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10 ANTELOPE VALLEY UNITED MUTUAL GROUP
11 and Cross-Defendants, ADAMS BENNETT
12 INVESTMENTS, LLC, MIRACLE IMPROVEMENT
13 CORPORATION dba GOLDEN SANDS MOBILE
14 HOME PARK aka GOLDEN SANDS TRAILER
15 PARK [ROE 1121], SERVICE ROCK PRODUCTS,
16 L.P., SHEEP CREEK WATER COMPANY, INC. and
17 ST. ANDREW'S ABBEY, INC. [ROE 623]

18 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
19 **IN AND FOR THE COUNTY OF LOS ANGELES**

20 Coordination Proceeding
21 Special Title (Rule 1550(b))

) Judicial Council Coordination
) Proceeding No. 4408

22 **ANTELOPE VALLEY GROUNDWATER**
23 **CASES**

) Santa Clara Case No. 1-05-CV-049053
) Assigned to the Honorable Jack Komar
) Department 17C

24 Including Actions:

25 Los Angeles County Waterworks District No.
26 40 v. Diamond Farming Co.
27 Superior Court of California, County of Los
28 Angeles, Case No. BC 325 201

) **CASE MANAGEMENT / STATUS**
) **CONFERENCE STATEMENT BY ADAMS**
) **BENNETT INVESTMENTS, LLC,**
) **ANTELOPE VALLEY UNITED MUTUAL**
) **GROUP, MIRACLE IMPROVEMENT**
) **CORPORATION dba GOLDEN SANDS**
) **MOBILE HOME PARK, aka GOLDEN**
) **SANDS TRAILER PARK [ROE 1121],**
) **SERVICE ROCK PRODUCTS, L.P., SHEEP**
) **CREEK WATER COMPANY, INC. AND ST.**
) **ANDREW'S ABBEY, INC. [ROE 623]**

Los Angeles County Waterworks District No.
40 v. Diamond Farming Co.
Superior Court of California, County of Kern,
Case No. S-1500-CV-254-348

Wm. Bolthouse Farms, Inc. v. City of
Lancaster
Diamond Farming Co. v. City of Lancaster
Diamond Farming Co. v. Palmdale Water Dist.
Superior Court of California, County of
Riverside, consolidated actions, Case Nos. RIC
353 840, RIC 344 436, RIC 344 668

) Date: June 19, 2012
) Time: 9:00 A.M.
) Dept: 316 (CCW) – Telephonic Appearance
) Judge: Honorable Jack Komar
) Coordination Trial Judge

AND RELATED ACTIONS.

1 TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

2 Cross-Defendant and Cross-Complainant, ANTELOPE VALLEY UNITED MUTUAL
3 GROUP ("AVUMG") and Cross-Defendants, ADAMS BENNETT INVESTMENTS, LLC
4 ("ADAMS BENNETT"), and MIRACLE IMPROVEMENT CORPORATION dba Golden
5 Sands Mobile Home Park aka Golden Sands Trailer Park [ROE 1121] ("GOLDEN SANDS"),
6 SERVICE ROCK PRODUCTS, L.P. ("SERVICE ROCK"), SHEEP CREEK WATER
7 COMPANY, INC. ("SHEEP CREEK") and ST. ANDREW'S ABBEY, INC. [ROE 623] ("ST.
8 ANDREW'S"), by and through their attorneys of record, Gresham Savage Nolan & Tilden,
9 APC, by Michael Duane Davis, Esq. and Marlene L. Allen-Hammarlund, Esq. hereby submit
10 their Case Management / Status Conference Statement for June 19, 2012.

11 AVUMG, ADAMS BENNETT, GOLDEN SANDS, SHEEP CREEK, SERVICE
12 ROCK and ST. ANDREW'S have actively participated in the proceedings to date, including
13 those conducted before Justice Ronald Robie and at AVEK and elsewhere in the Antelope
14 Valley. Though these mediation and negotiation efforts are certainly not complete, much
15 progress has been made on many major issues, and cause for optimism remains that these efforts
16 will ultimately prove to be fruitful. There are however, a few issues that remain stumbling
17 blocks. These issues, for the most part, are affected by the financial and logistical difficulties
18 associated with the acquisition, storage and distribution of sufficient supplemental water to meet
19 the needs of the parties in light of sound management practices. Finding solutions for these
20 issues will be critical to completing the development of the [draft] Judgment and Physical
21 Solution.

22 Recently, these parties attended a meeting at which representatives of the United States
23 Geological Survey ("USGS") and engineers who represent major parties in this action reported
24 on recent scientific developments and potentialities for improving the conditions in and
25 management of the Antelope Valley Basin. Though the specifics of the presentations are
26 protected by the Mediation Privilege, it is worthwhile mentioning that the parties appear to find
27 themselves on the verge of a historic point where concrete plans for significantly improving the
28 hydrologic conditions in the Basin and managing certain aspects of Basin operations will shortly

1 be able to be developed. In fact, the projections for these scientists being able to report their
2 analyses and findings back to the group, was roughly sixty (60) to ninety (90) days. While it is
3 certainly important that this litigation continue to proceed apace, it is equally important that the
4 parties and this Court take full advantage of these recent advanced in scientific understanding
5 and potentially meritorious Basin management options and plans.

6 These parties respectfully request that this Court allow sufficient time for the promised
7 analyses to be completed and presented to the Parties so that they can utilize that information in
8 completing the development of the [draft] Judgment and Physical Solution.

9 Furthermore, recent filings evidence other problems being faced by the parties who have
10 been actively involved in the mediations and negotiations. These problems also need to be
11 rectified in order for the efforts of the parties to develop a [draft] Judgment and Physical
12 Solution, circulate it amongst the parties for approval, and finally bring it to the Court for
13 adoption, to be completed.

14 Should this Court, however, determine to set the next phase of trial in this action without
15 waiting for that information, these parties respectfully request that the Court conduct the next
16 phase of trial on the issues of Prescription and Return Flows, followed by proving up the Parties'
17 Claimed Rights.

18 DATED: June 18, 2012.

Respectfully submitted,

GRESHAM SAVAGE NOLAN & TIDEN, APC

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21
22 By: 

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and Cross-Defendants, ADAMS BENNETT
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aka Golden Sands Trailer Park [ROE 1121], SERVICE
ROCK PRODUCTS, L.P., SHEEP CREEK WATER
COMPANY, INC. and ST. ANDREW'S ABBEY, INC.
[ROE 623]

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**PROOF OF SERVICE
STATE OF CALIFORNIA, COUNTY OF RIVERSIDE**

Re: *ANTELOPE VALLEY GROUNDWATER CASES*
Los Angeles County Superior Court Judicial Council Coordinated
Proceedings No. 4408; Santa Clara County Superior Court Case No. 1-05-CV-049053

I am employed in the County of Riverside, State of California. I am over the age of 18 years and not a party to the within action; my business address is: 3750 University Avenue, Suite 250, Riverside, CA 92501-3335.

On June 18, 2012, I served the foregoing document(s) described as **CASE MANAGEMENT / STATUS CONFERENCE STATEMENT BY ADAMS BENNETT INVESTMENTS, LLC, ANTELOPE VALLEY UNITED MUTUAL GROUP, MIRACLE IMPROVEMENT CORPORATION dba GOLDEN SANDS MOBILE HOME PARK, aka GOLDEN SANDS TRAILER PARK [ROE 1121], SERVICE ROCK PRODUCTS, L.P., SHEEP CREEK WATER COMPANY, INC. AND ST. ANDREW'S ABBEY, INC. [ROE 623]** on the interested parties in this action in the following manner:

(X) **BY ELECTRONIC SERVICE** – I posted the document(s) listed above to the Santa Clara County Superior Court website, <http://www.scefiling.org>, in the action of the Antelope Valley Groundwater Cases,

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

Executed on June 18, 2012, at Riverside, California.



DINA M. SNIDER