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13 Attorneys for Cross-Defendants, Hi-Grade Materials, Co.;
14 Robar Enterprises, Inc.; and CJR, a general partnership

15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
16 **COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

17 **ANTELOPE VALLEY GROUNDWATER**
18 **CASES**

19 **Included Actions:**

20 Los Angeles County Waterworks District No.
21 40 v. Diamond Farming Co.,
22 Superior Court of California, County of Los
23 Angeles, Case No. BC 325201

24 Los Angeles County Waterworks District No.
25 40 v. Diamond Farming Co.,
26 Superior Court of California, County of Kern,
27 Case No. S-1500-CV-254-348

28 Wm. Bolthouse Farms, Inc. v. City of
Lancaster; Diamond Farming Co. v. City
Lancaster; Diamond Farminc Co. v. Palmdale
Water Dist.,
Superior Court of California, County of
Riverside, Case Nos. RIC 353 840, RIC 344
436, RIC 344 668

Judicial Council Coordination
No. 4408

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

**CROSS-DEFENDANTS HI-
GRADE MATERIALS CO.;**
ROBAR ENTERPRISES, INC.; and
CJR's DECLARATION IN
SUPPORT OF PROVE-UP FOR
PHASE VI TRIAL;
DECLARATION OF LORI
CLIFTON

Assigned to the
Honorable Jack Komar

DECLARATION OF LORI CLIFTON

1
2
3 1. I am over 18 years of age and competent to make a declaration under penalty of
4 perjury.

5 2. I am not personally a party to the case. I am, however, Vice President of
6 Planning and Development for Robar Enterprises, Inc. and Secretary/Treasurer for defendant
7 Hi-Grade Materials Co. I make this declaration under penalty of perjury regarding groundwater
8 usage.

9 3. Hi-Grade Materials Co. (Hi-Grade); Robar Enterprises, Inc. (Robar); and CJR;
10 are small, family businesses with common ownership. Hi-Grade produces construction
11 materials, namely ready-mix concrete, rock and sand and well as recycling asphalt and concrete
12 into base material. CJR owns real estate used in Hi-Grade's business operations. Robar is an
13 administrative holding company and the sole owner of Hi-Grade.

14 4. I am familiar with the real property owned by Hi-Grade, Robar and CJR that is
15 located within the Antelope Valley Area of Adjudication (AVAA). I am the custodian of the
16 records and files of Hi-Grade, Robar and CJR that pertain to land that is leased or owned by Hi-
17 Grade, Robar and CJR.

18 5. Hi-Grade, Robar and CJR, either alone or in some combination with each other,
19 own the following Assessor's Parcels:

- 20 (a) 3050-008-030 (formerly 3050-008-029), approximately 120 acres in size;
21 (b) 3051-013-026, 027, 042 and 043, together approximately 153 acres in size;
22 (c) 3050-009-59 (formerly 3050-009-10), approximately 26 acres in size;
23 (d) 3050-009-060 (formerly 3050-009-08), approximately 7 acres in size;
24 (e) 3050-030-047, approximately 6.5 acres in size;
25 (f) 3050-009-05, approximately 3.25 acres in size;
26 (g) 3050-009-09, approximately 3 acres in size;
27 (h) 3050-009-061 (formerly 3050-009-39), approximately 4 acres in size;
28 (i) 3050-009-06, approximately 5.5 acres in size; and
(j) 3050-009-062 (formerly 3050-009-38), approximately 3.5 acres in size;
(k) 3050-009-57 and 58, approximately 38 acres.
(l) 3137-010-002 and 026, approximately 16.6 acres in size

1 5. Hi-Grade's business is 100% dependent on groundwater pumping. Extracted
2 and recycled materials must be washed before they can properly be used as construction
3 materials. Ready mix concrete is composed primarily of water, rock, sand and cement.

4 6. Hi-Grade recycles as much water as possible for re-use in its business operations.
5 While plants owned by Hi-Grade's competitors in the Antelope Valley area sit on dirt, thus
6 limiting their water recycling capacity, Hi-Grade's plant sits on 18" of concrete. And the
7 concrete at the Hi-Grade plant is designed with grooves so that used water is channeled back
8 into the silt pond located in Hi-Grade's quarry. This concrete design ensures maximum
9 recycling capacity.

10 I declare under penalty of perjury under the laws of the State of California that the
11 foregoing is true and correct.

12 Executed this 7th day of October, 2015 at Hesperia, California.

13
14 
15 _____
16 Lori Clifton