

1 MARVIN G. BURNS, STATE BAR NO. 25598
MARVIN G. BURNS, A LAW CORPORATION
2 9107 Wilshire Boulevard, Suite 800
Beverly Hills, California 90210
3 Telephone: (310) 278-6500
Facsimile: (310) 203-9608
4

5 Attorneys for Defendants
GEORGE C. STEVENS, JR. (served as Doe 161)
6 and GEORGE C. STEVENS, JR. AS TRUSTEE
OF THE GEORGE C. STEVENS, JR. TRUST
7 (served as Doe 162)

8 SUPERIOR COURT FOR THE STATE OF CALIFORNIA

9 COUNTY OF LOS ANGELES

10
11 Coordination Proceeding
Special Title (Rule 1550 (b))

) Judicial Council Coordination Proceeding
No. 4408

12 **ANTELOPE VALLEY GROUNDWATER**
13 **CASES**

) **CASE MANAGEMENT CONFERENCE**
) **STATEMENT OF DEFENDANTS**
) **GEORGE C. STEVENS, JR. AND GEORGE**
) **C. STEVENS, JR. TRUSTEE OF THE**
) **GEORGE C. STEVENS, JR. TRUST**

14 Included Actions:

15 Los Angeles County Waterworks District No. 40 v.
Diamond Farming Co.
16 Superior Court of California
County of Los Angeles, Case No. BC 325 201

) DATE: February 17, 2006
) TIME: 9:00 a.m.
) DEPT: 1

17 Los Angeles County Waterworks District No. 40 v.
18 Diamond Farming Co.
Superior Court of California
19 County of Kern, Case No. S-1500-CV-254-348

20 Wm. Bolthouse Farms, Inc. v. City of Lancaster
Diamond Farming Co. v. City of Lancaster;
21 Diamond Farming Co. v. Palmdale Water Dist.
Superior Court of California, County of Riverside,
22 consolidated actions, Case Nos. RIC 353 840,
RIC 344 436, RIC 344 668
23

24 Defendants George C. Stevens, Jr. and George C. Stevens, Jr. Trustee submit the following
25 case management statement:

26 These defendants own a small parcel (158.1 acres) of agricultural land within the Antelope
27 Valley. That parcel is currently fallow. These defendants also own or have an interest in other still
28 smaller parcels within the Antelope Valley that are zoned industrial or residential. These smaller

1 parcels are not yet subject to this litigation but, these defendants are informed, will be subject to this
2 litigation in the near future.

3 The cost of this litigation to these defendants and other owners of small parcels within the
4 Antelope Valley will exceed the value of their property if they are compelled to remain as parties in
5 order to protect their rights.

6 These defendants suggest that this court require that all parties who plaintiff's contemplate to
7 join in this litigation be forthwith served with process and joined.

8 When all contemplated parties have been joined, we suggest that this court order a mediation
9 that will have for its purpose obtaining a stipulation that all property owners who seek to join in the
10 stipulation be protected by a favorite nations provision to the effect that none of the defendants who
11 stipulate will suffer any detriment or gain any advantage other or different than the result of this
12 litigation as to property owners in their respective subclasses; that the subclasses be determined by
13 acreage, by usage (i.e. agricultural, industrial, residential), by water service or wells and that pending
14 the outcome of this litigation those defendants who joined in the stipulation will be relieved from
15 taking part in discovery, court hearings, court appearances, trials, writ proceedings and appeals.

16 If a stipulation cannot be obtained, then we suggest that the small landowners, who wish to
17 do so, join together in "classes" to litigate this lawsuit as groups, thereby reducing the expense to
18 each.

19 Dated: January 23, 2006

Respectfully submitted.

20 MARVIN G. BURNS
21 MARVIN G. BURNS, A LAW CORPORATION

22
23 By: 

24 Marvin G. Burns
25 Attorneys for Defendants
26 GEORGE C. STEVENS, and GEORGE C. STEVENS,
27 JR. TRUSTEE
28

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES.

3 I am employed in the County of Los Angeles, State of California. I am over the age of 18
4 and not a party to the within action; my business address is 9107 Wilshire Boulevard, Suite 800,
Beverly Hills, California 90210-5533.

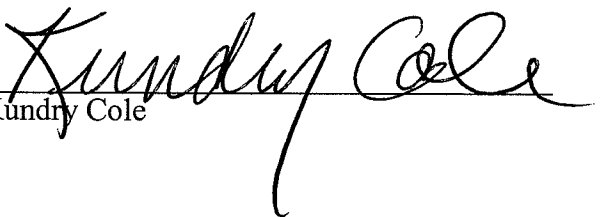
5 On January 23, 2006, I caused the foregoing document described as **CASE**
6 **MANAGEMENT CONFERENCE STATEMENT OF DEFENDANTS GEORGE C.**
7 **STEVENS, JR. AND GEORGE C. STEVENS, JR. AS TRUSTEE** to be served on the interested
parties in this action as follows:

8 **SEE ATTACHED SERVICE LIST**

- 9 BY ELECTRONIC SERVICE AS FOLLOWS (to parties so indicated on attached service
10 list): by posting the document(s) listed above to the Santa Clara County Superior Court
11 website in regard to the Antelope Valley Groundwater matter (per Santa Clara Superior
12 Court E-Filing in Complex Litigation Pursuant to Clarification Order Dated October 27,
13 2005).
- 14 BY MAIL AS FOLLOWS (to parties so indicated on attached service list): By placing true
15 copies thereof enclosed in sealed envelopes addressed as indicated on the attached service
16 list. I caused such envelopes to be deposited in the mail at Los Angeles, California. The
17 envelopes were mailed with postage thereon fully prepaid. I am "readily familiar" with the
18 Firm's practice of collecting and processing correspondence for mailing with the United
19 States Postal Service. It is deposited with the U.S. Postal Service on the same day in the
ordinary course of business.
- 20 BY PERSONAL SERVICE: I delivered such envelope by hand to the addressees at the Los
21 Angeles Superior Court located at 111 North Hill Street, Los Angeles, California 90012.
- 22 BY MESSENGER: I caused such envelope to be delivered by hand by SOUTHERN
CALIFORNIA MESSENGERS to the addressee(s).
- 23 BY OVERNIGHT COURIER: I caused the above-referenced document(s) to be delivered to
24 FEDERAL EXPRESS for delivery to the above address(es).
- 25 BY FACSIMILE MACHINE: I am "readily familiar" with the Firm's practice of collecting
26 and processing correspondence which is sent via facsimile. It is transmitted to the recipient
27 on the same day in the ordinary course of business.

28 Executed on January 23, 2006, at Los Angeles, California.

- 29 (State) I declare under penalty of perjury under the laws of the State of California that the
30 above is true and correct.
- 31 (Federal) I declare that I am employed in the office of a member of the bar of this court at
32 whose direction the service was made.

33 
Kundry Cole

**ANTELOPE VALLEY GROUNDWATER CASES
JCCP NO. 4408**

SERVICE LIST

BY ELECTRONIC SERVICE TO THE FOLLOWING:

| | | |
|--|---|--|
| | <p>Presiding Judge of the Superior Court of California, County of Los Angeles County Courthouse 111 North Hill Street Los Angeles, CA 90012-3014</p> | |
| | <p>Chair, Judicial Council of California Administrative Office of the Court Attn: Appellate & Trial Court Judicial Services (Civil Case Coordination) 455 Golden Gate Avenue San Francisco, CA 94102-3688</p> | |
| | <p>Hon. Jack Komar Superior Court of California County of Santa Clara 191 North First Street, Dept. 17C San Jose, CA 95113</p> | <p>408-882-2280 (P) 408-882-2293 (F)</p> |
| <p>United States Department of Justice</p> | <p>R. Lee Leininger, Esq. U.S. Department of Justice Environment and Natural Resources Division 999 18th Street, Ste. 945 North Tower Denver, CO 80202</p> | <p>(303) 312-7300 (P) (303) 312-7331-(F)</p> |
| <p>Bolthouse Properties, Inc.</p> | <p>Richard Zimmer T. Mark Smith CLIFFORD & BROWN 1430 Truxtun Avenue, Suite 900 Bakersfield, CA 93301</p> | <p>661-322-6023 (P) 661-322-3508 (F)</p> |
| <p>City of Lancaster</p> | <p>Douglas J. Evertz Jeffrey Robbins STRADLING, YOCCA, CARLSON & RAUTH 660 Newport Center Drive, Suite 1600 Newport Beach, CA 92660-6522</p> | <p>949-737-4720 (P) 949-725-4100 (F) 916-823-6720 (F) JRobbins@sycr.com</p> |

| | | | |
|---|--|---|--|
| 1 | City of Palmdale | James L. Markman RICHARDS, WATSON & GERSHON P.O. Box 1059 Brea, CA 92822-1059 | 714-990-0901 (P) 714-990-6230 (F) jmarkman@rwglaw.com |
| 2 | | Steve R. Orr Bruce G. McCarthy RICHARDS, WATSON & GERSON 355 South Grand Avenue, 40 th Floor Los Angeles, CA 90071-3101 | 213-626-8484 (P) 213-626-0078 (F) sorr@rwglaw.com |
| 3 | | Wm. Matthew Ditzhazy, City Attorney CITY OF PALMDALE Legal Department 38300 North Sierra Highway Palmdale, CA 93550 | 805-267-5108 (P) 805-267-5178 (F) mditzhazy@ cityofpalmdale.org |
| 4 | Diamond Farming Company | Bob H. Joyce LAW OFFICES OF LEBEAU THELEN LLP 5001 East Commercenter Drive, Suite 300 P.O. Box 12092 Bakersfield, CA 93389-2092 | 661-325-8962 (P) 661-325-1127 (F) bjoyce@labeauthelen.com |
| 5 | Eugene B. Nebeker on behalf of Nebeker Ranch, Inc., Bob Jones on behalf of R&M Ranch, Inc., Forrest G. Godde and Steve Godde, Gailen Kyle on behalf of Kyle & Kyle Ranch, Inc. and John Calandri on behalf of Calandri/Sonrise Farms, collectively known as the Antelope Valley Ground Water Agreement Association ("AGWA") | Michael Fife HATCH & PARENT 21 East Carrillo Street Santa Barbara, CA 93101-2782 | 805-963-7000 (P) 805-965-4333 (F) afavia@hatchparent.com |
| 6 | Littlerock Creek Irrigation District and Palm Ranch Irrigation District | Wayne K. Lemieux LEMIEUX & O'NEILL 2393 Townsgate Road, Suite 201 Westlake Village, CA 91361 | 805-495-4770 (P) 805-495-2787 (F) |

| | | | |
|---|---|---|--|
| 1 2 3 4 5 6 7 8 | Los Angeles County Sanitation Districts Nos. 14 and 20 | Christopher M. Sanders Peter J. Kiel Anne J. Schneider ELLISON SCHNEIDER & HARRIS 2015 H Street Sacramento, CA 95814-3109 B. Richard Marsh Daniel V. Hyde LEWIS, BRISBOIS, BISGAARD & SMITH LLP 221 N. Figueroa Street, Suite 1200 Los Angeles, CA 90012 | 916-447-2166 (P) 916-447-3512 (F) pjk@eslawfirm.com 213-250-1800 (P) 213-250-7900 (F) |
| 9 10 11 12 13 14 15 16 | Los Angeles County Waterworks District No. 40 (Plaintiff) | Eric L. Garner Jeffrey V. Dunn Sandra M. Schwarzmann Jill N. Willis BEST BEST & KRIEGER LLP 5 Park Plaza, Suite 1500 Irvine, CA 92614 Raymond G. Fortner, Jr., County Counsel Frederick W. Pfaeffle, Sr. Deputy County Counsel OFFICE OF COUNTY COUNSEL COUNTY OF LOS ANGELES 500 West Temple Street Los Angeles, CA 90012 | 949-263-2600 (P) 949-263-2600 (P) 949-260-0972 (F) Jeffrey.Dunn@bbkclaw.com 213-974-1901 (P) |
| 17 18 19 | Palmdale Water District and Quartz Hill Water District | Thomas Bunn LAGERLOF, SENEAL, BRADLEY, GOSNEY & KRUSE 301 North Lake Avenue, 10 th Floor Pasadena, CA 91101-4108 | 626-793-9400 (P) 626-793-5900 (F) TomBunn@Lagerlof.com |
| 20 21 22 | Tejon Ranch | Henry Weinstock NOSSAMAN, GUTHNER, KNOX & ELLIOTT 445 South Figueroa Street, 31 st Floor Los Angeles, CA 90071 | 213-612-7839 (P) 213-612-7801 (F) HWeinstock@ Nossaman.com |
| 23 24 25 26 | State of California; Santa Monica Mountains Conservancy; and the 50 th District Agricultural Association | Michael L. Crow, Esq. Deputy Attorney General State of California – Dept. of Justice 1300 I Street, Ste. 125 P.O. Box 944255 Sacramento, CA 94244-2550 | (916) 327-7856 (P) (916) 327-2319-(F) |

| | | | |
|----|--|--|--|
| 1 | Melinda Gillman on behalf of Roland N. Grubb | James J. Waldorf, Esq. Irsfeld, Irsfeld & Younger LLP 100 West Broadway, Ste. 900 Glendale, CA 91210-1296 | (818) 242-6859 (P) (818) 240-7728-(F) |
| 2 | | | |
| 3 | | | |
| 4 | GGF, LLC | Denis M. O'Rourke, Esq. O'Rourke & Fong L.L.P. 100 West Broadway, Ste. 1250 Glendale, CA 91210 | (818) 247-4303 (P) (818) 247-1451-(F) |
| 5 | | | |
| 6 | | | |
| 7 | Burroughs Family Irrevocable Trust | Daniel M. Hattis, Esq. Law Offices of Angelo Salvatore Parise 16870 West Bernardo Drive, Ste. 400 San Diego, CA 92127 | (858) 674-6660 (P) (858) 674-6661-(F) |
| 8 | | | |
| 9 | | | |
| 10 | Unison Investment, LLC | Miriam L. Wu Leo Pelletier & Wu 1661 Hanover Street, Ste. 215 City of Industry, CA 91745 | (626) 588-2506 (P) (626) 576-8378-(F) |
| 11 | | | |
| 12 | Department of Water and Power | Julie A. Conboy DEPARTMENT OF WATER AND POWER 111 North Hope Street P.O. Box 111 Los Angeles, CA 90012 | 213-367-4513 (P) 213-367-4588 (F) 213-241-1416 (F) Julie.Conboy@ladwp.com |
| 13 | | | |
| 14 | | | |
| 15 | | | |
| 16 | City of Los Angeles | Janet K. Goldsmith KRONICK, MOSKOWITZ, TIEDEMANN & GIRARD 400 Capitol Mall, 27 th Floor Sacramento, CA 95814-4417 | 916-320-4500 (P) 916-321-4555 (F) |
| 17 | | | |
| 18 | | | |
| 19 | | | |

| | | | |
|--|-------------------------------------|--|--|
| 20 BY U.S. MAIL TO THE FOLLOWING: | | | |
| 21 | California Water Service Company | John Tootle CALIFORNIA WATER SERVICE COMPANY 2632 West 237 th Street Torrance, CA 90505 | 310-379-5528 (P) 310-379-5135 (F) 310-325-4605 (F) |
| 22 | | | |
| 23 | | | |
| 24 | Air Trust Singapore Limited | Loretta Slaton, Esq. Law Office of Loretta Slaton 2294 Via Puerta, Suite O Laguna Hills, CA 92653 | 949-587-2832 (P) 949-855-1959-(F) |
| 25 | | | |
| 26 | | | |
| 27 | | | |
| 28 | | | |

| | | | |
|----|--|--|--|
| 1 | Gus A. Barks, Jr. and Peter G. Barks | Robert Schachter, Esq. Hitchcock Bowman & Schachter 21515 Hawthorne Blvd., Suite 1030 Torrance, CA 90503-6579 | (310) 540-2202 (P) (310) 540-8734 (F) |
| 2 | | | |
| 3 | | | |
| 4 | Barbara J. Calandri and Barbara J. Calandri Trust | Mark E. Thompson, A.P.C. Attorney At Law 857 W. Lancaster Blvd. Lancaster, CA 93534-2348 | (661) 945-5868 (P) (661) 723-7089 (F) |
| 5 | | | |
| 6 | | | |
| 7 | Ruth Cumming and Ruth A. Cumming as Trustee for the Cumming Family Trust | Barry R. Gore, Esq. Clarkson, Gore & Marsella 3424 Carson St., Suite 350 Torrance, CA 90503 | (310) 542-0111 (P) (310) 214-7254 (F) |
| 8 | | | |
| 9 | | | |
| 10 | Chi S. Haung and Suchu T. Haung | David McDonnell, Esq. Attorney At Law 27405 Puerta Real, Suite 360 Mission Viejo, CA 92630 | (949) 305-7614 (P) (949) 305-7670 (F) |
| 11 | | | |
| 12 | Lillian Kauffman, and the Kauffman Family Trust | Stuart I. Schneider, Esq. Law Office of Stuart I. Schneider 250 N. Westlake Blvd., Suite 240 Thousand Oaks, CA 91362 | (805) 777-1179 (P) (805) 777-1725 (F) |
| 13 | | | |
| 14 | | | |
| 15 | Wendell Hanks, William Lewis, Mary Lewis (erroneously listed as Lyman Miles, Doe Defendant #111 and Doe Defendant #112) | Wendell Hanks 12702 Groveside Avenue La Mirada, CA 90638 | (562) 943-2721 (P) |
| 16 | | | |
| 17 | | | |
| 18 | | | |
| 19 | Elias Qarmout | Manuel Rivas, Jr., Esq. Law Offices of Friedland Farling & Hecht 95 S. Market St., #640 San Jose, CA 95113 | (408) 297-5300 (P) (408) 297-0900 (F) |
| 20 | | | |
| 21 | | | |
| 22 | US Borax, Inc. | William M. Sloan, Esq. Edward Washburn, Esq. Morrison & Forester, LLP 425 Market Street San Francisco, CA 94105-2482 | (415) 268-7000 (P) (415) 268-7522 (F) |
| 23 | | | |
| 24 | | | |
| 25 | Del Sur Ranch LLC | Mark J. Hattam, Esq. Allen Matkins 501 West Broadway, 15 th Floor San Diego, CA 92101-3547 | (619) 233-1155 (P) (619) 233-1158-(F) |
| 26 | | | |
| 27 | | | |
| 28 | | | |

| | | | |
|----|--|---|--|
| 1 | Genus LP | Elliot Luchs, Esq. 6377 Riverside Avenue, Ste. 200 Riverside, CA 92506 | (951) 274-2484 (P) (951) 786-3604-(F) |
| 2 | | | |
| 3 | Jung N. Tom and Sheng Tom | Robert P. Allenby, Esq. Sullivan, Hill, Lewin, Rez & Engel 550 West C Street, Ste. 1500 San Diego, CA 92101-3540 | (619) 233-4100 (P) (619) 231-4372-(F) |
| 4 | | | |
| 5 | | | |
| 6 | U.S. Department of the Air Force - Edwards Air Force Base | Dale Murad, Esq. AFLSA/JACE 1501 Wilson Blvd., Ste. 629 Arlington, VA 22209-2403 | (703) 696-9166 (P) (703) 696-9184-(F) |
| 7 | | | |
| 8 | | | |
| 9 | Mark Santoro, Marygrace H. Santoro, The Marygrace H. Santoro Revocable Trust, Esfandiar Kadivar, Esfandiar Kadivar, as Trustee of the Kadivar Family Trust, Terry Munz, Barry Munz, Kathleen Munz, The Arnold R. and Reva R. Munz Family Trust, Morteza Foroughi, Morteza Foroughi, as Trustee of the Foroughi Family Trust, and Sharon Santoro Anderson | Craig A. Parton, Esq. Price, Postel & Parma LLP 200 East Carrillo St., Ste. 400 Santa Barbara, CA 93101-2190 | (805) 962-0011 (P) (805) 965-3978-(F) |
| 10 | | | |
| 11 | | | |
| 12 | | | |
| 13 | | | |
| 14 | | | |
| 15 | | | |
| 16 | | | |
| 17 | | | |
| 18 | Service Rock Products Corporation ("Owl Properties, Inc."); Richard Landfield | Marlene L. Allen-Hammarlund, Esq. Gresham, Savage, Nolan & Tilden, APC 3750 University Avenue, Ste. 250 Riverside, CA 92501-3335 | (951) 684-2171 (P) (951) 684-2150-(F) |
| 19 | | | |
| 20 | | | |
| 21 | Western Development | Charles M. Stringer, Esq. 5700 Wilshire Blvd., Ste. 330 Los Angeles, CA 90036 | (323) 936-9303 (P) (323) 930-9114-(F) |
| 22 | | | |
| 23 | Roman Catholic Archdiocese of Los Angeles | Allan J. Graf, Esq. Carlsmith Ball LLP 444 So. Flower Street, 9 th Floor Los Angeles, CA 90071-2901 | (213) 955-1200 (P) (213) 623-0032-(F) |
| 24 | | | |
| 25 | | | |
| 26 | ABC Williams, LP | Karl H. Knickmeyer, Esq. Law Office of Karl H. Knickmeyer 12011 San Vicente Blvd., Ste. 600 Los Angeles, CA 90049 | (310) 471-9970 (P) (310) 741-0482-(F) |
| 27 | | | |
| 28 | | | |

| | | | |
|----|--|--|--|
| 1 | Melinda E. Cameron and Keith E. Wales | Dennis G. Merenbach, Esq. Attorney at Law 225 East Carrillo Street, Ste. 202 Santa Barbara, CA 93101-2185 | (805) 963-4484 (P) (805) 966-7548-(F) |
| 2 | | | |
| 3 | | | |
| 4 | Palmdale Hills Property LLC | Edward J. Casey, Esq. Weston Benshoof Rochefort Rubalcava MacCuish LLP 333 So. Hope Street, 16 th Floor Los Angeles, CA 90071 | |
| 5 | | | |
| 6 | | | |
| 7 | Gertrude J. Van Dam and Delmar D. Van Dam | Scott K. Kuney, Esq. The Law offices of Young Wooldridge, LLP 1800 30 th Street, Fourth Floor Bakersfield, CA 93301-5298 | (661) 327-9661 (P) (661) 327-1087-(F) |
| 8 | | | |
| 9 | | | |
| 10 | Healy Enterprises, Inc. | Marlene L. Allen-Hammarlund, Esq. Gresham Savage Nolan & Tilden 3750 University Ave., Suite 250 Riverside, CA 92501-3335 | (951) 684-2171 (P) (951) 684-2150-(F) |
| 11 | | | |
| 12 | | | |
| 13 | Randall Blayney | Andrew D. Stein, Esq. Blanchard Stein & Stein 424 Bamboo Lane Los Angeles, CA 90012 | (213) 687-4004 (P) (213) 687-4007-(F) |
| 14 | | | |
| 15 | | | |
| 16 | Michael Higelmire and Donna Higelmire | Heather A. McConnell, Esq. 1346 S. Sierra Bonita Ave. Los Angeles, CA 90019 | (323) 938-1833 (P) (213) 910-8920-(F) |
| 17 | | | |
| 18 | A. David Kagon | A. David Kagon, Esq. (Ret.) 3099 Sumac Ridge Road Malibu, CA 90265 | (310) 456-2651 (P) (310) 456-3751-(F) |
| 19 | | | |
| 20 | | | |
| 21 | | | |
| 22 | | | |
| 23 | | | |
| 24 | | | |
| 25 | | | |
| 26 | | | |
| 27 | | | |
| 28 | | | |