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9 INDIAN WELLS VALLEY GROUNDWATER
AUTHORITY

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11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **COUNTY OF ORANGE, CIVIL COMPLEX CENTER**
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14 MOJAVE PISTACHIOS, LLC, et al.,
15 Plaintiff and Petitioner,
16 v.
17 INDIAN WELLS VALLEY
GROUNDWATER AUTHORITY, et al.,
18 Defendants and Respondents.

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20 _____
21 SEARLES MINERALS INC.,
22 Plaintiff and Petitioner,
23 v.
24 INDIAN WELLS VALLEY
GROUNDWATER AUTHORITY, et al.,
25 Defendants and Respondents.

Case No. 30-2021-01187589-CU-WM-CXC
(Consolidated with Case No. 30-2021-
011880890-CU-WM-CXC; Related Case Nos.
30-2021-01187275-CU-OR-CJC)

**DECLARATION OF KEITH LEMIEUX IN
SUPPORT OF INDIAN WELLS VALLEY
GROUNDWATER AUTHORITY'S
SUPPLEMENTAL BRIEF IN OPPOSITION
TO INDIAN WELLS VALLEY WATER
DISTRICT'S MOTION FOR ORDER RE
"INTERESTED PARTY" STATUS, OR, IN
THE ALTERNATIVE, LEAVE TO AMEND
ANSWER**

Date: February 6, 2026
Time: 11:00 a.m.
Dept.: CX101

Complaint Filed: September 30, 2020
Dismissal Filed: November 17, 2025

Hon. William D. Cluster

[Exempt from filing fees pursuant to Govt. Code § 6103]

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8 AUTHORITY and BOARD OF DIRECTORS
OF THE INDIAN WELLS VALLEY
9 GROUNDWATER AUTHORITY

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DECLARATION OF W. KEITH LEMIEUX

I, W. Keith Lemieux, declare as follows:

1. I am an attorney at law duly licensed to practice before all of the courts in the State of California. I am general counsel to the Indian Wells Valley Groundwater Authority (“Authority”). As general counsel my responsibilities include providing general legal services to the Authority including the attendance of public and closed session meetings. I make this declaration in support of the Authority’s Supplemental Brief in support of the Authority’s opposition to Defendant and Respondent Indian Wells Valley Water District (“District”) motion for order regarding “interested party” status, or, alternatively, for leave to file an amended answer (“Motion”). I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. On November 13, 2025, the Authority and Plaintiff and Petitioner Searles Valley Minerals Inc. (“Searles”) entered into a settlement agreement to dismiss this action as well as *Indian Wells Valley Groundwater Authority v. Searles Valley Minerals Inc.*, OCSC Case No. 30-2022-01239487 (“Injunction Action”), and *Searles Valley Minerals Inc. v. Indian Wells Valley Groundwater Authority*, OCSC Case No. 30-2025-01457804 (“PRA Action”). The settlement discussions occurred during the entirety of 2025 and dismissals were entered, with prejudice, in the Injunction Action and the PRA Action. The Authority and Searles entered into the settlement agreement with the understanding that this Court would dismiss this action in its entirety.

3. In addition to resolving the pending litigation, the settlement agreement was a significant step toward managing the Indian Wells Valley Groundwater Basin (“Basin”) and resolving the comprehensive adjudication. Under the settlement agreement, the Authority agreed to terminate its option agreement to purchase reclaimed water from the City of Ridgecrest in order to make approximately 2,000 acre-feet (“af”) of reclaimed water available to Searles. Searles is also entitled to purchase and receive imported water through the pipeline project being funded by the Replenishment Fee, thereby significantly reducing 2,000 af of demand on the critically overdrafted Basin with a sustainable yield of 7,650 af.

4. Attached as **Exhibit F** are true and correct copies of excepted pages of the court

1 reporter’s certified transcript of the November 21, 2025 hearing on the District’s Motion.

2 I declare under penalty of perjury under the laws of the state of California that the foregoing is
3 true and correct to the best of my knowledge.

4 Executed on this 12th day of January, 2026, at Westlake Village, California.

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8 W. Keith Lemieux
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EXHIBIT F

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE
COMPLEX JUSTICE CENTER - DEPARTMENT CX101

MOJAVE PISTACHIOS LLC,)
)
 Plaintiff,)
)
 vs.) No. 30-2021-01187589-
) CU-WM-CXC
 INDIAN WELLS VALLEY)
 GROUNDWATER AUTHORITY,)
)
 Defendant.)
 _____)

THE HONORABLE WILLIAM D. CLASTER, JUDGE PRESIDING

REPORTER'S TRANSCRIPT

FRIDAY, NOVEMBER 21, 2025

REPORTED BY: Stacie Skotarczyk, CSR No. 7211
Official Court Reporter Pro Tempore

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1 ANOTHER PARTY, YOU KNOW, I COULD SPECULATE. BUT I WANT
2 TO MAKE VERY CLEAR THAT WHAT YOU HAD SUGGESTED, OR NOT
3 SUGGESTED, I'M SORRY, THAT'S NOT CORRECT. WHAT YOU
4 QUESTIONED ABOUT, THAT DID NOT HAPPEN. WE DID NOT, YOU
5 KNOW, ENGAGE IN SOME KIND OF A PLAN HERE TO LULL THE -- I
6 MEAN, WE ARE HERE TO --

7 THE COURT: LET ME PHRASE IT DIFFERENTLY.

8 MR. DUNN: YES.

9 THE COURT: DID IT EVER COME UP IN ANY OF THE
10 DISCUSSIONS BETWEEN THE PARTIES, I'M TALKING ABOUT
11 BETWEEN SEARLES AND THE AUTHORITY, THAT WE HAVE THIS
12 LINGERING DISTRICT INTERESTED PARTY ACTION OUT THERE?
13 DID IT EVER COME UP ONE WAY OR THE OTHER?

14 MR. EVERTZ: YOUR HONOR, CAN I JUMP IN BEFORE
15 MR. DUNN RESPONDS ON THIS ISSUE?

16 THE COURT: SURE.

17 MR. EVERTZ: AT OUR LAST STATUS CONFERENCE HERE
18 BEFORE THE COURT, I DON'T RECALL THE DATE, BUT WE WERE
19 DISCUSSING ALL THE CASES. AND THE COURT INQUIRED ABOUT
20 THE STATUS OF THE SETTLEMENT BETWEEN SEARLES AND THE
21 AUTHORITY. AND THIS IS WAY BEFORE ANY AGREEMENT WAS
22 SIGNED, TO MY KNOWLEDGE.

23 I SPECIFICALLY ADVISED THE COURT AND ALL THE
24 PARTIES THAT THE DISTRICT WAS TAKING THE POSITION THAT IT
25 COULD CONTINUE TO LITIGATE THE CASE REGARDLESS OF WHAT
26 OCCURRED BETWEEN SEARLES AND THE AUTHORITY.

1 SO YES, IT WAS OUT THERE. AND AS TO
2 MR. LEMIEUX'S REFERENCE TO CCP 581, THAT'S NOT A
3 VALIDATION PROCEEDING, AND IT DOESN'T DEAL WITH
4 VALIDATION STATUTES.

5 THE COURT: HOLD ON ONE SECOND. OKAY. ALL
6 RIGHT.

7 I DON'T HAVE THAT SPECIFICALLY WRITTEN DOWN BUT
8 I'LL TAKE YOUR WORD FOR IT.

9 MR. EVERTZ: THANK YOU.

10 MR. DUNN: DID I ANSWER YOUR QUESTION, YOUR
11 HONOR? I THINK YOUR QUESTION IS, YOU KNOW, LEADING UP TO
12 THE SIGNING OF THE SETTLEMENT AGREEMENT, WERE THERE ANY
13 DISCUSSIONS SAY BETWEEN SEARLES AND THE GROUNDWATER
14 AUTHORITY ABOUT WHAT MIGHT HAPPEN?

15 THE COURT: YES. THAT WAS THE QUESTION.

16 MR. DUNN: OKAY.

17 THE COURT: WELL, NOT ONLY WHAT MIGHT HAPPEN BUT
18 THAT THE DISTRICT WAS HANGING OUT THERE, STILL IN THIS
19 REVERSE VALIDATION ACTION.

20 MR. DUNN: NO. I DON'T THINK THERE WAS ANY
21 DISCUSSION THAT -- WELL, I'M TRYING TO WORK FROM MEMORY
22 HERE. I THINK WHAT I CAN SAY TO YOU IS, TO USE YOUR
23 LANGUAGE, IS THERE WAS DISCUSSION THAT THE DISTRICT WOULD
24 STILL BE HANGING OUT THERE. BUT NOT NECESSARILY --

25 THE COURT: WHEN WAS THE CASE SETTLED IN
26 PRINCIPLE? I'M NOT TALKING ABOUT THE FORMALITY OF THE

1 FINAL AGREEMENT. BY MONTH, GIVE ME A MONTH.

2 MR. DUNN: MR. LEMIEUX, MAYBE YOU CAN HELP ME
3 OUT WITH THAT. BECAUSE --

4 MR. LEMIEUX: WELL, YOUR HONOR, WE WERE
5 DISCUSSING SETTLEMENT AND WORKING ON THIS THROUGHOUT THE
6 ENTIRETY OF 2025.

7 MR. DUNN: YES.

8 MR. LEMIEUX: THERE ARE A LOT OF PIECES TO THE
9 SETTLEMENT. IT ISN'T SIMPLY ABOUT DISMISSING THE CASES.
10 IT WAS NOT THAT SIMPLE. WE'RE, PART OF IT IS FIGURING
11 OUT A WAY TO GET SEARLES WATER THAT'S NOT DEPENDENT ON
12 THE NATIVE GROUNDWATER OF THE BASINS. AND THAT REQUIRED
13 SOME TECHNICAL ANALYSIS ON THE PART OF SEARLES TO MAKE
14 SURE THAT THEY COULD TAKE RECYCLED WATER FROM THE
15 DISTRICT'S TREATMENT PLANT.

16 SO THIS HAS BEEN WELL AND TRULY IN THE WORKS I
17 THINK SINCE LAST NOVEMBER. AND SO WELL BEFORE -- AND TO
18 BE HONEST WITH YOU, YOUR HONOR, I THINK WHAT MUST HAVE
19 HAPPENED IS THAT THE WATER DISTRICT MUST HAVE SNIFFED OUT
20 THAT THE CASE WAS GOING AWAY AND THEN EVENTUALLY TRIED TO
21 FILE THIS ACTION.

22 BUT WE WERE RELYING ON THE CASE LAW THAT I THINK
23 IS VERY CLEAR, THAT THERE IS ONLY ONE PLAINTIFF IN THIS
24 CASE, AND THERE WAS ONLY ONE PARTY ASKING FOR RELIEF.
25 AND WHEN THAT PARTY WHO IS ASKING FOR RELIEF FILES A
26 DISMISSAL REQUEST, IT'S A MINISTERIAL ACT AT THAT POINT

1 TO ENTER THE DISMISSAL REQUEST.

2 AND THAT'S WHAT I THINK WHAT JEFF -- SORRY,
3 MR. DUNN, I MEAN, CORRECT ME IF I'M WRONG, BUT YOU KNOW,
4 THAT'S WHAT WE WERE RELYING ON WHEN WE MOVED FORWARD AND
5 WE EXECUTED THE AGREEMENT AND WE FILED THE DISMISSAL
6 REQUEST.

7 THE COURT: THE REASON I ASKED THE QUESTION,
8 THOUGH, IS BECAUSE ON AUGUST 19TH OF THIS YEAR THERE WAS
9 A STIPULATION TO CONTINUE THE TRIAL FROM OCTOBER 13TH TO
10 FEBRUARY 4TH. SO -- AND THE DISTRICT WAS A PARTY TO THAT
11 STIPULATION. SO THAT WOULD SUGGEST THAT AT LEAST AT THAT
12 POINT THE CASE HAD NOT BEEN SETTLED.

13 MR. EVERTZ: YOUR HONOR, THE DATES ARE IN MY
14 DECLARATION, BUT I HAD A CONVERSATION WITH MR. DUNN AND
15 MR. BROCHARD REGARDING THE PREPARATION OF THE RECORD FOR
16 THIS VALIDATION CASE, I BELIEVE SOMETIME IN AUGUST.

17 AND AT THAT TIME I DID ADVISE MR. BROCHARD THAT
18 THE DISTRICT INTENDED TO PROSECUTE THE CASE. AND THAT'S
19 WHEN WE REALIZED WE HAD DIFFERENCES OF OPINION, WHICH
20 PROMPTED THIS MOTION. SO THIS GOES BACK TO OVER THE
21 SUMMER.

22 MR. EVERTZ: AND YOUR HONOR, JUST REAL QUICK, IN
23 PREVIOUS STATUS CONFERENCES LEADING UP TO TODAY, I THINK
24 YOU DID INQUIRE FROM TIME TO TIME ABOUT SETTLEMENT. AND
25 I CLEARLY RECALL SAYING THAT WE'RE TALKING. I THINK
26 THAT --

1 HERE TODAY TO DEFEND HIMSELF, BUT AS I UNDERSTAND, THE
2 RECORD IS LARGELY COMPLETE WITH THE EXCEPTION OF
3 TRANSCRIPTIONS IS OF THE PUBLIC HEARINGS ON THE GSP. AND
4 THE DISCUSSIONS WE WERE HAVING AT THE TIME WAS WHETHER WE
5 NEED TO HAVE A COURT REPORTER TRANSCRIBE THOSE VERSUS AN
6 AI MODEL OF SOME TYPE.

7 AS I UNDERSTAND IT, THE RECORD IS LARGELY
8 COMPLETE WITH THE EXCEPTION OF THOSE TRANSCRIPTS. UPON
9 COMPLETION OF THAT RECORD, IT WILL BE BRIEFED. WE CAN
10 HAVE THAT ON FILE 30 DAYS THEREAFTER. SO THERE IS LITTLE
11 TO BE DONE TO ACTUALLY QUOTE, UNQUOTE TRY THIS CASE.
12 IT'S MORE OF A HEARING, I WOULD PROPOSE. AND THAT WAS
13 TEED UP AND READY TO GO.

14 SO THERE IS NO NEW DISCOVERY. THERE IS NO -- WE
15 MIGHT WANT TO PUSH THE DATE, THE FEBRUARY DATE, A BIT BUT
16 NOT MUCH. BUT THERE IS NO NEW PLEADINGS, NO PRETRIAL
17 MOTIONS, NO MOTIONS IN LIMINE, NOTHING LIKE THAT.

18 MR. DUNN: YOUR HONOR, MAY I ADDRESS THE COURT
19 ON THIS?

20 THE COURT: SURE.

21 MR. DUNN: JUST TO MAKES THINGS VERY CLEAR, OUR
22 UNDERSTANDING AT THE TIME, BOTH BEFORE AND WHEN WE
23 ENTERED INTO THIS SETTLEMENT AGREEMENT, WE ARE TALKING
24 SEARLES, IS THAT WE WOULD DISMISS OUR ACTION AND THAT
25 ACTION WOULD GO AWAY. THAT WAS OUR UNDERSTANDING; THAT
26 WAS OUR INTENTION.

1 I DON'T WANT TO LEAVE ANY AMBIGUITY ON THE
2 RECORD THAT THERE HAS BEEN ANY THINKING OTHERWISE. THERE
3 HAS BEEN SOME THINKING ON OUR PART THAT WE WOULD NOT
4 NECESSARILY KNOW OR BE ABLE TO CONTROL HOW OTHER PARTIES,
5 INCLUDING THE DISTRICT, MIGHT RESPOND TO THAT. BUT I
6 WANT TO BE VERY CLEAR THAT OUR AGREEMENT WAS THAT WE
7 WOULD FILE THAT REQUEST FOR DISMISSAL. AND OUR
8 UNDERSTANDING WAS THAT BY DOING SO, OUR CASE WOULD GO
9 AWAY. SO I WANT TO MAKE THAT CLEAR.

10 MR. LEMIEUX: YOUR HONOR, AND WANT TO ECHO
11 MR. DUNN. THAT WAS ABSOLUTELY THE THINKING ON BOTH OUR
12 PARTS WHEN WE MOVED FORWARD WITH THE SETTLEMENT.

13 THE COURT: OKAY. LET ME PIVOT BACK A MOMENT TO
14 MR. EVERTZ. I'M STILL TRYING TO UNDERSTAND THIS, THE
15 POINT OF TRYING TO INVALIDATE THE GSP. IT SOUNDS LIKE
16 THE POINT IS LESS ABOUT THERE BEING SOME SORT OF
17 COLLATERAL ESTOPPEL LIKE EFFECT ON THE FINDINGS IN
18 SUPPORT OF THE GSP, AND MORE ABOUT STOPPING THE AUTHORITY
19 FROM GOING FORWARD ON IMPLEMENTATION PLANS THAT ARE GOING
20 TO COST A LOT OF MONEY, INCLUDING COSTING THE DISTRICT
21 ADDITIONAL MONEY.

22 IS THAT REALLY WHAT THIS IS ABOUT?

23 MR. EVERTZ: WELL, YES, YOUR HONOR. AND AGAIN,
24 IF YOU WILL INDULGE ME, I WILL LET YOU KNOW A LITTLE BIT
25 MORE WHAT IS GOING ON BEHIND THE CURTAIN.

26 YOU'LL RECALL SOME TIME AGO, WHEN WE WERE TRYING

1 STATE OF CALIFORNIA.)
2 COUNTY OF ORANGE) SS.

3
4 REPORTER'S CERTIFICATE

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6
7 I, STACIE SKOTARCZYK, CSR NO. 7211, COURT
8 REPORTER, DO HEREBY CERTIFY THAT THE WITHIN AND
9 FOREGOING REPORTER'S TRANSCRIPT IS A FULL, TRUE AND
10 CORRECT TRANSCRIPTION OF MY SHORTHAND NOTES THEREOF, AND
11 A FULL, TRUE AND CORRECT STATEMENT OF THE PROCEEDINGS
12 HAD IN SAID CAUSE.

13 DATED AT VISTA, CALIFORNIA, THIS 23RD DAY OF
14 NOVEMBER, 2025.

15 

16 _____
17 STACIE SKOTARCZYK, CSR NO. 7211
18 COURT REPORTER PRO TEMPORE

PROOF OF SERVICE

Mojave Pistachios, LLC; et al. v. Indian Wells Valley Groundwater Authority; et al.
Searles Valley Minerals Inc. v. Indian Wells Valley Groundwater Authority; et al.
Court of Appeal, Fourth Appellate District, Division 3, Case No. G062327
Orange County Superior Court - Civil Complex Center
Lead Case No. 30-2021-01187589-CU-WM-CXC
Consolidated with Case No. 30-2021-01188089-CU-WM-CXC
Related to Case No. 30-2021-01187275-CU-OR-CJC
The Honorable William Claster, Dept. CX104

I, Marcella Correa, declare:

I am a resident of the State of California and over the age of eighteen years and not a party to the within action. My business address is 1 Civic Center Circle, P.O. Box 1059, Brea, California 92822. My email address is mcorra@rwglaw.com. On January 12, 2026, I served the within document(s) described as:

DECLARATION OF KEITH LEMIEUX IN SUPPORT OF INDIAN WELLS VALLEY GROUNDWATER AUTHORITY'S SUPPLEMENTAL BRIEF IN OPPOSITION TO INDIAN WELLS VALLEY WATER DISTRICT'S MOTION FOR ORDER RE "INTERESTED PARTY" STATUS, OR, IN THE ALTERNATIVE, LEAVE TO AMEND ANSWER

on the interested parties in this action as stated on the attached service list.

(BY E-MAIL) By transmitting a true copy of the foregoing document(s) to the e-mail addresses set forth above.

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

Executed on January 12, 2026, at San Dimas, California.



Marcella Correa

SERVICE LIST

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