



1 Objections to the SOD filed by Tejon Ranchcorp.

2 **1. There is no Evidence to Support a Finding of Subsidence North of the Willow**  
3 **Springs Fault Line.**

4 The Tentative Decision states at page 6, lines 1 through 2:

5 “The physical evidence establishes that there was significant subsidence  
6 occurring throughout the valley ranging from two to six feet or more in  
certain areas of the valley . . .”

7 Likewise, the SOD states at page 4, lines 24-26:

8 “The physical evidence establishes that there was significant subsidence  
9 occurring throughout the Antelope Valley Adjudication Area ranging  
from two to six feet or more in certain areas of the valley . . .”

10 These statements are made despite the fact: 1) that no witness testified that subsidence has  
11 occurred or is occurring throughout the valley; 2) no physical evidence was introduced showing that  
12 subsidence was occurring or had occurred north of the Willow Springs fault line; 3) The PWS’s experts,  
13 Joe Scalmanini and Mark Wildermuth, testified that subsidence was limited to those areas within the  
14 Antelope Valley Adjudication depicted on Scalmanini Exhibit 20 and Wildermuth Exhibit 57.

15 Since there is no evidence supporting the assertion that subsidence has occurred in the part of  
16 the Antelope Valley Adjudication lying north of the Willow Springs fault line, the SOD should be  
17 revised to state as follows:

18 “The physical evidence establishes that there was significant subsidence  
19 occurring in some areas of the Antelope Valley Adjudication Area  
ranging from two to six feet or more in the Lancaster and Palmdale areas  
20 . . . .”

21 **2. Joinder in Objections and Proposals of Tejon Ranchcorp.**

22 Diamond Farming Company, Crystal Organic Farms, Grimmway Enterprises, Inc., and Lapis  
23 Land Company, LLC hereby join in the Objections and Proposals for modifying the SOD, said  
24 objections and proposals are incorporated herein as though fully set forth.

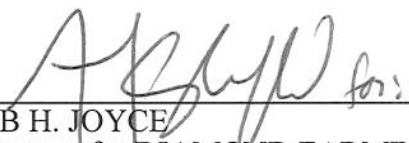
25 **3. Conclusion.**

26 For the reasons set forth herein and those contained in the Objections filed by Tejon Ranchcorp,  
27 Diamond Farming Company, Crystal Organic Farms, Grimmway Enterprises, Inc., and Lapis Land

1 Company, LLC request that the Court direct the PWS to submit a revised proposed Statement of  
2 Decision consistent with modifications and proposals set forth by way of this Objection and the  
3 Objections of Tejon Ranchcorp.

4  
5 Dated: June 21, 2011

LeBEAU • THELEN, LLP

6  
7  
8 By:  for:  
9 BOB H. JOYCE  
10 Attorneys for DIAMOND FARMING COMPANY,  
11 a California corporation, CRYSTAL ORGANIC  
12 FARMS, a limited liability company, GRIMMWAY  
13 ENTERPRISES, INC., and LAPIS LAND  
14 COMPANY, LLC  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

**PROOF OF SERVICE**

1 ANTELOPE VALLEY GROUNDWATER CASES  
2 JUDICIAL COUNCIL PROCEEDING NO. 4408  
3 CASE NO.: 1-05-CV-049053

4 I am a citizen of the United States and a resident of the county aforesaid; I am over the age  
5 of eighteen years and not a party to the within action; my business address is: 5001 E. Commercenter  
6 Drive, Suite 300, Bakersfield, California 93309. On June 21, 2011, I served the within  
7 **OBJECTION TO PROPOSED STATEMENT OF DECISION RE: PHASE THREE TRIAL**  
8 **AND JOINDER IN OBJECTIONS TO STATEMENT OF DECISION FILED BY TEJON**  
9 **RANCHCORP BY DIAMOND FARMING COMPANY, CRYSTAL ORGANIC FARMS,**  
10 **GRIMMWAY ENTERPRISES, INC., and LAPIS LAND COMPANY, LLC**

11 ■ (BY POSTING) I am “readily familiar” with the Court’s Clarification Order.  
12 Electronic service and electronic posting completed through [www.scefiling.org](http://www.scefiling.org) ; All papers filed  
13 in Los Angeles County Superior Court and copy sent to trial judge and Chair of Judicial Council.

14 Los Angeles County Superior Court  
15 111 North Hill Street  
16 Los Angeles, CA 90012  
17 Attn: **Department 1**  
(213) 893-1014

Chair, Judicial Council of California  
Administrative Office of the Courts  
Attn: Appellate & Trial Court Judicial Services  
(Civil Case Coordinator)  
Carlotta Tillman  
455 Golden Gate Avenue  
San Francisco, CA 94102-3688  
Fax (415) 865-4315

18 ■ (STATE) I declare under penalty of perjury under the laws of the State of  
19 California that the above is true and correct, and that the foregoing was executed on June 21,  
20 2011, in Bakersfield, California.

21   
22 LEQUETTA HANSEN

23  
24  
25  
26  
27  
28