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6 Attorneys for SCI California Funeral Services, Inc.,  
a California corporation dba Joshua Memorial Park  
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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **IN AND FOR THE COUNTY OF LOS ANGELES**  
10

11 Coordination Proceeding ) Judicial Council Coordination  
12 Special Title (Rule 1550(b)) ) Proceeding No. 4408  
13 )  
14 **ANTELOPE VALLEY** ) Santa Clara Case No. 1-05-CV-049053  
15 **GROUNDWATER CASES** ) Assigned to the Honorable Jack Komar  
16 ) Department 17C  
17 Including **Consolidated** Actions: )  
18 **Los Angeles County Waterworks District** ) **DECLARATION OF CHRISTOPHER**  
19 **No. 40 v. Diamond Farming Co.** ) **TWITCHELL IN SUPPORT OF SCI**  
20 Superior Court of California, County of Los ) **CALIFORNIA FUNERAL SERVICES, INC.,**  
21 Angeles, Case No. BC 325 201 ) **A CALIFORNIA CORPORATION DBA**  
22 ) **JOSHUA MEMORIAL PARK'S MOTION**  
23 ) **TO INTERVENE IN JUDGMENT**  
24 **Los Angeles County Waterworks District** ) [Notice of Motion and Motion to Intervene;  
25 **No. 40 v. Diamond Farming Co.** ) Declaration of Jason Coleman, P.E.; Declaration  
26 Superior Court of California, County of ) of Derek R. Hoffman; and [Proposed] Order filed  
27 Kern, Case No. S-1500-CV-254-348 ) concurrently]  
28 **Wm. Bolthouse Farms, Inc. v. City of** )  
29 **Lancaster** ) Date: November 7, 2019  
30 **Diamond Farming Co. v. City of** ) Time: 9:00 a.m.  
31 **Lancaster** ) Judge: Hon. Jack Komar, Judge  
32 **Diamond Farming Co. v. Palmdale** )  
33 **Water Dist.** )  
34 ) **[Hearing to be conducted by Courtcall]**  
35 Superior Court of California, County of )  
36 Riverside, consolidated actions, Case Nos. )  
37 RIC 353 840, RIC 344 436, RIC 344 668 )  
38 )  
39 **AND RELATED ACTIONS.** )  
40 )  
41 )  
42 )

1 I, Christopher Twitchell, declare as follows:

2 1. I am the General Manager of the cemetery and mortuary known as Joshua  
3 Memorial Park, located at 808 East Lancaster Blvd., Lancaster, CA 93535. I give this  
4 declaration in support of SCI California Funeral Services, Inc., a California corporation dba  
5 Joshua Memorial Park's ("Joshua Memorial") Motion to Intervene in Judgment ("Motion") filed  
6 concurrently herewith. If called and sworn as a witness, I could and would competently testify to  
7 the following facts, having personal knowledge thereof.

8 2. I have served as the General Manager for Joshua Memorial since April 2018. In  
9 the course of my duties as General Manager, I am responsible for managing and overseeing day-  
10 to-day operations of Joshua Memorial, including its business operations, staff, records and  
11 property including its groundwater well and production system. I have reviewed and am familiar  
12 with the business records maintained by Joshua Memorial and its prior General Manager,  
13 including records pertaining to the groundwater well system.

14 3. Joshua Memorial is a cemetery and mortuary located at 808 East Lancaster Blvd.,  
15 Lancaster, CA 93535. The approximately forty-acre Joshua Memorial property includes an  
16 approximately twenty-one-acre cemetery, an approximately two-acre mortuary building and  
17 parking lot, a residential home at the southeast corner of the property, a mobile home at the  
18 western side of the property, and approximately sixteen acres of future cemetery grounds.

19 4. Joshua Memorial Park, Inc., a corporation, acquired the property in December 1949 by  
20 grant deed. A true and correct copy of that grant deed is attached to the Declaration of Derek  
21 Hoffman as Exhibit "2" at pages 8-10. On information and belief, the groundwater well on the  
22 property was developed in approximately the late 1950s, at or near the time Joshua Memorial  
23 began operating; and, has since produced groundwater for irrigation of the cemetery grounds.

24 5. The majority use of groundwater from the well is for irrigation of the cemetery  
25 grounds, which includes turf, various trees and shrubs and other vegetation, all supplied by the  
26 groundwater well. No water is used on the approximately sixteen acres of future cemetery  
27 grounds. The mortuary and a residential home on the property receive municipal water service and

1 do not rely on water supplied from the well.

2 6. In April 2018, the groundwater well serving the property ceased operating.  
3 Starting in approximately July 2018, in order to maintain the lawns, trees, shrubs and other  
4 landscaped areas, Joshua Memorial obtained a permit from Los Angeles County Department of  
5 Public Works to fill water trucks using nearby fire hydrants, as a temporary source of water for  
6 irrigation. A true and correct copy of that permit is attached hereto as *Exhibit "1"*. This  
7 temporary source of water is not sufficient to meet the irrigation needs of the property. Joshua  
8 Memorial is currently in the permitting process to construct a replacement groundwater well in  
9 conformity with the Judgment and Watermaster Rules and Regulations.

10 7. Though Joshua Memorial Park has continuously owned and operated the  
11 cemetery and produced groundwater for use on that property for decades, neither Joshua  
12 Memorial nor SCI, was ever named or served or, to my knowledge, otherwise joined in the  
13 Adjudication.

14 8. Joshua Memorial respectfully requests that this Court grant Joshua Memorial's  
15 Motion to Intervene, specifically as a Non-Stipulating Party, and enter an order establishing a  
16 Production Right for Joshua Memorial in the amount of 122 AFY in accordance with Judgment  
17 Section 5.1.10.

18 I declare under penalty of perjury under the laws of the State of California that the  
19 foregoing is true and correct. Dated this 10 day of October, 2019 at Lancaster,  
20 California.

21   
22 Christopher Twitchell

# EXHIBIT 1



**TEMPORARY CONSTRUCTION METER APPLICATION & INVOICE  
LOS ANGELES COUNTY WATERWORKS DISTRICTS**

**NORTH (ANTELOPE VALLEY) OFFICE**  
260 EAST AVENUE K-8  
LANCASTER, CA 93535  
Tel (661) 940-9270 • Fax (661) 726-1478

**SOUTH (MALIBU) OFFICE**  
23533 CIVIC CENTER WAY  
MALIBU, CA 90265

Tel (877) 637-3661 • Fax (310) 317-4674



PLEASE COMPLETE AND SIGN APPLICATION.

Type of Application:  New  Renewal  Relocation

|   |   |
|---|---|
| NAME OF PROPERTY OWNER:<br><i>Joshua Mem. Park - Service Corporation Intl</i>   | BILLING NAME:<br><i>Joshua Memorial Park</i>                            |
| LOCATION OF PROPERTY WHERE WATER WILL BE USED:<br>(ADDRESS, APN, PARCEL MAP NO, OR TRACT NO)<br><i>808 E Lancaster Blvd</i>   | BILLING ADDRESS:<br><i>808 E. Lancaster Blvd<br/>Lancaster CA 93535</i> |
| METER REQUEST DATE: _____   |   |
| REMOVAL REQUEST DATE: _____   |   |
| DISTANCE FROM CONSTRUCTION METER TO PROPERTY:<br><i>20 Meters</i>   | PHONE NUMBER: <i>661 942-8125</i>                                       |
| LOCATION OF HYDRANT WHERE CONSTRUCTION METER IS TO BE SET IN RELATION TO NEAREST CROSS STREET OR STREET ADDRESS:<br>(If applying for relocation, list current and proposed meter location):<br><i>Challenger Way and Lancaster Blvd</i> |   |

CONSTRUCTION METER PURPOSE: (The District may require proof of construction in the form of a current Building or Grading Permit.)

I understand that this application is for temporary water (through a construction meter) for the sole purpose of construction work at the address/location stated above. I further understand that the District has the right to remove the construction meter without prior notice if the meter is being used in an improper manner as determined by the District, and will discontinue any water service to the properties until permanent water service is established. Time period for use of construction meter will expire upon the following (whichever occurs first): 1) Six months, 2) Expiration of the permit, 3) Completion of the permitted work, or 4) Permanent water service is established. I also understand that the water supplied through the meter may be subject to frequent or indefinite interruptions at any time by the District. I also understand that I am responsible for this meter and its usage until I give proper written notification to the District office that the meter is to be removed and the District has the meter back in its possession. I also understand that I will operate the meter in a responsible manner so as not to cause damage to the meter and/or the water system and agree to be held accountable for any and all damage caused from improper operation of the meter (i.e. damage from water pressure spikes caused by rotating the valve faster than one-quarter revolution every \_\_\_\_ second(s), failure to disconnect the hose when leaving the meter location, failure to close valve properly, etc.). A missing or stolen water meter will be assessed at the current replacement rate. Payment for the meter replacement must be made at the District office before re-installation. I also understand that by the District issuing this temporary meter, this action in no way obligates the District to provide me with permanent water service to the subject property. I understand that each temporary meter must be equipped with approved  backflow prevention and/or  pressure regulating assemblies for the duration of use provided by me. I also understand that I will be responsible for properly testing, installing, and operating these assemblies. I also understand that per Part 5 Section B-1d of the Los Angeles County Waterworks Districts Rules and Regulations, any existing temporary meter shall be removed in a Phase I Water Shortage.

SIGNATURE: *[Signature]* DATE: *5-23-18*

|   |   |
|---|---|
| COMPANY RESPONSIBLE:<br><i>Joshua Memorial Park</i>                     | PERSON RESPONSIBLE:<br><i>Chris Twitchell</i>           |
| MAILING ADDRESS:<br><i>808 E. Lancaster Blvd<br/>Lancaster CA 93534</i> | PHONE: <i>661 942-8125</i>                              |
|   | FAX: <i>661 942-8164</i>                                |
|   | EMAIL: <i>christopher.twitchell@dignitymemorial.com</i> |

**OFFICE USE ONLY**

WATER USE OUTSIDE DISTRICT?  NO IF NO, APPROVED BY ENGINEER INITIALS: \_\_\_\_\_  
 YES IF YES, APPROVED BY AREA ENGINEER DATE: \_\_\_\_\_

CUSTOMER NO: *6055190* ACCOUNT NO: *04654415*

TEMPORARY CONSTRUCTION METER ISSUANCE OR RENEWAL: \$205.00 RELOCATION \$96.91  
 PRESSURE ZONE: *2555* APPROVED BY INITIALS/DATE: *g.m.*  
 METER BILL CODE: *WA2* CONFIRMATION NO.: \_\_\_\_\_ PAYMENT DATE: \_\_\_\_\_  
 INPUTTED IN CIS BY: \_\_\_\_\_ DATE: \_\_\_\_\_ DATE TO BE REMOVED: *11/19/18*

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**PROOF OF SERVICE**  
**STATE OF CALIFORNIA, COUNTY OF SAN BERNARDINO**

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 San Bernardino, State of California. I am over the age of 18 years and not a party to the within action; my business address is: 550 East Hospitality Lane, Suite 300, San Bernardino, CA 92408-4205.

On October 11, 2019, I served the foregoing document(s) described **DECLARATION OF CHRISTOPHER TWITCHELL IN SUPPORT OF SCI CALIFORNIA FUNERAL SERVICES, INC., A CALIFORNIA CORPORATION DBA JOSHUA MEMORIAL PARK'S MOTION TO INTERVENE IN JUDGMENT** on the interested parties in this action in the following manner:

( X ) **BY ELECTRONIC SERVICE** – I caused such document(s) listed above to be electronically served, via One Legal, to all parties appearing on the Santa Clara County Superior Court website, <http://www.scefiling.org>, in the action of the Antelope Valley Groundwater Cases; proof of electronic-filing through One Legal is then printed and maintained with the original documents in our office. Electronic service is complete at the time of transmission. My electronic notification email address is [dina.snider@greshamsavage.com](mailto:dina.snider@greshamsavage.com),

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, 2019 at San Bernardino, California.

  
DINA M. SNIDER