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5 3750 University Avenue, Suite 250
6 Riverside, CA 92501-3335
7 Telephone: (951) 684-2171
8 Facsimile: (951) 684-2150

9
10 Attorneys for Cross-Defendants,
11 Service Rock Products Corporation, as successor-
12 in-interest to Owl Properties, Inc.; Healy
13 Enterprises, Inc., individually and in its capacity
14 as Lessor to Owl Properties, Inc.; and Sheep
15 Creek Water Company, Inc.

16 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
17 **IN AND FOR THE COUNTY OF LOS ANGELES**

12	Coordination Proceeding Special Title (Rule 1550(b)))	Judicial Council Coordination Proceeding No. 4408
13	ANTELOPE VALLEY GROUNDWATER)	Santa Clara Case No. 1-05-CV-049053
14	CASES)	Assigned to the Honorable Jack Komar Department 17
15	Including Actions:)	
16	Los Angeles County Waterworks District No. 40 v. Diamond Farming Co.)	STATEMENT OF SUPPORT BY
17	Superior Court of California, County of Los Angeles, Case No. BC 325 201)	SERVICE ROCK PRODUCTS
18	Los Angeles County Waterworks District No. 40 v. Diamond Farming Co.)	CORPORATION, AS SUCCESSOR-IN-
19	Superior Court of California, County of Kern, Case No. S-1500-CV-254-348)	INTEREST TO OWL PROPERTIES,
20)	INC., HEALY ENTERPRISES, INC.,
21	Wm. Bolthouse Farms, Inc. v. City of Lancaster)	INDIVIDUALLY AND IN ITS
22	Diamond Farming Co. v. City of Lancaster)	CAPACITY AS LESSOR TO OWL
23	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)	PROPERTIES, INC., AND SHEEP
24)	CREEK WATER COMPANY, INC., TO
25	ROSAMOND COMMUNITY SERVICES DISTRICT;)	MOTION FOR APPOINTMENT OF
26	LOS ANGELES COUNTY WATERWORKS DISTRICT NO. 40;)	BILL B. DENDY AS MANDATORY
27	PALMDALE WATER DISTRICT;)	SETTLEMENT CONFERENCE
28	CITY OF LANCASTER;)	REFEREE

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STATEMENT OF SUPPORT BY SERVICE ROCK PRODUCTS CORPORATION, HEALY
ENTERPRISES, INC. AND SHEEP CREEK WATER COMPANY TO MOTION FOR
APPOINTMENT OF BILL B. DENDY AS MANDATORY SETTLEMENT CONFERENCE REFEREE

197088.1

1 CITY OF PALMDALE;
2 LITTLEROCK CREEK IRRIGATION
3 DISTRICT;
4 PALM RANCH IRRIGATION DISTRICT;
5 QUARTZ HILL DISTRICT; and
6 CALIFORNIA WATER SERVICE
7 COMPANY,

8 Cross-Complainants,

9 vs.

10 DIAMOND FARMING COMPANY;
11 WM. BOLTHOUSE FARMS, INC.;
12 BOLTHOUSE PROPERTIES LLC; ABC
13 WILLIAMS ENTERPRISES LP;
14 ACEH CAPITAL LLC;
15 JACQUELINE ACKERMANN;
16 CENON ADVINCULA;
17 OLIVA M. ADVINCULA;
18 MASHALLAH AFSHAR;
19 ANTONIO U. AGUSTINES;
20 AIRTRUST SINGAPORE PRIVATE
21 LIMITED;
22 MARWAN M. ALDAIS;
23 ALLEN ALEVY;
24 ALLEN ALEVY AND ALEVY FAMILY
25 TRUST;
26 GEORGINE J. ARCHER;
27 GEORGINE J. ARCHER AS TRUSTEE FOR
28 THE GEORGINE J. ARCHER TRUST;
A V MATERIALS, INC.;
GUSS A. BARKS, JR.;
PETER G. BARKS;
ILDEFONSO S. BAYANI;
NILDA V. BAYANI;
BIG WEST CORP.;
RANDALL Y. BLAYNEY;
MELODY S. BLOOM;
BOLTHOUSE PROPERTIES, INC.;
DAVID L. BOWERS;
RONALD E. BOWERS;
LEROY DANIEL BRONSTON;
MARILYN BURGESS;
LAVERNE C. BURROUGHS;
LAVERNE C. BURROUGHS, TRUSTEE OF
THE BURROUGHS FAMILY
IRREVOCABLE TRUST DATED
AUGUST 1, 1995; BRUCE BURROWS;
JOHN & B. CALANDRI 2001 TRUST;
CALIFORNIA PORTLAND CEMENT
COMPANY;
CALMAT LAND CO.;

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STATEMENT OF SUPPORT BY SERVICE ROCK PRODUCTS CORPORATION, HEALY
ENTERPRISES, INC. AND SHEEP CREEK WATER COMPANY TO MOTION FOR
APPOINTMENT OF BILL B. DENDY AS MANDATORY SETTLEMENT CONFERENCE REFEREE

197088.1

1 MELINDA E. CAMERON;
2 CASTLE BUTTE DEV CORP.;
3 CATELLUS DEVELOPMENT
4 CORPORATION;
5 BONG S. CHANG;
6 JEANNA Y. CHANG;
7 MOON S. CHANG;
8 JACOB CHETRIT;
9 FRANK S. CHIODO;
10 LEE S. CHIOU;
11 M S CHUNG;
12 CITY OF LOS ANGELES;
13 CAROL K. CLAYPOOL;
14 CLIFFORD N. CLAYPOOL;
15 W. F. CLUNEN, JR.;
16 W. F. CLUNEN, JR., AS TRUSTEE FOR
17 THE P C REV INTER VIVOS TRUST;
18 CONSOLIDATED ROCK PRODUCTS CO.;
19 COUNTY SANITATION DISTRICT NO. 14
20 OF LOS ANGELES COUNTY;
21 COUNTY SANITATION DISTRICT NO. 20
22 OF LOS ANGELES COUNTY;
23 RUTH A. CUMMING;
24 RUTH A. CUMMING, AS TRUSTEE OF
25 THE CUMMING FAMILY TRUST;
26 CATHARINE M. DAVIS;
27 MILTON S. DAVIS;
28 DEL SUR RANCH LLC;
DIAMOND FARMING COMPANY;
SARKIS DJANIBEKYAN;
HONG DONG;
YING X. DONG;
DOROTHY DREIER;
GEORGE E. DREIER;
EDWARDS AIR FORCE BASE, CA;
MORTEZA M. FOROUGH;
MORTEZA M. FOROUGH, AS TRUSTEE
OF THE FOROUGH FAMILY TRUST;
LEWIS FREDRICHSEN;
LEWIS FREDRICHSEN, AS TRUSTEE OF
THE FREDRICHSEN FAMILY TRUST;
JOAN A. FUNK;
EUGENE GABRYCH;
MARIAN GABRYCH;
AURORA P. GABUYA;
RODRIGO L. GABUYA;
GGF LLC;
GENUS LP;
BETTY GLUCKSTEIN;
JOSEPH H. GLUCKSTEIN;
FORREST G. GODDE;
FORREST G. GODDE, AS TRUSTEE OF
THE FORREST G. GODDE TRUST;

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STATEMENT OF SUPPORT BY SERVICE ROCK PRODUCTS CORPORATION, HEALY
ENTERPRISES, INC. AND SHEEP CREEK WATER COMPANY TO MOTION FOR
APPOINTMENT OF BILL B. DENDY AS MANDATORY SETTLEMENT CONFERENCE REFEREE

197088.1

1 LAWRENCE A. GODDE;
2 LAWRENCE A. GODDE AND GODDE
3 TRUST;
4 MARIA B. GORRINDO;
5 MARIA B. GORRINDO, AS TRUSTEE FOR
6 THE M. GORRINDO TRUST;
7 WENDELL G. HANKS;
8 ANDREAS HAUKE;
9 MARILYN HAUKE;
10 HEALY ENTERPRISES, INC.;
11 WALTER E. HELMICK;
12 DONNA L. HIGELMIRE;
13 MICHAEL N. HIGELMIRE;
14 DAVIS L. AND DIANA D. HINES FAMILY
15 TRUST;
16 HOOSHPACK DEV INC.;
17 CHI S. HUANG;
18 SUCHU T. HUANG;
19 JOHN HUI;
20 HYPERICUM INTERESTS LLC;
21 DARYUSH IRANINEZHAD;
22 MINOO IRANINEZHAD;
23 ESFANDIAR KADIVAR;
24 ESFANDIAR KADIVAR, AS TRUSTEE OF
25 THE KADIVAR FAMILY TRUST;
26 A. DAVID KAGON;
27 A. DAVID KAGON, AS TRUSTEE FOR THE
28 KAGON TRUST;
JACK D. KAHLO;
CHENG LIN KANG;
HERBERT KATZ;
HERBERT KATZ, AS TRUSTEE FOR THE
KATZ FAMILY TRUST;
MARIANNE KATZ;
LILIAN S. KAUFMAN;
LILIAN S. KAUFMAN, AS TRUSTEE FOR
THE KAUFMAN FAMILY TRUST;
KAZUKO YOSHIMATSU;
BARBARA L. KEYS;
BARBARA L. KEYS, AS TRUSTEE OF THE
BARBARA L. KEYS FAMILY TRUST;
BILL H. KIM;
ILLY KING;
ILLY KING, AS TRUSTEE OF THE ILLY
KING FAMILY TRUST;
KOOTENAI PROPERTIES, INC.;
KUTU INVESTMENT CO.;
GAILEN KYLE;
GAILEN KYLE, AS TRUSTEE OF THE
KYLE TRUST;
JAMES W. KYLE;
JAMES W. KYLE, AS TRUSTEE OF THE
KYLE FAMILY TRUST;

STATEMENT OF SUPPORT BY SERVICE ROCK PRODUCTS CORPORATION, HEALY
ENTERPRISES, INC. AND SHEEP CREEK WATER COMPANY TO MOTION FOR
APPOINTMENT OF BILL B. DENDY AS MANDATORY SETTLEMENT CONFERENCE REFEREE

1 JULIA KYLE;
WANDA E. KYLE;
2 FARES A. LAHOUD;
EVA LAI;
3 PAUL LAI;
YING WAH;
4 LAND BUSINESS CORPORATION;
RICHARD E. LANDFIELD;
5 RICHARD E. LANDFIELD, AS TRUSTEE
OF THE RICHARD E. LANDFIELD TRUST;
6 LAWRENCE CHARLES TRUST;
WILLIAM LEWIS;
7 MARY LEWIS;
PEI CHI LIN;
8 MAN C. LO;
SHIUNG RU LO;
9 LYMAN C. MILES;
LYMAN C. MILES, AS TRUSTEE FOR THE
10 MILES FAMILY TRUST;
MALLOY FAMILY PARTNERS LP;
11 MISSION BELL RANCH DEVELOPMENT;
BARRY S. MUNZ;
12 KATHLEEN M. MUNZ;
TERRY A. MUNZ;
13 M. R. NASIR;
SOUAD R. NASIR;
14 EUGENE B. NEBEKER;
SIMIN C. NEMAN;
15 HENRY NGO;
FRANK T. NGUYEN;
16 JUANITA R. NICHOLS;
OLIVER NICHOLS;
17 OLIVER NICHOLS, AS TRUSTEE OF THE
NICHOLS FAMILY TRUST;
18 OWL PROPERTIES, INC.;
PALMDALE HILLS PROPERTY LLC;
19 NORMAN L. POULSEN;
MARILYN J. PREWOZNIK;
20 MARILYN J. PREWOZNIK, AS TRUSTEE
OF THE MARILYN J. PREWOZNIK TRUST;
21 ELIAS QARMOUT;
VICTORIA RAHIMI;
22 R AND M RANCH, INC.;
PATRICIA A. RECHT;
23 VERONIKA REINELT;
REINELT ROSENLOECHER CORP. PSP;
24 PATRICIA J. RIGGINS;
PATRICIA J. RIGGINS, AS TRUSTEE OF
25 THE RIGGINS FAMILY TRUST;
EDGAR C. RITTER;
26 PAULA E. RITTER;
PAULA E. RITTER, AS TRUSTEE OF THE
27 RITTER FAMILY TRUST;

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STATEMENT OF SUPPORT BY SERVICE ROCK PRODUCTS CORPORATION, HEALY
ENTERPRISES, INC. AND SHEEP CREEK WATER COMPANY TO MOTION FOR
APPOINTMENT OF BILL B. DENDY AS MANDATORY SETTLEMENT CONFERENCE REFEREE

1 ROMAN CATHOLIC ARCHBISHOP OF
LOS ANGELES;
2 ROMO LAKE LOS ANGELES
PARTNERSHIP;
3 ROSEMOUNT EQUITIES LLC SERIES;
ROYAL INVESTORS GROUP;
4 ROYAL WESTERN PROPERTIES LLC;
OSCAR RUDNICK;
5 REBECCA RUDNICK;
SANTA MONICA MOUNTAINS
6 CONSERVANCY;
MARYGRACE H. SANTORO;
7 MARYGRACE H. SANTORO, AS TRUSTEE
FOR THE MARYGRACE H. SANTORO
8 REV TRUST;
SAN YU ENTERPRISES, INC.;
9 DANIEL SAPARZEDEH;
HELEN STATHATOS;
10 SAVAS STATHATOS;
SAVAS STATHATOS, AS TRUSTEE FOR
11 THE STATHATOS FAMILY TRUST;
SEVEN STAR UNITED LLC;
12 MARK H. SHAFRON;
ROBERT L. SHAFRON;
13 KAMRAM S. SHAKIB;
DONNA L. SIMPSON;
14 GARETH L. SIMPSON;
GARETH L. SIMPSON, AS TRUSTEE OF
15 THE SIMPSON FAMILY TRUST;
SOARING VISTA PROPERTIES, INC.;
16 STATE OF CALIFORNIA;
GEORGE C. STEVENS, JR.;
17 GEORGE C. STEVENS, JR., AS TRUSTEE
OF THE GEORGE C. STEVENS, JR. TRUST;
18 GEORGE L. STIMSON, JR.;
GEORGE L. STIMSON, JR., AS TRUSTEE
19 OF THE GEORGE L. STIMSON, JR. TRUST;
TEJON RANCHCORP;
20 MARK E. THOMPSON A P C PROFIT
SHARING PLAN;
21 TIERRA BONITA RANCH COMPANY;
TIONG D. TIU;
22 BEVERLY J. TOBIAS;
BEVERLY J. TOBIAS, AS TRUSTEE OF
23 THE TOBIAS FAMILY TRUST;
JUNG N. TOM;
24 WILLIAM BOLTHOUSE FARMS, INC.;
WILMA D. TRUEBLOOD;
25 WILMA D. TRUEBLOOD, AS TRUSTEE OF
THE TRUEBLOOD FAMILY TRUST;
26 UNISON INVESTMENT CO., LLC;
DELMAR D. VAN DAM;
27 GERTRUDE J. VAN DAM;

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STATEMENT OF SUPPORT BY SERVICE ROCK PRODUCTS CORPORATION, HEALY
ENTERPRISES, INC. AND SHEEP CREEK WATER COMPANY TO MOTION FOR
APPOINTMENT OF BILL B. DENDY AS MANDATORY SETTLEMENT CONFERENCE REFEREE

197088.1

1 KEITH E. WALES;
2 E C WHEELER LLC;
3 ALEX WODCHIS;
4 ELIZABETH WONG;
5 MARY WONG;
6 MIKE M. WU;
7 MIKE M. WU, AS TRUSTEE OF THE WU
8 FAMILY TRUST;
9 STATE OF CALIFORNIA 50TH DISTRICT
10 AND AGRICULTURAL ASSOCIATION;
11 THE UNITED STATES OF AMERICA;
12 U. S. BORAX, INC.;

13 and ROES 1 through 100,000, inclusive,

14 Cross-Defendants.

15 Cross-Defendants, **Service Rock Products Corporation**, as successor-in-interest to **Owl**
16 **Properties, Inc.**, (“Service Rock Products”), **Healy Enterprises, Inc.**, individually and in its
17 capacity as Lessor to Service Rock Products (“Healy”) and **Sheep Creek Water Company, Inc.**
18 (“Sheep Creek”) state their support for the Motion for Appointment of Bill B. Dendy as
19 Mandatory Settlement Conference Referee (the “Motion”).

20 Service Rock Products, Healy and Sheep Creek (collectively “Supporting Parties”)
21 actively participated in the process of evaluating the potential candidates that were presented
22 (through no small effort on the part of Mr. Brunick) to the parties for consideration; and believe
23 that Bill B. Dendy (“Mr. Dendy”) is the best candidate for the “job.”

24 Supporting Parties support the involvement of Mr. Dendy in the active facilitation of the
25 development of a physical solution for the Antelope Valley Groundwater Basin(s), and possibly
26 a stipulated judgment that incorporates an agreed physical solution. Counsel for Supporting
27 Parties have experience with Mr. Dendy’s involvement, in a similar capacity, in connection with
28 the Mojave Basin Groundwater Adjudication [*City or Barstow, et al. v. City of Adelanto, et al.,*
and Related Cross Actions, RCSC Case No. 208568 (“Mojave”)] and believe that his expertise
would be of considerable benefit to the parties in this action. Supporting Parties further submit
that Mr. Dendy’s usefulness will be greatly diminished if he is unable to report to the Court and

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STATEMENT OF SUPPORT BY SERVICE ROCK PRODUCTS CORPORATION, HEALY
ENTERPRISES, INC. AND SHEEP CREEK WATER COMPANY TO MOTION FOR
APPOINTMENT OF BILL B. DENDY AS MANDATORY SETTLEMENT CONFERENCE REFEREE

197088.1

1 if the parties to this action only voluntarily participate in the meetings at which Mr. Dendy works
2 to facilitate the development of a physical solution and possibly a stipulated judgment.

3 Supporting Parties, however, do not advocate or support giving Mr. Dendy or any other
4 person or entity the ability to "cram down" a physical solution on any party, as some responding
5 parties suggest.

6 Supporting Parties believe that Mr. Dendy's involvement would likely aid in bringing the
7 parties to a consensus on the key issues, including the technical issues, that the parties need to
8 address, and would lead the parties (which seem to continue to follow divergent paths) through
9 the process of addressing those issues in the context of evaluating practical, reasonable and fair
10 options, and assembling those options into a workable physical solution.

11 Finally, most of the concerns of the State and the City of Los Angeles Department of
12 Water and Power should be resolved by having Mr. Dendy serve at the pleasure of the Court.

13 Respectfully Submitted,

14 Dated: August 7, 2007

GRESHAM SAVAGE NOLAN & TILDEN,
A Professional Corporation

15
16
17 By: 

Michael Duane Davis
Attorneys for Cross-Defendants, Service Rock
Products Corporation, as successor-in-interest to
Owl Properties, Inc.; Healy Enterprises, Inc.,
individually and in its capacity as Lessee to
Service Rock Products Corporation, and Sheep
Creek Water Company, Inc.

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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 August 7, 2007, I served the foregoing document(s) described as **STATEMENT OF SUPPORT BY SERVICE ROCK PRODUCTS CORPORATION, AS SUCCESSOR-IN-INTEREST TO OWL PROPERTIES, INC., HEALY ENTERPRISES, INC., INDIVIDUALLY AND IN ITS CAPACITY AS LESSOR TO OWL PROPERTIES, INC., AND SHEEP CREEK WATER COMPANY, INC., TO MOTION FOR APPOINTMENT OF BILL B. DENDY AS MANDATORY SETTLEMENT CONFERENCE REFEREE** on the interested parties in this action in the following manner:

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,

BY MAIL - I served a true copy of the document(s) listed above in a sealed envelope and placed for collection and mailing following the usual business practice of the Firm. I am "readily familiar" with the Firm's practice of collection and processing correspondence for mailing. Under that practice, it would be deposited with the United States Postal Service with postage thereon fully prepaid at Riverside, California, on the same day in the ordinary course of business, addressed as follows:

Honorable Jack Komar
Santa Clara County Superior Court
191 North First Street, Dept. 17C
San Jose, CA 95113

Superior Court of California **[Original Documents to be filed at this location]**
County of Los Angeles
Stanley Mosk Courthouse, Dept. 1, Room 534
111 North Hill Street
Los Angeles, CA 90012

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

Executed on August 7, 2007, at Riverside, California.

Jeri Gallagher
TERI D. GALLAGHER