

1 Michael Duane Davis, SBN 093678
 2 Marlene L. Allen-Hammarlund, SBN 26418
GRESHAM SAVAGE NOLAN & TILDEN,
A Professional Corporation
 3 3750 University Avenue, Suite 250
 Riverside, CA 92501-3335
 4 Telephone: (951) 684-2171
 Facsimile: (951) 684-2150

5 Attorneys for Cross-Defendant/Cross-Complainant,
 6 A.V. UNITED MUTUAL GROUP; and Cross-
 Defendants, ADAMS BENNETT INVESTMENTS,
 7 LLC; MIRACLE IMPROVEMENT CORPORATION
 dba GOLDEN SANDS MOBILE HOME PARK, aka
 8 GOLDEN SANDS TRAILER PARK, named as ROE
 1121; ST. ANDREW'S ABBEY, INC., named as ROE
 9 623; SERVICE ROCK PRODUCTS, L.P.; and
 SHEEP CREEK WATER COMPANY, INC.

10
 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 <u>Consolidated</u> Actions:)	Department 17C
18	Los Angeles County Waterworks District)	CROSS-DEFENDANT/CROSS-
19	No. 40 v. Diamond Farming Co.)	COMPLAINANT, A.V. UNITED MUTUAL
20	Superior Court of California, County of Los)	GROUP; AND CROSS-DEFENDANTS,
21	Angeles, Case No. BC 325 201)	ADAMS BENNETT INVESTMENTS, LLC;
22	Los Angeles County Waterworks District)	MIRACLE IMPROVEMENT
23	No. 40 v. Diamond Farming Co.)	CORPORATION dba GOLDEN SANDS
24	Superior Court of California, County of)	MOBILE HOME PARK, aka GOLDEN
25	Kern, Case No. S-1500-CV-254-348)	SANDS TRAILER PARK [ROE 1121]; ST.
26	Wm. Bolthouse Farms, Inc. v. City of)	ANDREW'S ABBEY, INC. [ROE 623];
27	Lancaster)	SERVICE ROCK PRODUCTS, L.P.; AND
28	Diamond Farming Co. v. City of)	SHEEP CREEK WATER COMPANY,
	Lancaster)	INC.'S OPPOSITION TO PETITION TO
	Diamond Farming Co. v. Palmdale)	ADD-ON NEW WOOD CASE TO
	Water Dist.)	GROUNDWATER ADJUDICATION CASES
	Superior Court of California, County of)	Date: October 16, 2013
	Riverside, consolidated actions, Case Nos.)	Time: 10:00 A.M.
	RIC 353 840, RIC 344 436, RIC 344 668)	For Court's Use Only:
	AND RELATED ACTIONS.)	Santa Clara County
)	Case No. 1-05-CV-049053
)	(For E-Posting/E-Service Purposes Only)

1 **TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:**

2 Cross-Defendant / Cross-Complainant, **A. V. UNITED MUTUAL GROUP** [comprised
3 of Antelope Park Mutual Water Co., Aqua-J Mutual Water Co., Averydale Mutual Water Co.,
4 Baxter Mutual Water Co., Bleich Flat Mutual Water Co., Colorado Mutual Water Co., Eldorado
5 Mutual Water Co., Evergreen Mutual Water Co., Land Projects Mutual Water Co., Landale
6 Mutual Water Co., Shadow Acres Mutual Water Co., Sundale Mutual Water Co., Sunnyside
7 Farms Mutual Water Co., Tierra Bonita Mutual Water Co., Westside Park Mutual Water Co.,
8 and White Fence Farms Mutual Water Co., Inc.]; and Cross-Defendants, **ADAMS BENNETT**
9 **INVESTMENTS, LLC; MIRACLE IMPROVEMENT CORPORATION dba Golden**
10 **Sands Mobile Home Park, aka Golden Sands Trailer Park**, named as ROE 1121; **ST.**
11 **ANDREW'S ABBEY, INC.**, named as ROE 623; **SERVICE ROCK PRODUCTS, L.P.**; and,
12 **SHEEP CREEK WATER COMPANY, INC.**, by and through their attorneys of record,
13 Gresham Savage Nolan & Tilden, PC, by Michael Duane Davis and Marlene L. Allen-
14 Hammarlund, hereby oppose the Petition filed by Los Angeles County Waterworks District No.
15 40 ("District No. 40") to Add-On the case of *Richard Wood v. County of Los Angeles*, Los
16 Angeles County Superior Court Case No. BS143790 ("Recent Wood Case") to the within
17 coordinated and consolidated Antelope Valley Groundwater Adjudication cases (the
18 "Opposition").

19 This Opposition is based on the fact that the Recent Wood Case is not an action relating
20 to the adjudication of the groundwater in the Antelope Valley, but rather is an action filed solely
21 by Richard Wood concerning a Public Records Act ("PRA") Request he made to District No. 40
22 requesting public records to which he claims he is entitled. The parties to the Antelope Valley
23 Groundwater Adjudication should not be burdened with yet another case being added on to this
24 already complex case concerning issues that are solely between Mr. Wood and District No. 40.

25 Pursuant to the Minute Order filed by the Court on October 10, 2013, District No. 40's
26 Petition for Add-On Case will be heard on October 16, 2013, at 10:00 a.m. Accordingly, these
27 parties respectfully request that this Court rule that the Recent Wood Case not be an Add-On to

1 the existing Antelope Valley Groundwater Adjudication cases, but rather that the issue of the
2 PRA Request be handled separately since it does not involve any other parties to this action.

3 DATED: October 10, 2013.

Respectfully submitted,

4 GRESHAM SAVAGE NOLAN & TIDEN, PC

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6
7 By: 

8 MICHAEL DUANE DAVIS, ESQ.
9 MARLENE L. ALLEN-HAMMARLUND, ESQ.
10 Attorneys for CROSS-DEFENDANT / CROSS-
11 COMPLAINANT, A. V. UNITED MUTUAL GROUP;
12 and CROSS-DEFENDANTS, ADAMS BENNETT
13 INVESTMENTS, LLC, MIRACLE IMPROVEMENT
14 CORPORATION dba GOLDEN SANDS MOBILE
15 HOME PARK, aka GOLDEN SANDS TRAILER PARK
16 [ROE 1121], ST. ANDREW'S ABBEY, INC. [ROE
17 623], SERVICE ROCK PRODUCTS, L.P., and SHEEP
18 CREEK WATER COMPANY, INC.

**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 October 11, 2013, I served the foregoing document(s) described as **CROSS-DEFENDANT/CROSS-COMPLAINANT, A.V. UNITED MUTUAL GROUP; AND CROSS-DEFENDANTS, ADAMS BENNETT INVESTMENTS, LLC; MIRACLE IMPROVEMENT CORPORATION dba GOLDEN SANDS MOBILE HOME PARK, aka GOLDEN SANDS TRAILER PARK [ROE 1121]; ST. ANDREW'S ABBEY, INC. [ROE 623]; SERVICE ROCK PRODUCTS, L.P.; AND SHEEP CREEK WATER COMPANY, INC.'S OPPOSITION TO PETITION TO ADD-ON NEW WOOD CASE TO GROUNDWATER ADJUDICATION CASES** 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.scefilng.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 October 11, 2013, at Riverside, California.



DINA M. SNIDER