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5 Attorneys for Cross-Defendants and Cross-
 6 Complainants, ANTELOPE VALLEY UNITED
 MUTUAL GROUP; Cross-Defendants, MIRACLE
 7 IMPROVEMENT CORPORATION dba Golden
 Sands Mobile Home Park [ROE 1121], SAINT
 8 ANDREW'S ABBEY, INC. [ROE 623], SERVICE
 ROCK PRODUCTS, LP, as successor-in-interest to
 9 Owl Properties, Inc., SHEEP CREEK WATER
 COMPANY, INC.; and unnamed Cross-Defendant
 10 ADAMS BENNETT INVESTMENTS, LLC

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
 12 **IN AND FOR THE COUNTY OF LOS ANGELES**

13	Coordination Proceeding)	Judicial Council Coordination
14	Special Title (Rule 1550(b)))	Proceeding No. 4408
15	ANTELOPE VALLEY)	Santa Clara Case No. 1-05-CV-049053
16	GROUNDWATER CASES)	Assigned to the Honorable Jack Komar
17	Including Actions:)	Department 17C
18	Los Angeles County Waterworks District No.)	OBJECTION TO BOLTHOUSE
19	40 v. Diamond Farming Co.)	PROPERTIES, LLC AND WM. BOLTHOUSE
20	Superior Court of California, County of Los)	FARMS, INC. NOTICE TO APPEAR AND
21	Angeles, Case No. BC 325 201)	PRODUCE AT TRIAL OF CROSS-
22	Los Angeles County Waterworks District No.)	DEFENDANTS AND CROSS-
23	40 v. Diamond Farming Co.)	COMPLAINANTS, ANTELOPE VALLEY
24	Superior Court of California, County of Kern,)	UNITED MUTUAL GROUP; CROSS-
25	Case No. S-1500-CV-254-348)	DEFENDANTS, MIRACLE IMPROVEMENT
26	Wm. Bolthouse Farms, Inc. v. City of)	CORPORATION DBA GOLDEN SANDS
27	Lancaster)	MOBILE HOME PARK [ROE 1121], SAINT
28	Diamond Farming Co. v. City of Lancaster)	ANDREW'S ABBEY, INC. [ROE 623],
	Diamond Farming Co. v. Palmdale Water)	SERVICE ROCK PRODUCTS, LP, AS
	Dist.)	SUCCESSOR-IN-INTEREST TO OWL
	Superior Court of California, County of)	PROPERTIES, INC., SHEEP CREEK
	Riverside, consolidated actions, Case Nos.)	WATER COMPANY, INC.; AND UNNAMED
	RIC 353 840, RIC 344 436, RIC 344 668)	CROSS-DEFENDANT ADAMS BENNETT
	AND RELATED ACTIONS.)	INVESTMENTS, LLC
)	Trial Date: May 28, 2012
)	Time: 9:00 A.M.
)	Dept.: LA County Superior Court., Dept. 1
)	Judge: Hon. Jack Komar

1 TO THE COURT AND ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

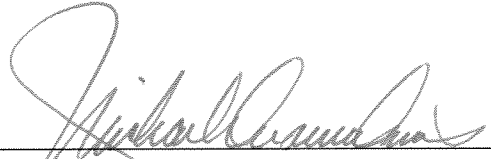
2 Cross-Defendants / Cross-Complainants, **ANTELOPE VALLEY UNITED MUTUAL**
3 **GROUP**; Cross-Defendants, **MIRACLE IMPROVEMENT CORPORATION, dba**
4 **GOLDEN SANDS MOBILE HOME PARK [ROE 1121]**, **SAINT ANDREW'S ABBEY,**
5 **INC. [ROE 623]**, **SERVICE ROCK PRODUCTS, LP, as successor-in-interest to Owl**
6 **Properties, Inc., SHEEP CREEK WATER COMPANY, INC.;** and Unnamed Cross-
7 Defendant **ADAMS BENNETT INVESTMENTS, LLC** (collectively "Said Parties"), by and
8 through their attorneys of record, Gresham Savage Nolan & Tilden, PC, by Michael Duane
9 Davis, Marlene L. Allen-Hammarlund, and Derek R. Hoffman hereby objects to the Notice to
10 Appear and Produce Documents at Trial ("Notice") of BOLTHOUSE PROPERTIES, LLC AND
11 WM. BOLTHOUSE FARMS, INC. served on it by e-service on their counsel on May 10, 2013
12 pursuant to CCP Section 1987 on the following grounds: (1) service of the Notice and request
13 for documents was untimely pursuant to CCP Sections 1987(c) and 1013(a); (2) to the extent a
14 subpoena is required, service was made by e-service only, which was not consented to; therefore
15 objection is made pursuant to CCP Section 1987 and CCP Section 1013(a); (3) the Notice was
16 not specific to the Said Parties, but was globally served on scores of parties in one purported
17 Notice, and therefore is overbroad and vague as to who is to appear, and is therefore objected to
18 pursuant to CCP Section 1987; (4) the request for documents was not particularized, failing to
19 specifically request the exact documents requested with particularity, and therefore is objected to
20 pursuant to CCP Section 1987; (5) no witness fees were tendered as required by CCP Section
21 1987; (6) further objection is made based on the fact that St. Andrew's Abbey, Inc. [Roe 623],
22 Service Rock Products, LP, as successor-in-interest to Owl Properties, Inc., Sheep Creek Water
23 Company, Inc., Miracle Improvement Corporation, dba Golden Sands Mobile Home Park [Roe
24 1121], and Adams Bennett Investments, LLC, are not part of the AV United Mutual Group; (7)
25 the Notice violates the Fourth Amended Case Management Order which requires specificity
26 regarding what issues and specific facts are being challenged; and (8) the Notice requests
27 documents other than those necessary for the purpose of determining groundwater pumping
28 during 2011 and 2012, which is the limited issue for the Phase 4 trial, as ordered by Judge

1 Komar at the hearing on May 17, 2013, and as set forth in the (Proposed) Fifth Amended Case
2 Management Order.

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DATED: May 23, 2013

GRESHAM SAVAGE NOLAN & TILDEN, PC

By: 

MICHAEL DUANE DAVIS, ESQ.
MARLENE L. ALLEN-HAMMARLUND, ESQ.
DEREK R. HOFFMAN, ESQ.
Attorneys for Cross-Defendants and Cross-Complainants,
ANTELOPE VALLEY UNITED MUTUAL GROUP; Cross-
Defendants, MIRACLE IMPROVEMENT CORPORATION dba
Golden Sands Mobile Home Park [ROE 1121], SAINT
ANDREW'S ABBEY, INC. [ROE 623], SERVICE ROCK
PRODUCTS, LP, as successor-in-interest to Owl Properties, Inc.,
SHEEP CREEK WATER COMPANY, INC.; and unnamed
Cross-Defendant ADAMS BENNETT INVESTMENTS, LLC

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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 May 23, 2013, I served the foregoing document(s) described as **OBJECTION TO BOLTHOUSE PROPERTIES, LLC AND WM. BOLTHOUSE FARMS, INC. NOTICE TO APPEAR AND PRODUCE AT TRIAL OF CROSS-DEFENDANTS AND CROSS-COMPLAINANTS, ANTELOPE VALLEY UNITED MUTUAL GROUP; CROSS-DEFENDANTS, MIRACLE IMPROVEMENT CORPORATION DBA GOLDEN SANDS MOBILE HOME PARK [ROE 1121], SAINT ANDREW'S ABBEY, INC. [ROE 623], SERVICE ROCK PRODUCTS, LP, AS SUCCESSOR-IN-INTEREST TO OWL PROPERTIES, INC., SHEEP CREEK WATER COMPANY, INC.; AND UNNAMED CROSS-DEFENDANT ADAMS BENNETT INVESTMENTS, LLC**

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 May 23, 2013, at Riverside, California.



DINA SNIDER