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EXEMPT FROM FILING FEES
PURSUANT TO GOV. CODE, § 6103

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN BERNARDINO

CHINO BASIN MUNICIPAL WATER
DISTRICT,

Plaintiff,

v.

CITY OF CHINO, et al.,

Defendants.

CASE NO. RCVRS 51010

[ASSIGNED FOR ALL PURPOSES TO THE
HONORABLE GILBERT G. OCHOA]

**CITY OF ONTARIO'S EVIDENTIARY
OBJECTIONS TO DECLARATION OF
AMANDA COKER IN SUPPORT OF
CUCAMONGA VALLEY WATER
DISTRICT'S SUPPLEMENTAL BRIEF
IN SUPPORT OF WATERMASTER'S
MOTION FOR COURT APPROVAL
OF CORRECTED AND AMENDED
FISCAL YEARS 2021/22 AND 2022/23
ASSESSMENT PACKAGES AND
OPPOSITION TO THE CITY OF
ONTARIO'S CHALLENGE TO
WATERMASTER'S APPROVAL OF
THE CORRECTED AND AMENDED
FISCAL YEARS 2021/22 AND 2022/23
ASSESSMENT PACKAGES**

Hearing:

Date: August 14, 2026

Time: 10:00 a.m.

Department: R17

1 City of Ontario (“Ontario”) respectfully submits the following evidentiary objections to the
2 Declaration of Amanda Coker (“Declarant”) in Support of Defendant Cucamonga Valley Water
3 District’s Supplemental Brief in Support of Watermaster’s Motion for Court Approval of the
4 Corrected and Amended Fiscal Years 2021/22 and 2022/23 Assessment Packages and Opposition
5 to the City of Ontario’s Challenge to Watermaster’s Approval of the Corrected and Amended Fiscal
6 Years 2021/22 and 2022/23 Assessment Packages (“Coker Decl.”), filed July 10, 2026, and the
7 Exhibits referenced and attached to said declaration. Pursuant to Code of Civil Procedure section
8 436 and in accordance with the objections set forth herein, Ontario requests that the Court strike
9 the Coker Decl. in its entirety, or in the alternative, strike the specific paragraphs referenced below
10 and Exhibits A, D and E.

11 **I. GENERAL OBJECTIONS TO DECLARATION OF AMANDA COKER**

12 Ontario respectfully submits this general objection to the Coker Decl. in support of the
13 Cucamonga Valley Water District’s Supplemental Brief as irrelevant to the limited issue before the
14 Court whether Watermaster has complied with the Court of Appeal’s directive to correct and revise
15 the assessment packages consistent with the original DYY Program agreements, the Judgment, and
16 prior court orders. The supporting declaration largely focuses on issues irrelevant to that narrow
17 issue, including raising the rationale of Opposing Parties’ prior decisions to use DYY Program
18 water under the 2019 Letter Agreement, the associated costs of doing so, the history of desalters
19 and DRO obligations, and potential future issues with the DYY Program. None of these issues are
20 relevant to the limited issue before the court that the assessment packages be revised consistent
21 with the original DYY Program agreements. Nor do they provide justification or support for
22 Watermaster to treat the produced water at issue by Fontana and CVWD in the CAA Packages as
23 “DYY production” that is exempt from DRO assessments because that is not authorized by the
24 original DYY agreements and prior court orders. For example, the Opinion makes clear that
25 Fontana is not authorized to recover stored and supplemental water under the DYY Program as it
26 did not have a court approved local agency agreement. None of the above issues are relevant to or
27 change that result. Moreover, issues raised by the Opposing Parties concerning their purported
28 reliance on the 2019 Letter Agreement and financial impacts relating thereto also are not relevant

to changing the Opinion’s directive, and these issues were previously raised and disregarded by the Court of Appeal.

Exhibits A, D and E also are offered as evidence of CVWD’s reliance on the decision it made to take DYY water and potential future issues with the operation of the DYY Program. Such evidence is not relevant, based on speculation and inadmissible. (Evid. Code, §§ 702, 800; *see People v. Chatman* (2006) 38 Cal.4th 344, 382 [“No witness may give testimony based on conjecture or speculation.”].)

II. SPECIFIC OBJECTIONS TO THE DECLARATION OF AMANDA COKER

DECLARATION OF AMANDA COKER IN SUPPORT DEFENDANT CUCAMONGA VALLEY WATER DISTRICT’S SUPPLEMENTAL BRIEF IN SUPPORT OF WATERMASTER’S MOTION COURT APPROVAL OF THE CORRECTED AND AMENDED FISCAL YEARS 2021/2022 AND 2022/2023 ASSESSMENT PACKAGES AND OPPOSITION TO THE CITY OF ONTARIO’S CHALLENGE TO WATERMASTER’S APPROVAL OF THE CORRECTED AND AMENDED FISCAL YEARS 2021/22 AND 2022/23 ASSESSMENT PACKAGES

Material Objected To	Grounds for Objection	Ruling
1. Declaration of Amanda Coker, ¶ 3, page 2, line 27–page 3, line 10: “CVWD intentionally uses imported water during normal and wet years to reduce stress on Chino Basin groundwater supplies and to preserve groundwater storage for droughts, emergencies, or times when imported water deliveries from Metropolitan are reduced. Establishing a significant baseline of imported water usage is important to CVWD for ensuring access to imported water supplies during dry year allocations. This is because the amount of imported water an agency uses over time helps establish a higher baseline for future allocation years, when imported water access can be rationed by Metropolitan as a result of cutbacks on the State Water Project. The higher the baseline of annual imported water use an	Irrelevant. Evid. Code §§ 210, 350. CVWD’s historical use of water is irrelevant to Ontario’s opposition to Watermaster’s motion, the issues in the supplemental briefing, and Ontario’s effort to enforce the Court Appeal’s Opinion directing Watermaster to correct and amend the FY 2021/2022 and 2022/2023 Assessment Packages consistent with the original DYY Program agreements, the Judgment, and prior court orders. In its Opinion, the Court of Appeal found that Watermaster’s interpretation and application of the 2019 Letter Agreement to approve the Assessment Packages “violated the Judgment and the agreements that created the DYY Program” and the 2019 Letter Agreement is not court approved or one of the original DYY Program agreements, and therefore, the produced water in the corrected	Sustained: ____ Overruled: ____

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agency establishes, the more that agency is able to purchase from Metropolitan at the normal cost during years where Metropolitan does not have enough water to meet all demands. By buying imported water during normal and wet years, even at higher cost than other available options, CVWD reduces the risk of future shortages and cost overruns during drought years.”	assessment packages cannot be designated as DYY water. Lacks foundation and personal knowledge; speculative. Evid. Code §§ 403, 702(a) and 800. Declarant fails to lay proper foundation or establish personal knowledge for Metropolitan’s decisions and available water supply. Improper Opinion. Evid. Code §§ 800–804. Declarant’s testimony consists of inadmissible opinions, including without limitation, regarding the referenced water use, baselines, and effects.	
2. Declaration of Amanda Coker, ¶ 4, page 3, lines 11–15: “After the 2015-2016 drought, CVWD adopted a deliberate strategy to increase its use of imported water to approximately 30,000 acre-feet per year beginning in Fiscal Years 2018 and 2019. This approach was intended to allow CVWD to meet customer demand without over-pumping groundwater, to avoid costly replenishment obligations, and to build CVWD’s imported water baselines for future droughts.”	Irrelevant. Evid. Code §§ 210, 350. CVWD’s historical strategy, approach, and reasoning for water use and speculation as to future events and penalties is irrelevant to Ontario’s opposition to Watermaster’s motion, the issues in the supplemental briefing, and Ontario’s effort to enforce the Court Appeal’s Opinion directing Watermaster to correct and amend the FY 2021/2022 and 2022/2023 Assessment Packages consistent with the original DYY Program agreements, the Judgment, and prior court orders. In its Opinion, the Court of Appeal found that Watermaster’s interpretation and application of the 2019 Letter Agreement to approve the Assessment Packages “violated the Judgment and the agreements that created the DYY Program” and the 2019 Letter Agreement is not court approved or one of the original DYY Program	Sustained: ____ Overruled: ____

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	agreements, and therefore, the produced water in the corrected assessment packages cannot be designated as DYY water. Lacks foundation and personal knowledge; speculative. Evid. Code §§ 403, 702(a) and 800. Declarant fails to lay proper foundation or establish personal knowledge of the reasons underlying CVWD's conduct and replenishment obligations. The testimony consists of speculation as to customer demand and unspecified replenishment obligations. Improper Opinion. Evid. Code §§ 800-804. Declarant's testimony consists of inadmissible opinions, including without limitation, regarding the referenced historical strategy.	
3. Declaration of Amanda Coker, ¶ 5, page 3, line 16–page 4, line 11; Ex. A: “Following the drought in 2015-2016, there was a wet winter in 2016/17, leading to a request from MWD on June 23, 2017 to deliver excess supplies to be recharged into the Chino Basin under the DYY program. Recognizing CVWD's unique ability to shift from high volumes of MWD imported water purchases to a corresponding high volume of stored imported water extraction by CVWD's wells, CVWD was urged to make an operational change by Watermaster	Irrelevant. Evid. Code §§ 210, 350. CVWD's reasons for its failure to comply is irrelevant to Ontario's opposition to Watermaster's motion, the issues in the supplemental briefing, and Ontario's effort to enforce the Court Appeal's Opinion directing Watermaster to correct and amend the FY 2021/2022 and 2022/2023 Assessment Packages consistent with the original DYY Program agreements, the Judgment, and prior court orders. In its Opinion, the Court of Appeal found that Watermaster's interpretation and application of the 2019 Letter Agreement to approve the Assessment Packages “violated the Judgment and the agreements that created the DYY Program” and the 2019 Letter	Sustained: ____ Overruled: ____

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and IEUA. Specifically, CVWD was asked to pump Metropolitan's stored water from the State Water Project in order to make sure the additional water added to the DYY program by Metropolitan in 2017 could and would be extracted by the end of the DYY Program amidst challenges with other DYY parties' ability to perform their obligations under the DYY Program. This change sought by Metropolitan and IEUA ultimately resulted in the 2019 letter agreement. CVWD was willing to assist Watermaster, IEUA and Metropolitan by taking more stored imported water from the DYY accounts during the 2020-21 and 2021-22 production years, rather than imported water, because it dovetailed with CVWD's existing strategy to increase CVWD's imported water baseline. Metropolitan treated the withdrawal of its stored imported water in the Chino Basin per the DYY Program the same as it treated the delivery of imported water to CVWD via a pipe for purposes of ensuring CVWD had a sufficiently large, imported water baseline. Moreover, assisting Metropolitan per their request would also support other DYY participating agencies who had indicated they were unable to withdraw the requisite amount of water to "perform" under the amended DYY Program Agreement prior to the end of the DYY	Agreement is not court approved or one of the original DYY Program agreements. Ontario also objects to Exhibit A because CVWD's reliance is irrelevant and this issue was raised before the Court of Appeal and disregarded. Lacks foundation and personal knowledge; speculative. Evid. Code §§ 403, 702(a) and 800. Declarant fails to lay proper foundation or establish personal knowledge of the unsustainability of increased groundwater pumping, unspecified "certain levels," the "finite" groundwater rights, and CVWD's "historical reliance." The testimony consists of speculation as to the water to be extracted under the DYY Program and Metropolitan's actions and reasons for said actions. Improper Opinion. Evid. Code §§ 800-804. Declarant's testimony consists of inadmissible opinions, including without limitation, regarding the reasons for MWD's and IEUA's requests and the DYY Program, and other DYY participating agencies' actions. Hearsay. Evid. Code § 1200. Declarant's testimony regarding what MWD and IEUA sought and requested and statements by other DYY participating agencies is inadmissible hearsay.	

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Program in 2028. Failure to collectively perform within the Chino Basin by withdrawing all stored Metropolitan water by 2028 would trigger significant penalties under the terms of the DYY Program. Attached hereto as Exhibit A is a true and correct copy of a letter CVWD dated August 6, 2025 that CVWD sent to Watermaster regarding CVWD's reliance on Metropolitan and IEUA in deciding to take stored DYY imported water rather than imported water through a pipeline."		
4. Declaration of Amanda Coker, ¶ 6, page 4, lines 12-18: "CVWD cannot sustainably increase groundwater pumping beyond certain levels because groundwater rights in the Chino Basin are finite and are based on a percentage of the safe yield of the Chino Basin. Producing more groundwater than allowed either depletes stored reserves or requires CVWD to incur significant additional costs to replace or replenish that water. As a result, CVWD has never historically relied on groundwater production at the elevated levels now being proposed by Ontario for assessment, which significantly exceeds CVWD's annual groundwater production right."	Irrelevant. Evid. Code §§ 210, 350. CVWD's historical use of water and costs are irrelevant to Ontario's opposition to Watermaster's motion, the issues in the supplemental briefing, and Ontario's effort to enforce the Court Appeal's Opinion directing Watermaster to correct and amend the FY 2021/2022 and 2022/2023 Assessment Packages consistent with the original DYY Program agreements, the Judgment, and prior court orders. In its Opinion, the Court of Appeal found that Watermaster's interpretation and application of the 2019 Letter Agreement to approve the Assessment Packages "violated the Judgment and the agreements that created the DYY Program" and the 2019 Letter Agreement is not court approved or one of the original DYY Program agreements. Improper Opinion. Evid. Code §§ 800-804.	Sustained: ____ Overruled: ____

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	Declarant's testimony consists of inadmissible opinions, including without limitation, regarding the referenced water use and reliance, baselines, and effects.	
5. Declaration of Amanda Coker, ¶ 7, page 4, lines 19-28: "The DYY Program allows Metropolitan to store imported water underground in the Chino Basin during wet years so that it can be recovered during dry years. The water stored in the DYY account is owned by Metropolitan. When local agencies produce DYY water, they are pumping Metropolitan-owned water which was transported from Northern California and delivered to the Chino Basin where it was percolated into the ground for later use. It is not native groundwater, and Metropolitan does not treat it as such. Withdrawals of DYY water stored by Metropolitan are credited by Metropolitan as the take of imported water—both in the calculation of Metropolitan's readiness to serve charge ("RTS") and in establishing a higher baseline of historic imported water for purposes of future cutbacks by Metropolitan when it has insufficient water from the State Water Project."	Irrelevant. Evid. Code §§ 210, 350. CVWD's historical strategy, approach, and reasoning for water use and speculation as to future events and RTS charges are irrelevant to Ontario's opposition to Watermaster's motion, the issues in the supplemental briefing, and Ontario's effort to enforce the Court Appeal's Opinion directing Watermaster to correct and amend the FY 2021/2022 and 2022/2023 Assessment Packages consistent with the original DYY Program agreements, the Judgment, and prior court orders. In its Opinion, the Court of Appeal found that Watermaster's interpretation and application of the 2019 Letter Agreement to approve the Assessment Packages "violated the Judgment and the agreements that created the DYY Program" and the 2019 Letter Agreement is not court approved or one of the original DYY Program agreements, and therefore, the produced water in the corrected assessment packages cannot be designated as DYY water. Lacks foundation and personal knowledge; speculative. Evid. Code §§ 403, 702(a) and 800. Declarant fails to lay proper foundation or establish personal knowledge of the reasons underlying CVWD's and "local agencies" conduct, MWD's actions with respect to credits, the alleged RTS charges.	Sustained: ____ Overruled: ____

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	The testimony consists of speculation as to the reasons for the parties' stated conduct, the Watermaster's needs, MWD's future cutbacks, and the unspecified RTS charges. Hearsay. Evid. Code § 1200. CVWD's testimony regarding the MWD's "actions is based on hearsay. Improper Opinion. Evid. Code §§ 800-804. Declarant's testimony consists of inadmissible opinions, including without limitation, regarding the referenced historical strategy and use, MWD's actions, and RTS charges.	
6. Declaration of Amanda Coker, ¶ 8, page 5, lines 1-8: "In 2019, a Letter Agreement initiated by Metropolitan, the owner of the stored water in the DYY Program, authorized agencies such as CVWD to voluntarily pump water from the DYY storage account. When CVWD did so, it reduced its other imported water purchases from Metropolitan via pipeline from IEUA and instead withdrew Metropolitan's imported water through CVWD's groundwater wells. The water CVWD withdrew had been delivered by MWD to IEUA and recharged into the Basin in 2017 and 2018. Importantly, CVWD paid Metropolitan for the stored imported water CVWD withdrew	Irrelevant. Evid. Code §§ 210, 350. CVWD's reasons for its decisions for use of DYY water and water rates are irrelevant to Ontario's opposition to Watermaster's motion, the issues in the supplemental briefing, and Ontario's effort to enforce the Court Appeal's Opinion directing Watermaster to correct and amend the FY 2021/2022 and 2022/2023 Assessment Packages consistent with the original DYY Program agreements, the Judgment, and prior court orders. In its Opinion, the Court of Appeal found that Watermaster's interpretation and application of the 2019 Letter Agreement to approve the Assessment Packages "violated the Judgment and the agreements that created the DYY Program" and the 2019 Letter Agreement is not court approved or one of the original DYY Program agreements.	Sustained: ____ Overruled: ____

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per the 2019 Letter Agreement at the normal imported water rates, including volumetric charges and readiness-to-serve charges.	Lacks foundation and personal knowledge; speculative. Evid. Code §§ 403, 702(a) and 800. Declarant fails to lay proper foundation or establish personal knowledge of the water deliveries and water charges. The testimony consists of speculation as to the other agencies' actions, and accounting for the withdrawal of water. Improper Opinion. Evid. Code §§ 800–804. Declarant's testimony consists of inadmissible opinions, including without limitation, regarding the other agencies' actions and accounting for the withdrawal of water.	
7. Declaration of Amanda Coker, ¶ 9, page 5, lines 9-17: “CVWD’s participation in the DYY Program did not increase its reliance on native groundwater or the Chino Basin’s Safe Yield. Instead, it changed the way CVWD physically received imported water, from delivery of surface water supplies at its treatment plant via a pipeline, to withdrawal of Metropolitan-owned stored imported water from the ground via CVWD’s wells. Had CVWD not participated in the DYY Program, it would have continued purchasing and using similar amounts of imported water through its surface water facilities, and CVWD had no basis to realize it was harming anyone by its voluntary takes.	Irrelevant. Evid. Code §§ 210, 350. CVWD’s historical use of water and past reliance are irrelevant to Ontario’s opposition to Watermaster’s motion, the issues in the supplemental briefing, and Ontario’s effort to enforce the Court Appeal’s Opinion directing Watermaster to correct and amend the FY 2021/2022 and 2022/2023 Assessment Packages consistent with the original DYY Program agreements, the Judgment, and prior court orders. In its Opinion, the Court of Appeal found that Watermaster’s interpretation and application of the 2019 Letter Agreement to approve the Assessment Packages “violated the Judgment and the agreements that created the DYY Program” and the 2019 Letter Agreement is not court approved or one of the original DYY Program agreements. Moreover, arguments raised by CVWD with respect to its reliance on the 2019 Letter Agreement	Sustained: ____ Overruled: ____

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Indeed, CVWD believed it was helping the other DYY participants since some had indicated a future inability to timely perform to Metropolitan's specifications."	were raised before the Court of Appeal and disregarded. Lacks foundation and personal knowledge; speculative. Evid. Code §§ 403, 702(a) and 800. Declarant fails to lay proper foundation or establish personal knowledge of the water deliveries and water charges. The testimony consists of speculation as to the hypothetical event had it not received DYY water. Hearsay. Evid. Code § 1200. CVWD's testimony regarding the DYY participants is inadmissible hearsay. Improper Opinion. Evid. Code §§ 800-804. Declarant's testimony consists of inadmissible opinions, including without limitation, regarding the referenced water use, baselines, and effects.	
8. Declaration of Amanda Coker, ¶ 10, page 5, lines 18-24: "In Production Year 2020-2021 (reflected in the FY 2021/2022 Assessment Package), CVWD purchased 20,500.0 AF of water from Metropolitan though IEUA for \$15,627,100.00 and withdrew an amount corresponding to the amount CVWD paid for Tier 1 Metropolitan water from Watermaster's DYY storage account. When purchasing and	Irrelevant. Evid. Code §§ 210, 350. The effects and cost impacts on CVWD are irrelevant to Ontario's opposition to Watermaster's motion, the issues in the supplemental briefing, and Ontario's effort to enforce the Court Appeal's Opinion directing Watermaster to correct and amend the FY 2021/2022 and 2022/2023 Assessment Packages consistent with the original DYY Program agreements, the Judgment, and prior court orders. In its Opinion,	Sustained: ____ Overruled: ____

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withdrawing this water, CVWD's intent and understanding was that it was pumping imported DYY water, not native groundwater, and Metropolitan credited CVWD's withdrawals as if CVWD had taken imported water."	the Court of Appeal found that Watermaster's interpretation and application of the 2019 Letter Agreement to approve the Assessment Packages "violated the Judgment and the agreements that created the DYY Program" and the 2019 Letter Agreement is not court approved or one of the original DYY Program agreements. Moreover, the issue of what CVWD paid to Metropolitan is irrelevant to the issue of what CVWD owes for the purposes of Chino Basin assessments as a party to the Judgment, and this issue was raised in prior briefing before the Court of Appeal and disregarded. Lacks foundation and personal knowledge; speculative. Evid. Code §§ 403, 702(a) and 800. Declarant fails to lay proper foundation or establish personal knowledge of the effects on CVWD and MWD's actions. The testimony consists of speculation as to the same. Improper Opinion. Evid. Code §§ 800-804. Declarant's testimony consists of inadmissible opinions, including without limitation, regarding the effects of CVWD's participation and MWD's actions.	
9. Declaration of Amanda Coker, ¶ 11, page 5, line 25–page 6, line 2:	Irrelevant. Evid. Code §§ 210, 350.	Sustained: ____ Overruled: ____

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Material Objected To	Grounds for Objection	Ruling
"In Production Year 2021-2022 (reflected in the FY 2022/2023 Assessment Package), CVWD purchased 17,912.7 AF of water from Metropolitan through IEUA for \$14,026,247 and withdrew an amount corresponding to the amount CVWD paid for Tier 1 Metropolitan water from Watermaster's DYY storage account. When purchasing and withdrawing this water, CVWD's intent and understanding was that it was pumping imported DYY water, not native groundwater."	CVWD's costs are irrelevant to Ontario's opposition to Watermaster's motion, the issues in the supplemental briefing, and Ontario's effort to enforce the Court Appeal's Opinion directing Watermaster to correct and amend the FY 2021/2022 and 2022/2023 Assessment Packages consistent with the original DYY Program agreements, the Judgment, and prior court orders. In its Opinion, the Court of Appeal found that Watermaster's interpretation and application of the 2019 Letter Agreement to approve the Assessment Packages "violated the Judgment and the agreements that created the DYY Program" and the 2019 Letter Agreement is not court approved or one of the original DYY Program agreements, and therefore, the produced water in the corrected assessment packages cannot be designated as DYY water. Moreover, the issue of what CVWD paid to Metropolitan is irrelevant to the issue of what CVWD owes for the purposes of Chino Basin assessments as a party to the Judgment, and this issue was raised in prior briefing before the Court of Appeal and disregarded. Lacks foundation and personal knowledge; speculative. Evid. Code §§ 403, 702(a) and 800. Declarant fails to lay proper foundation or establish personal of the	

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	effects on CVWD and MWD's actions. The testimony consists of speculation as to the same. Improper Opinion. Evid. Code §§ 800-804. Declarant's testimony consists of inadmissible opinions, including without limitation, regarding the effects on CVWD and MWD's actions.	
10. Declaration of Amanda Coker, ¶ 12, page 6, lines 3-7: "In addition to purchasing this imported water from Metropolitan, CVWD's pumping of the DYY water was included in the Readiness to Serve ("RTS") charge imposed on users of imported water by IEUA. When accounting for an estimated RTS charge, CVWD will have paid approximately \$34,909,347.00 for the DYY water it withdrew due to purchase of DYY water for these two production years."	Irrelevant. Evid. Code §§ 210, 350. CVWD's costs are irrelevant to Ontario's opposition to Watermaster's motion, the issues in the supplemental briefing, and Ontario's effort to enforce the Court Appeal's Opinion directing Watermaster to correct and amend the FY 2021/2022 and 2022/2023 Assessment Packages consistent with the original DYY Program agreements, the Judgment, and prior court orders. In its Opinion, the Court of Appeal found that Watermaster's interpretation and application of the 2019 Letter Agreement to approve the Assessment Packages "violated the Judgment and the agreements that created the DYY Program" and the 2019 Letter Agreement is not court approved or one of the original DYY Program agreements, and therefore, the produced water in the corrected assessment packages cannot be designated as DYY water. Moreover,	Sustained: ____ Overruled: ____

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Material Objected To	Grounds for Objection	Ruling
	the issue of what CVWD paid to Metropolitan is irrelevant to the issue of what CVWD owes for the purposes of Chino Basin assessments as a party to the Judgment, and this issue was raised in prior briefing before the Court of Appeal and disregarded. Lacks foundation and personal knowledge; speculative. Evid. Code §§ 403, 702(a) and 800. Declarant fails to lay proper foundation or establish personal knowledge of the effects on CVWD and RTS charges. The testimony consists of speculation as to the reasons for CVWD's participation and monetary claims. Improper Opinion. Evid. Code §§ 800-804. Declarant's testimony consists of inadmissible opinions, including without limitation, regarding the effects on CVWD and RTS charges.	
11. Declaration of Amanda Coker, ¶ 13, page 6, lines 8-18: "The RTS charge is a pass-through assessment imposed by IEUA on all parties who purchase imported water in the Chino Basin based on a 10-year rolling average of imported water purchases. For a given year, the total RTS charge, which is imposed on a pro rata basis based upon historic deliveries of imported water, does not change. Instead, the	Irrelevant. Evid. Code §§ 210, 350. CVWD's costs are irrelevant to Ontario's opposition to Watermaster's motion, the issues in the supplemental briefing, and Ontario's effort to enforce the Court Appeal's Opinion directing Watermaster to correct and amend the FY 2021/2022 and 2022/2023 Assessment Packages consistent with the original DYY Program agreements, the Judgment,	Sustained: ____ Overruled: ____

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Material Objected To	Grounds for Objection	Ruling
total charge is passed along to the individual parties who purchase imported water based on that party's pro-rata share of all imported water purchased. Because this RTS calculation properly includes CVWD's DYY withdrawals of Metropolitan's stored water as imported water, CVWD pays a higher proportional share of the RTS than it would if the DYY water was considered physical production of native groundwater. Therefore, if CVWD's DYY pumping was reclassified as simple production of groundwater, CVWD's proportional share of the RTS would have to be reduced. This would result in increased RTS charges for all other parties in the Basin who take imported water."	and prior court orders. In its Opinion, the Court of Appeal found that Watermaster's interpretation and application of the 2019 Letter Agreement to approve the Assessment Packages "violated the Judgment and the agreements that created the DYY Program" and the 2019 Letter Agreement is not court approved or one of the original DYY Program agreements, and therefore, the produced water in the corrected assessment packages cannot be designated as DYY water. Moreover, the issue of what CVWD paid to Metropolitan is irrelevant to the issue of what CVWD owes for the purposes of Chino Basin assessments as a party to the Judgment, and this issue was raised in prior briefing before the Court of Appeal and disregarded. Lacks foundation and personal knowledge; speculative. Evid. Code §§ 403, 702(a) and 800. Declarant fails to lay proper foundation or establish personal knowledge of the effects on CVWD, including the RTS charges. The testimony consists of speculation as to the above including the adjustment of RTS charges. Improper Opinion. Evid. Code §§ 800-804. Declarant's testimony consists of inadmissible opinions, including	

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Material Objected To	Grounds for Objection	Ruling
	without limitation, regarding the effects on CVWD and RTS charges.	
12. Declaration of Amanda Coker, ¶ 14, page 6, lines 19-21: "If CVWD's claimed DYY pumping was really just the physical production of groundwater, CVWD would have never purchased the DYY water from Metropolitan or paid a proportional share of RTS charges on this water."	Irrelevant. Evid. Code §§ 210, 350. CVWD's hypothetical non-participation is irrelevant to Ontario's opposition to Watermaster's motion, the issues in the supplemental briefing, and Ontario's effort to enforce the Court Appeal's Opinion directing Watermaster to correct and amend the FY 2021/2022 and 2022/2023 Assessment Packages consistent with the original DYY Program agreements, the Judgment, and prior court orders. In its Opinion, the Court of Appeal found that Watermaster's interpretation and application of the 2019 Letter Agreement to approve the Assessment Packages "violated the Judgment and the agreements that created the DYY Program" and the 2019 Letter Agreement is not court approved or one of the original DYY Program agreements, and therefore, the produced water in the corrected assessment packages cannot be designated as DYY water. Moreover, the issue of what CVWD paid to Metropolitan is irrelevant to the issue of what CVWD owes for the purposes of Chino Basin assessments as a party to the Judgment, and this issue with respect to RTS charges was raised in prior briefing before the Court of Appeal and disregarded.	Sustained: ____ Overruled: ____

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Material Objected To	Grounds for Objection	Ruling
	Lacks foundation and personal knowledge; speculative. Evid. Code §§ 403, 702(a) and 800. Declarant fails to lay proper foundation or establish personal knowledge of CVWD's hypothetical effects of non-participation. The testimony consists of speculation as to CVWD's hypothetical effects of nonparticipation. Improper Opinion. Evid. Code §§ 800-804. Declarant's testimony consists of inadmissible opinions, including without limitation, regarding CVWD's hypothetical non-compliance and effects of compliance with the Opinion.	
13. Declaration of Amanda Coker, ¶ 15, page 6, lines 22-28: "If CVWD had not voluntarily participated in the DYY Program, it would have continued taking deliveries of similar amounts of imported water through a pipeline, with no increase in groundwater production. Treating DYY withdrawals differently from imported water deliveries, even though both are derived from the same source of supply the State Water Project, has the effect of creating duplicative charges on CVWD for the same imported water, thereby causing substantial financial and operational harm to	Irrelevant. Evid. Code §§ 210, 350. CVWD's hypothetical non-participation is irrelevant to Ontario's opposition to Watermaster's motion, the issues in the supplemental briefing, and Ontario's effort to enforce the Court Appeal's Opinion directing Watermaster to correct and amend the FY 2021/2022 and 2022/2023 Assessment Packages consistent with the original DYY Program agreements, the Judgment, and prior court orders. In its Opinion, the Court of Appeal found that Watermaster's interpretation and application of the 2019 Letter Agreement to approve the Assessment Packages "violated the Judgment and	Sustained: ____ Overruled: ____

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Material Objected To	Grounds for Objection	Ruling
CVWD and creating a large financial windfall for Ontario."	the agreements that created the DYY Program" and the 2019 Letter Agreement is not court approved or one of the original DYY Program agreements, and therefore, the produced water in the corrected assessment packages cannot be designated as DYY water. Moreover, the issue of what CVWD paid to Metropolitan is irrelevant to the issue of what CVWD owes for the purposes of Chino Basin assessments as a party to the Judgment, and this issue was raised in prior briefing before the Court of Appeal and disregarded. Simply put, there is no financial windfall to Ontario because the Court of Appeal found that the improper cost shifting caused financial injury to Ontario and the other participating agencies. Lacks foundation and personal knowledge; speculative. Evid. Code §§ 403, 702(a) and 800. Declarant fails to lay proper foundation or establish personal knowledge of CVWD's hypothetical effects of non-participation. The testimony consists of speculation as to CVWD's hypothetical effects of nonparticipation. Improper Opinion. Evid. Code §§ 800-804. Declarant's testimony consists of inadmissible opinions, including without limitation, regarding CVWD's	

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Material Objected To	Grounds for Objection	Ruling
	hypothetical non-compliance and effects of compliance with the Opinion.	
14. Declaration of Amanda Coker, ¶ 16, page 7, lines 1–11; Ex. B: “If CVWD is now required to return that water to the DYY account, as Ontario requests, or if the same water is reclassified as groundwater production for DRO purposes, CVWD would be charged again, this time as if the water were native groundwater—even though CVWD already paid Metropolitan the full imported water charge for the exact same water. This results in CVWD paying twice for the same water, with a total additional cost to CVWD of \$26,653,347 if CVWD is required to “put the water back”, and Watermaster is required to recalculate CVWD’s Desalter Replenishment Obligation (DRO) as Ontario has requested. On that note, it is improper to include DYY water in DRO calculations because DYY withdrawals are exempt from DRO calculations per a 2019 amendment to the Peace II Agreement. A true and correct copy of the order of the Superior Court dated March 15, 2019 that amended the Peace II Agreement is enclosed herewith as Exhibit B.”	Irrelevant. Evid. Code §§ 210, 350. CVWD’s costs are irrelevant to Ontario’s opposition to Watermaster’s motion, the issues in the supplemental briefing, and Ontario’s effort to enforce the Court Appeal’s Opinion directing Watermaster to correct and amend the FY 2021/2022 and 2022/2023 Assessment Packages consistent with the original DYY Program agreements, the Judgment, and prior court orders. In its Opinion, the Court of Appeal found that Watermaster’s interpretation and application of the 2019 Letter Agreement to approve the Assessment Packages “violated the Judgment and the agreements that created the DYY Program” and the 2019 Letter Agreement is not court approved or one of the original DYY Program agreements, and therefore, the produced water in the corrected assessment packages cannot be designated as DYY water. Moreover, the issue of what CVWD paid to Metropolitan is irrelevant to the issue of what CVWD owes for the purposes of Chino Basin assessments as a party to the Judgment, and this issue was raised in prior briefing before the Court of Appeal and disregarded.	Sustained: ____ Overruled: ____

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Material Objected To	Grounds for Objection	Ruling
	Lacks foundation and personal knowledge; speculative. Evid. Code §§ 403, 702(a) and 800. Declarant fails to lay proper foundation or establish personal knowledge of the effects on CVWD, including the monetary claims, and the amended Peace II Agreement. The testimony consists of speculation as to the reasons for CVWD's participation and monetary claims. Improper Opinion. Evid. Code §§ 800-804. Declarant's testimony consists of inadmissible opinions, including without limitation, regarding the effects of compliance with the Opinion and Peace II Agreement as DRO assessments are required on the production to comply with the Opinion. Secondary Evidence Rule. Evid. Code § 1523. Declarant's oral testimony regarding the contents of the "Peace II Agreement" is inadmissible, which speaks for itself.	
15. Declaration of Amanda Coker, ¶ 17, page 7, lines 12–22: "To date, CVWD has paid approximately \$34.9 million related to its participation in the DYY Program in 2021 and 2022. This amount reflects the cost of purchasing imported water from	Irrelevant. Evid. Code §§ 210, 350. CVWD's costs are irrelevant to Ontario's opposition to Watermaster's motion, the issues in the supplemental briefing, and Ontario's effort to enforce the Court Appeal's Opinion directing Watermaster to correct and amend the FY 2021/2022 and	Sustained: ____ Overruled: ____

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Material Objected To	Grounds for Objection	Ruling
Metropolitan and related charges, but it is a conservative estimate because some of those charges continue for up to ten years after the water is purchased and has not yet been fully paid. If CVWD is now also required to pay additional groundwater assessments, replenishment costs to replenish the DYY storage account, and desalter replacement charges for that same water, CVWD's total cost would rise to approximately \$61.6 million, even though the water was already purchased and paid for as imported water. CVWD had no way to know that they would be incurring these kinds of costs for simply attempting to assist Metropolitan and IEUA rather than taking imported water from a pipeline, which CVWD would have done instead if it had not withdrawn stored imported water via the 2019 Letter Agreement."	2022/2023 Assessment Packages consistent with the original DYY Program agreements, the Judgment, and prior court orders. In its Opinion, the Court of Appeal found that Watermaster's interpretation and application of the 2019 Letter Agreement to approve the Assessment Packages "violated the Judgment and the agreements that created the DYY Program" and the 2019 Letter Agreement is not court approved or one of the original DYY Program agreements, and therefore, the produced water in the corrected assessment packages cannot be designated as DYY water. Moreover, the issue of what CVWD paid to Metropolitan is irrelevant to the issue of what CVWD owes for the purposes of Chino Basin assessments as a party to the Judgment, and this issue was raised in prior briefing before the Court of Appeal and disregarded. Lacks foundation and personal knowledge; speculative. Evid. Code §§ 403, 702(a) and 800. Declarant fails to lay proper foundation or establish personal knowledge of the effects on CVWD, including the monetary claims. The testimony consists of speculation as to the reasons for CVWD's participation and monetary claims. The testimony consists of speculation as to the reasons for CVWD's participation and potential monetary impacts.	

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Material Objected To	Grounds for Objection	Ruling
	Improper Opinion. Evid. Code §§ 800-804. Declarant's testimony consists of inadmissible opinions, including without limitation, regarding the "conservative estimate" and effects of compliance with the Opinion.	
16. Declaration of Amanda Coker, ¶ 18, page 7, lines 23–27: "Additionally, requiring CVWD to return water to the DYY account would substantially reduce CVWD's stored water reserves. These reserves function as a savings account that protects customers during droughts and periods of reduced imported water availability. Depleting these reserves would undermine long-term water reliability for the community CVWD serves."	Irrelevant. Evid. Code §§ 210, 350. The effects on CVWD are irrelevant to Ontario's opposition to Watermaster's motion, the issues in the supplemental briefing, and Ontario's effort to enforce the Court Appeal's Opinion directing Watermaster to correct and amend the FY 2021/2022 and 2022/2023 Assessment Packages consistent with the original DYY Program agreements, the Judgment, and prior court orders. In its Opinion, the Court of Appeal found that Watermaster's interpretation and application of the 2019 Letter Agreement to approve the Assessment Packages "violated the Judgment and the agreements that created the DYY Program" and the 2019 Letter Agreement is not court approved or one of the original DYY Program agreements, and therefore, the produced water in the corrected assessment packages cannot be designated as DYY water.	Sustained: ____ Overruled: ____

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Material Objected To	Grounds for Objection	Ruling
	Lacks foundation and personal knowledge; speculative. Evid. Code §§ 403, 702(a) and 800. Declarant fails to lay proper foundation or establish personal knowledge of the effects on CVWD's compliance with the Opinion including the alleged effect on its reserves. The testimony consists of speculation as to the same. Improper Opinion. Evid. Code §§ 800-804. Declarant's testimony consists of inadmissible opinions, including without limitation, regarding the effects of CVWD's participation and compliance with the Opinion.	
17. Declaration of Amanda Coker, ¶ 19, page 7, line 28–page 8, line 10; Ex. C: “Ontario’s demand that CVWD return 38,421.8 AF of imported water into Metropolitan’s DYY storage account—in addition to 7,500 AF from FWC—would create significant hardship for other DYY parties who are, based upon the information I have obtained at recent IEUA meetings, and from recent communications, regarding the DYY Program, are unable to meet their requirements to fully “perform” by pumping out all DYY water prior to the end of the DYY Program in 2028 at the current DYY account balance at 63,808 AF. Ontario’s request that all DYY	Irrelevant. Evid. Code §§ 210, 350. The impacts on CVWD, its reliance, and future operation of the DYY Program are irrelevant to Ontario’s opposition to Watermaster’s motion, the issues in the supplemental briefing, and Ontario’s effort to enforce the Court Appeal’s Opinion directing Watermaster to correct and amend the FY 2021/2022 and 2022/2023 Assessment Packages consistent with the original DYY Program agreements, the Judgment, and prior court orders. In its Opinion, the Court of Appeal found that Watermaster’s interpretation and application of the 2019 Letter Agreement to approve the Assessment	Sustained: ____ Overruled: ____

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Material Objected To	Grounds for Objection	Ruling
water extracted in FY2021 and FY2022 be "put back" in would increase the total amount in the Metropolitan DYY account to 109,721 AF—which will result in a violation of the 2003 Funding Agreement with Metropolitan since the DYY Account is not allowed to exceed 100,000 AF. A true and correct copy of the 2003 Funding Agreement is attached hereto as Exhibit C."	Packages "violated the Judgment and the agreements that created the DYY Program" and the 2019 Letter Agreement is not court approved or one of the original DYY Program agreements, and therefore, the produced water in the corrected assessment packages cannot be designated as DYY water. Lacks foundation and personal knowledge; speculative. Evid. Code §§ 403, 702(a) and 800. Declarant fails to lay proper foundation or establish personal knowledge of CVWD's reliance, hardship for other DYY parties, and future impacts on the DYY Program. The testimony consists of speculation as to the above. Improper Opinion. Evid. Code §§ 800-804. Declarant's testimony consists of inadmissible opinions, including without limitation, regarding CVWD's "good faith" reliance and operations and effect of compliance with the Opinion. Hearsay. Evid. Code § 1200. Declarant's testimony regarding the alleged impacts on the other "DYY parties" and information obtained at IEUA meetings is inadmissible hearsay.	

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Material Objected To	Grounds for Objection	Ruling
	Secondary Evidence Rule. Evid. Code § 1523. Declarant's oral testimony regarding the contents of the Funding Agreement is inadmissible, which speaks for itself.	
18. Declaration of Amanda Coker, ¶ 20, page 8, lines 11–16: “Additionally, given the difficulty that DYY Program participants other than Cucamonga will experience in fully performing prior to the end of the program on March 1, 2028, the 45,913 AF previously withdrawn by Cucamonga and Fontana significantly benefitted the other DYY Parties as there is now less water in the DYY Account that they will need to withdraw prior to the end of the DYY Program, and they are less likely to incur penalties because of their failure to perform per the DYY Program Agreement (as amended).”	Irrelevant. Evid. Code §§ 210, 350. The future operation of the DYY Program is irrelevant to Ontario's opposition to Watermaster's motion, the issues in the supplemental briefing, and Ontario's effort to enforce the Court Appeal's Opinion directing Watermaster to correct and amend the FY 2021/2022 and 2022/2023 Assessment Packages consistent with the original DYY Program agreements, the Judgment, and prior court orders. In its Opinion, the Court of Appeal found that Watermaster's interpretation and application of the 2019 Letter Agreement to approve the Assessment Packages “violated the Judgment and the agreements that created the DYY Program” and the 2019 Letter Agreement is not court approved or one of the original DYY Program agreements, and therefore, the produced water in the corrected assessment packages cannot be designated as DYY water.	Sustained: ____ Overruled: ____

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Material Objected To	Grounds for Objection	Ruling
	Lacks foundation and personal knowledge; speculative. Evid. Code §§ 403, 702(a) and 800. Declarant fails to lay proper foundation or establish personal knowledge of CVWD's hypothetical effects of non-participation and future operation of the DYY Program. The testimony also consists of speculation as to the above. Improper Opinion. Evid. Code §§ 800–804. Declarant's testimony consists of inadmissible opinions, including without limitation, regarding CVWD's hypothetical non-compliance, the future operation of the DYY Program, and effects of compliance with the Opinion.	
19. Declaration of Amanda Coker, ¶ 21, page 8, lines 17–20; Ex. D: “On February 26, 2026, the City of Chino, City of Upland, City of Chino Hills, Jurupa Community Services District, City of Pomona, and Monte Vista Water District sent a letter to IEUA requesting assistance in meeting their minimum production baselines under the DYY Program. A true and correct copy of that letter is attached hereto as Exhibit D.”	Irrelevant. Evid. Code §§ 210, 350. The future operation of the DYY Program is irrelevant to Ontario's opposition to Watermaster's motion, the issues in the supplemental briefing, and Ontario's effort to enforce the Court Appeal's Opinion directing Watermaster to correct and amend the FY 2021/2022 and 2022/2023 Assessment Packages consistent with the original DYY Program agreements, the Judgment, and prior court orders. In its Opinion, the Court of Appeal found that Watermaster's interpretation and application of the 2019 Letter Agreement to approve the Assessment	Sustained: ____ Overruled: ____

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Material Objected To	Grounds for Objection	Ruling
	Packages “violated the Judgment and the agreements that created the DYY Program” and the 2019 Letter Agreement is not court approved or one of the original DYY Program agreements, and therefore, the produced water in the corrected assessment packages cannot be designated as DYY water. Exhibit D is irrelevant for these same reasons and should be stricken. Lacks foundation and personal knowledge; speculative. Evid. Code §§ 403, 702(a) and 800. Declarant fails to lay proper foundation or establish personal knowledge of CVWD’s hypothetical effects of non-participation and future operation of the DYY Program. The testimony also consists of speculation as to the above. Improper Opinion. Evid. Code §§ 800–804. Declarant’s testimony consists of inadmissible opinions, including without limitation, regarding CVWD’s hypothetical non-compliance, future operation of the DYY Program, and effects of compliance with the Opinion.	
20. Declaration of Amanda Coker, ¶ 22, page 8, lines 21–24; Ex. E: “On February 4, 2026, the City of Ontario sent a letter to IEUA regarding Dry Year Yield	Irrelevant. Evid. Code §§ 210, 350. The future operation of the DYY Program is irrelevant to Ontario’s opposition to Watermaster’s motion, the issues in the supplemental	Sustained: ____ Overruled: ____

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Material Objected To	Grounds for Objection	Ruling
Operating Changed Conditions and Variance, where Ontario requested that its performance baseline be reduced due to its inability to meet the Exhibit G performance criteria required under the DYY Program. A true and correct copy of this letter is attached hereto as Exhibit E."	briefing, and Ontario's effort to enforce the Court Appeal's Opinion directing Watermaster to correct and amend the FY 2021/2022 and 2022/2023 Assessment Packages consistent with the original DYY Program agreements, the Judgment, and prior court orders. In its Opinion, the Court of Appeal found that Watermaster's interpretation and application of the 2019 Letter Agreement to approve the Assessment Packages "violated the Judgment and the agreements that created the DYY Program" and the 2019 Letter Agreement is not court approved or one of the original DYY Program agreements, and therefore, the produced water in the corrected assessment packages cannot be designated as DYY water. Exhibit E is irrelevant for these same reasons and should be stricken. Lacks foundation and personal knowledge; speculative. Evid. Code §§ 403, 702(a) and 800. Declarant fails to lay proper foundation or establish personal knowledge of CVWD's hypothetical effects of non-participation and future operation of the DYY Program. The testimony also consists of speculation as to the above.	

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4 **CORRECTED AND AMENDED FISCAL YEARS 2021/2022 AND 2022/2023**
5 **ASSESSMENT PACKAGES AND OPPOSITION TO THE CITY OF ONTARIO'S**
6 **CHALLENGE TO WATERMASTER'S APPROVAL OF THE CORRECTED AND**
7 **AMENDED FISCAL YEARS 2021/22 AND 2022/23 ASSESSMENT PACKAGES**

Material Objected To	Grounds for Objection	Ruling
	Improper Opinion. Evid. Code §§ 800-804. Declarant's testimony consists of inadmissible opinions, including without limitation, regarding CVWD's hypothetical non-compliance, future operation of the DYY Program, and effects of compliance with the Opinion.	

11
12 Dated: August 3, 2026

STOEL RIVES LLP

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14 By: 
15 ELIZABETH P. EWENS
16 MICHAEL B. BROWN

17 Attorneys for
18 City of Ontario
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CHINO BASIN WATERMASTER

Case No. RCVRS 51010

Chino Basin Municipal Water District v. City of Chino, et al.

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 action within. My business address is Chino Basin Watermaster, 9641 San Bernardino Road, Rancho Cucamonga, California 91730; telephone (909) 484-3888.

On August 3, 2026, I served the following:

1. CITY OF ONTARIO'S EVIDENTIARY OBJECTIONS TO DECLARATION OF AMANDA COKER IN SUPPORT OF CUCAMONGA VALLEY WATER DISTRICT'S SUPPLEMENTAL BRIEF IN SUPPORT OF WATERMASTER'S MOTION FOR COURT APPROVAL OF CORRECTED AND AMENDED FISCAL YEARS 2021/22 AND 2022/23 ASSESSMENT PACKAGES AND OPPOSITION TO THE CITY OF ONTARIO'S CHALLENGE TO WATERMASTER'S APPROVAL OF THE CORRECTED AND AMENDED FISCAL YEARS 2021/22 AND 2022/23 ASSESSMENT PACKAGES

/ X / BY MAIL: in said cause, by placing a true copy thereof enclosed with postage thereon fully prepaid, for delivery by the 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.

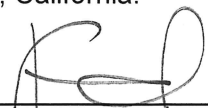
/ ___ / BY FACSIMILE: I transmitted said document by fax transmission from (909) 484-3890 to the fax number(s) indicated. The transmission was reported as complete on the transmission report, which was properly issued by the transmitting fax machine.

/ 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.

See attached service list: Master Email Distribution List

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

Executed on August 3, 2026, in Rancho Cucamonga, California.



By: Kirk Richard C. Dolar
Chino Basin Watermaster

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