

1 **COLDREN LAW OFFICES**
2 **A Professional Law Corporation**
3 Robert S. Coldren (Bar No. 81710)
4 3 Hutton Centre Drive, Ninth Floor
5 Santa Ana, California 92707
6 (714) 955-6106
7 Email: RColdren@coldrenlawoffices.com

8 Attorneys for Cross-Defendant,
9 MILANA VII, LLC, dba Rosamond Mobile Home Park

10
11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12
13 **COUNTY OF LOS ANGELES**

14 ANTELOPE VALLEY GROUNDWATER
15 CASES

16 Included Actions:

17 Los Angeles County Waterworks District No.
18 40 v. Diamond Farming Co.
19 Los Angeles County Superior Court
20 Case No. BC 325201

21 Los Angeles County Waterworks District No.
22 40 v. Diamond Farming Co.
23 Kern County Superior Court
24 Case No. S-1500-CV-254-348

25 Wm. Bolthouse Farms, Inc. v. City of
26 Lancaster, Diamond Farming Co. v. City of
27 Lancaster, Diamond Farming Co. v. Palmdale
28 Water Dist.
Riverside County Superior Court
Consolidated actions
Case Nos. RJC 353 840, RIC 344 436, RIC 344
668

Judicial Council Coordination No. 4408

For filing purposes only:
Santa Clara County Case No. 1-05-CV-049053

Assigned to The Honorable Jack Komar

**CROSS-DEFENDANT MILANA VII, LLC,
dba ROSAMOND MOBILE HOME PARK'S
OBJECTIONS TO MOTION FOR
PRELIMINARY APPROVAL OF CLASS
SETTLEMENT AND REQUEST MOTION
BE CONTINUED OR DENIED IN ITS
ENTIRETY**

Date: March 26, 2015

Time: 10:00 a.m.

Place: L.A.S.C., Room 222

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

30 Cross-Defendant Milana VII, LLC, dba Rosamond Mobile Home Park, hereby objects to
31 the plaintiff Wood Class Motion for Preliminary Approval of Class Settlement, without waiving its
32 rights and without prejudice, as follows:

33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100
OBJECTIONS

1. Cross-Defendant objects on the grounds of inadequate notice in that motion was evidently filed and electronically served on or about March 4, 2015, only sixteen court days prior to the hearing date of the motion. Cross-Defendant does not believe it consented to service of pleadings electronically such as to permit this motion to be filed and served as it was, even if this Court has ordered otherwise.
2. Cross-Defendant further objects on the grounds the motion is untimely and premature for a number of reasons, including, without being limited to, the fact that it is unclear who all of the moving parties are in that it appears Defendant North Edwards Water District is a moving party but has not joined on the motion, apparently because the defendant has not yet signed a stipulation of settlement.
3. Cross-Defendant objects for a number of timing reason, including, without being limited to, the fact that Cross-Defendant only appeared in this case a little more than six (6) months ago, there is literally 9,600 different documents on the court docket relating to this matter, Cross-Defendants has not had sufficient time to review the entire case so as to object or not object to the terms of the proposed settlement. Cross-Defendant objects that this constitutes a basic violation of its due process rights.
4. Cross-Defendant objects that it is patently unfair from a due process standpoint to require parties to respond and object to such a colossal motion in only sixteen court days, such that the motion should be denied or at least continued for 30 to 60 days.
5. Cross-Defendant objects to the proposed deadlines in the motion, and in particular the deadline to object proposed to be set on April 1, 2015. Evaluating and preparing objections only four (4) court days from this hearing is inadequate and unfair.
6. Counsel attempted to reach class counsel this week by telephone to discuss some of the issues herein, but was told both counsel unavailable when called.
7. Cross-Defendant requests based on the foregoing the motion be denied or at least continued at least continued for 30-60 days.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

8. Cross-Defendant joins in the objections lodged by the other parties in this case, including, without being limited to, those objection and opposition made by counsel for the Willis Class.

Dated: March 25, 2015

COLDREN LAW OFFICES

By: Robert S. Coldren /s/
Robert S. Coldren
Attorney for Cross-Defendant,
MILANA VII, LLC, dba Rosamond Mobile
Home Park