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12 Attorneys for Plaintiff United States of America

13 IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA
14 SACRAMENTO DIVISION

15 _____)
16 THE UNITED STATES OF AMERICA,)
17 Plaintiff,)
18 v.)
19 H.C. ANGLE, et al.,)
20 Defendants.)
21 _____)

Civil No. S-80-583-LKK [In Equity No. 30]

DECLARATION OF CHARLES R.
SHOCKEY IN SUPPORT OF
PLAINTIFF'S REPLY MEMORANDUM
FOR MOTION TO AMEND ANGLE
DECREE AND RESPONSE TO
DEFENDANT BARKLEY'S
COUNTER-MOTION TO SET ASIDE

DATE: February 9, 2009
TIME: 10:00 a.m.
COURT: Courtroom 4, 15th Floor

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27 DECLARATION OF CHARLES R. SHOCKEY iso
PLAINTIFF'S REPLY MEMORANDUM FOR MOTION
TO AMEND ANGLE DECREE AND RESPONSE TO
28 DEFENDANT BARKLEY'S COUNTER-MOTION
TO SET ASIDE DECREE

Civil No. S-80-583-LKK

1 I, Charles R. Shockey, submit the following statement pursuant to and in accordance with
2 28 U.S.C. § 1746.

3 1. I am one of the attorneys of record assigned to represent the plaintiff United States
4 of America in this action. I submit this declaration in support of the Plaintiff's
5 Reply Memorandum in Support of Motion to Amend Angle Decree and Response
6 to Defendant Barkley's Counter-Motion to Set aside Angle Decree. I have
7 personal knowledge of the facts stated herein. I am over 21 years of age, of sound
8 mind, and competent to testify in this matter. If called upon to testify, I would
9 testify that the facts set forth in this Declaration are true and correct.

10 2. I attach as Exhibit 1 a true and correct copy of the Sacramento Valley Integrated
11 Regional Water Management Plan (December 2006), prepared by Northern
12 California Water Association, with the cover page, table of contents, first page,
13 and pages 5-12 and 5-13, which are cited by Defendant Barkley in his Opposition
14 and Counter-Motion.

15 3. I attach as Exhibit 2 a true and correct copy of a 2003 presentation of slides titled
16 "Are We No Better Off in California," prepared by Rick Massa, Manager, Orland
17 Unit Water Users' Association, which is cited by Defendant Barkley in his
18 Opposition and Counter-Motion.

19 4. I attach as Exhibit 3 a true and correct copy an electronic mail exchange posted on
20 a website for the Orland Unit Water Users' Association, dated June 21, 2008,
21 [<http://local.yahoo.com/info-21806926>] cited by Defendant Barkley in his
22 Opposition and Counter-Motion.

23 5. I attach as Exhibit 4 a true and correct copy of Part Two of a document titled
24 "Development of Conveyance Alternatives for TCCA Emergency Water
25 Supplies," a Project of the Sacramento Valley Water Management Agreement,
26

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Civil No. S-80-583-LKK

1 prepared for California Department of Water Resources Water Use Efficiency
2 Program, dated March 1, 2002, and cited by Defendant Barkley in his Opposition
3 and Counter-Motion.

4 6. I attach as Exhibit 5 a true and correct copy of an electronic mail message sent
5 from Mr. George Kokkinakis to me, as counsel for the United States, dated
6 October 22, 2008, subject: "Motion to Amend Angle Decree - comments."

7 7. I attach as Exhibit 6 a true and correct copy of the Declaration of George G.
8 Wilson, the court-appointed Water Master for Stony Creek and its tributaries,
9 dated May 19, 1992, and filed in United States v. Angle, Case No. In Equity No.
10 30 LKK (E.D.Cal.).

11 8. I attach as Exhibit 7 a true and correct copy of a newspaper article written by Chal
12 Green and published in 1977 in the Enterprise-Record titled "Glenn Supervisors
13 Support Plan," which was provided to me by representatives of the Orland Unit
14 Water Users' Association.

15 I declare under penalty of perjury under the laws of the United States of America that the
16 following is true and correct.

17 Executed this 22nd day of December, 2008, at Sacramento, California.

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/s/ Charles R. Shockey

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Charles R. Shockey

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