTER'S RESPONSE:</b> Evidence Code Section 210 defines relevant evidence as evidence, including evidence relevant to the credibility of a witness or hearsay declarant, having any tendency in reason to prove or disprove any disputed fact that is of consequence to the determination of the action. This statement identifies the title of the exhibit and provides background</p>

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<b>MATERIALS OBJECTED TO:</b>  <b>Declaration of Peter Kavounas</b>	<b>GROUND FOR OBJECTION:</b>
	<p>information on the exhibit. Evidence Code Section 403(a)(2) sets forth that foundation is sufficient where the "preliminary fact is within the personal knowledge of a witness concerning the subject matter of his testimony." As the declarant is the General Manager for the entity that prepared the exhibit and he attended the meeting in question, he has the appropriate foundation for this statement. There is no out of court statement at issue in this paragraph. Finally, there is no testimony in this statement being offered to prove the content of the writing.</p>
<p>13. "Attached hereto as Attachment "2" is the Staff Report, Chino Basin Safe Yield Redetermination and Reset, that was included in the September 24, 2015 Watermaster Board Meeting agenda." (Para. 17, lines 14-16.)</p>	<p>Irrelevant and immaterial. (Evid. C. §350) Lacks foundation. (Evid. C. §702) Hearsay. (Evid. C. §1200) Oral testimony inadmissible to prove the contents of a writing. (Evid. C. §1523)</p> <p><b>WATERMASTER'S RESPONSE:</b></p> <p>Evidence Code Section 210 defines relevant evidence as evidence, including evidence relevant to the credibility of a witness or hearsay declarant, having any tendency in reason to prove or disprove any disputed fact that is of consequence to the determination of</p>

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<b>MATERIALS OBJECTED TO:</b>  <b>Declaration of Peter Kavounas</b>	<b>GROUND FOR OBJECTION:</b>
	<p>the action. This statement identifies the title of the exhibit and provides background information on the exhibit. Evidence Code Section 403(a)(2) sets forth that foundation is sufficient where the "preliminary fact is within the personal knowledge of a witness concerning the subject matter of his testimony." As the declarant is the General Manager for the entity that prepared the exhibit and he attended the meeting in question, he has the appropriate foundation for this statement. There is no out of court statement at issue in this paragraph. Finally, there is no testimony in this statement being offered to prove the content of the writing.</p>
<p>14. "Based on their participation in the process described above, it is my belief that the Parties to the Judgment have engaged in peer review of the Safe Yield evaluation and have an understanding of implementation challenges in Watermaster accounting in light of a decline." (Para. 19, lines 20-22.)</p>	<p>Irrelevant and immaterial. (Evid. C. §350) Lacks foundation. (Evid. C. §702) Hearsay. (Evid. C. §1200) Improper lay opinion; opinion based on improper matter. (Evid. C. §§800, 803) <b>WATERMASTER'S RESPONSE:</b> Evidence Code Section 210 defines relevant evidence as evidence, including evidence relevant to the credibility of a witness or hearsay declarant, having any tendency in</p>

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MATERIALS OBJECTED TO:	GROUNDS FOR OBJECTION:
<b>Declaration of Peter Kavounas</b>	
	reason to prove or disprove any disputed fact that is of consequence to the determination of the action. This statement identifies the basis for his opinion. Evidence Code Section 403(a)(2) sets forth that foundation is sufficient where the “preliminary fact is within the personal knowledge of a witness concerning the subject matter of his testimony.” As the declarant is the General Manager for the entity that worked with the parties, and attended the meetings, he has the appropriate foundation for this statement. There is no out of court statement at issue in this paragraph. Finally, the witness is permitted to offer his lay opinion and the objection goes to weight, not admissibility.
15. "Pursuant to the 2013 Amendment to the 2010 Recharge Master Plan Update ('2013 RMPU Amendment'), presented to and approved by the Court in October 2013, Watermaster has developed and is in the process of implementing a group of 'yield enhancement' projects." (Para. 20, lines 23-26.)	Irrelevant and immaterial. (Evid. C. §350) Lacks foundation. (Evid. C. §702) Hearsay. (Evid. C. §1200) Improper lay opinion; opinion based on improper matter. (Evid. C. §§800, 803) Oral testimony inadmissible to prove the contents of a writing. (Evid. C. §1523) <b>WATERMASTER'S RESPONSE:</b> Evidence Code Section 210 defines relevant



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<b>MATERIALS OBJECTED TO:</b>  <b>Declaration of Peter Kavounas</b>	<b>GROUND FOR OBJECTION:</b>
	<p>evidence as evidence, including evidence relevant to the credibility of a witness or hearsay declarant, having any tendency in reason to prove or disprove any disputed fact that is of consequence to the determination of the action. This statement provides background information on what the Watermaster did. Evidence Code Section 403(a)(2) sets forth that foundation is sufficient where the "preliminary fact is within the personal knowledge of a witness concerning the subject matter of his testimony." As the declarant is the General Manager for the entity that worked with, assisted, and is in the process of implementing, he has the appropriate foundation for this statement. There is no out of court statement at issue in this paragraph. There is no testimony in this statement being offered to prove the content of the writing. While there is no opinion testimony in this statement, to the degree there was, it would go to weight, not admissibility.</p>
16. "The composition of the suite of yield enhance [sic] projects has changed somewhat since the Court's October 2013 approval of the	<p>Irrelevant and immaterial. (Evid. C. §350)</p> <p>Lacks foundation. (Evid. C. §702)</p> <p>Hearsay. (Evid. C. §1200)</p>

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<b>MATERIALS OBJECTED TO:</b>	<b>GROUND FOR OBJECTION:</b>
<b>Declaration of Peter Kavounas</b>	
2013 RMPU Amendment, and the currently contemplated suite of improvements is projected to result in an average of approximately 6,410 acre-feet of additional annual storm water recharge to the Chino Basin." (Para. 20, lines 26-1.)	Improper lay opinion; opinion based on improper matter. (Evict. C. §§800, 803)  Oral testimony inadmissible to prove the contents of a writing. (Evid. C. §1523)  <b>WATERMASTER'S RESPONSE:</b>  Evidence Code Section 210 defines relevant evidence as evidence, including evidence relevant to the credibility of a witness or hearsay declarant, having any tendency in reason to prove or disprove any disputed fact that is of consequence to the determination of the action. This statement provides background information on what the Watermaster did and is doing. Evidence Code Section 403(a)(2) sets forth that foundation is sufficient where the "preliminary fact is within the personal knowledge of a witness concerning the subject matter of his testimony." As the declarant is the General Manager for the entity that worked with, assisted, and is in the process of implementing, he has the appropriate foundation for this statement. There is no out of court statement at issue in this paragraph. There is no testimony in this statement being offered to prove the content of the writing.

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<b>MATERIALS OBJECTED TO:</b>  <b>Declaration of Peter Kavounas</b>	<b>GROUND FOR OBJECTION:</b>
	While there is no opinion testimony in this statement, to the degree there was, it would go to weight, not admissibility.
17. "There may be members of the Appropriative Pool that, because of the projected future water demands within their systems and their existing supply portfolios, do not desire the additional projected recharge associated with new stormwater projects."  (Para. 21, lines 2-4.)	Irrelevant and immaterial. (Evid. C. §350)  Lacks foundation. (Evid. C. §702)  Hearsay. (Evid. C. §1200)  Improper lay opinion; opinion based on improper matter. (Evid. C. §§800, 803)  <b>WATERMASTER'S RESPONSE:</b>  Evidence Code Section 210 defines relevant evidence as evidence, including evidence relevant to the credibility of a witness or hearsay declarant, having any tendency in reason to prove or disprove any disputed fact that is of consequence to the determination of the action. This statement provides background information on what the Watermaster did.  Evidence Code Section 403(a)(2) sets forth that foundation is sufficient where the "preliminary fact is within the personal knowledge of a witness concerning the subject matter of his testimony." As the declarant is the General Manager for the entity that worked with, assisted, and is in the process of implementing, he has the appropriate foundation for this

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<b>MATERIALS OBJECTED TO:</b>  <b>Declaration of Peter Kavounas</b>	<b>GROUND FOR OBJECTION:</b>
	statement. There is no out of court statement at issue in this paragraph. While there is no opinion testimony in this statement, to the degree there was, it would go to weight, not admissibility.
18. "There are other parties within the Appropriative Pool, particularly those with service areas in which there has been substantial growth since the time of the 1978 entrance of the Judgment, that may desire to assume the financial obligations of those parties in exchange for the potential net new recharge that is projected to arise from the suite of projects." (Para. 21, lines 4-8.)	Irrelevant and immaterial. (Evid. C. §350) Lacks foundation. (Evid. C. §702) Hearsay. (Evid. C. §1200) Improper lay opinion; opinion based on improper matter. (Evid. C. §§800, 803) ) <b>WATERMASTER'S RESPONSE:</b> Evidence Code Section 210 defines relevant evidence as evidence, including evidence relevant to the credibility of a witness or hearsay declarant, having any tendency in reason to prove or disprove any disputed fact that is of consequence to the determination of the action. This statement provides background information on what the Watermaster did. Evidence Code Section 403(a)(2) sets forth that foundation is sufficient where the "preliminary fact is within the personal knowledge of a witness concerning the subject matter of his testimony." As the declarant is the General Manager for the entity that worked with,

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MATERIALS OBJECTED TO:	GROUNDS FOR OBJECTION:
Declaration of Peter Kavounas	assisted, and is in the process of implementing, he has the appropriate foundation for this statement. There is no out of court statement at issue in this paragraph. While there is no opinion testimony in this statement, to the degree there was, it would go to weight, not admissibility.

Dated: February 1, 2016

BROWNSTEIN HYATT FARBER  
SCHRECK, LLP



By: \_\_\_\_\_  
SCOTT S. SLATER  
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ATTORNEYS FOR  
CHINO BASIN WATERMASTER

**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. WATERMASTER'S RESPONSE TO CITY OF CHINO'S OBJECTIONS TO DECLARATION OF PETER KAVOUNAS SUBMITTED IN SUPPORT OF WATERMASTER'S MOTION REGARDING 2015 SAFE YIELD RESET AGREEMENT, AMENDMENT OF RESTATED JUDGMENT, PARAGRAPH 6

/ 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**

/ BY PERSONAL SERVICE: I caused such envelope to be delivered by hand to the addressee.

/ BY FACSIMILE: I transmitted said document by fax transmission from (909) 484-3890 to the fax number(s) indicated. The transmission was reported as complete on the transmission report, which was properly issued by the transmitting fax machine.

/ X / BY ELECTRONIC MAIL: I transmitted notice of availability of electronic documents by electronic transmission to the email address indicated. The transmission was reported as complete on the transmission report, which was properly issued by the transmitting electronic mail device.

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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Chino Basin Watermaster

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