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11 Attorney for Tejon Ranchcorp and Granite Construction Company

12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

13 **COUNTY OF LOS ANGELES - CENTRAL DISTRICT**

14 Coordination Proceeding
15 Special Title (Rule 1550(b))

Judicial Council Coordination
Proceeding No. 4408

16 ANTELOPE VALLEY GROUNDWATER
17 CASES

18 RICHARD A. WOOD, an individual, on behalf of
19 himself and all others similarly situated,

Case No. BC 509546

20 Plaintiff,

**OPPOSITION TO PETITION OF
RICHARD WOOD FOR INCLUSION
OF ADD-ON CASE IN THE
ANTELOPE VALLEY
GROUNDWATER CASES**

21 v.

22 A.V. MATERIALS, INC., et al.

23 Defendants.

24 **I. INTRODUCTION**

25 On June 14, 2013, TEJON RANCHCORP, GRANITE CONSTRUCTION COMPANY,
26 U.S. BORAX INC., DIAMOND FARMING COMPANY, CRYSTAL ORGANIC FARMS,
27 LLC, GRIMMWAY ENTERPRISES, INC., LAPIS LAND COMPANY, LLC, BOLTHOUSE
28 PROPERTIES, LLC, WM. BOLTHOUSE FARMS, INC., and the ANTELOPE VALLEY
GROUND WATER AGREEMENT ASSOCIATION (collectively "Objectors") gave notice
pursuant to California Rules of Court, Rule 3.544(b) of their opposition to the Petition of Richard

1 A. Wood for Inclusion of Add-On Case (Petition), *Wood v. A.V. Materials, Inc.*, Los Angeles
2 County Superior Court Case No. BC 509546 (Case BC 509546), in the Antelope Valley
3 Groundwater Cases, Judicial Council Coordinated Proceeding No. 4408. This is the Objectors'
4 Memorandum of Points and Authorities in opposition to the Petition.


5 This opposition relates solely to the adequacy of the Petition and shall not be deemed a
6 general appearance in Case BC 509546. The Objectors reserve the right to (a) oppose any
7 amended or revised petition, and (b) attack the proposed complaint when and if the summons and
8 complaint are properly served.

9
10 **II. POINTS AND AUTHORITIES**

11 Petitioner Richard Wood filed his Petition pursuant to California Rules of Court, Rule
12 3.544(a). A petition to "coordinate an add-on case must comply with the requirements of rules
13 3.520 through 3.523, . . ." (CRC, Rule 3.544(a).) Rule 3.520 requires that a petition be
14 supported by a memorandum and declarations showing, *inter alia*, (a) the names of the parties to
15 all included actions, and the name and address of each party's attorney of record, (b) whether the
16 summons and complaint have been served on all parties, (c) the status of each included action,
17 including the status of any pretrial or discovery motions or orders in that action, if known to the
18 petitioner, and (d) the facts relied upon to show that each included action meets the coordinated
19 standard specified in the Code of Civil Procedure section 4.04.1. (CRC, Rule 3.521(a).) The
20 Petition fails to meet these basic requirements and therefore should be denied.

21 Dated: June 26, 2013

KUHS & PARKER

22
23 By 
24 Robert G. Kuhs, Attorney for Tejon
25 Ranchcorp and Granite Construction
26 Company

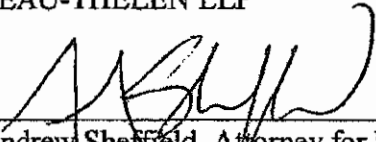
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Dated: June 20, 2013

LEBEAU-THELEN LLP

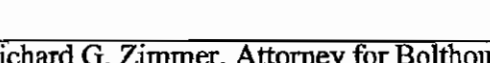
By


Andrew Sheffield, Attorney for Diamond Farming Company, Crystal Organic Farms, LLC, Grimnaway Enterprises, Inc. and Lapis Land Company, LLC

Dated: June __, 2013

CLIFFORD & BROWN

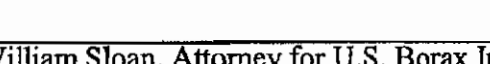
By


Richard G. Zimmer, Attorney for Bolthouse Properties, LLC and Wm. Bolthouse Farms, Inc.

Dated: June __, 2013

MORRISON & FOERSTER LLP


By


William Sloan, Attorney for U.S. Borax Inc.

Dated: June __, 2013

BROWNSTEIN HYATT FARBER
SCHRECK LLP

By


Bradley Herrema, Attorney for Antelope Valley Ground Water Agreement Association

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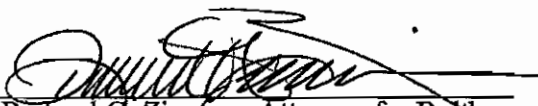
Dated: June __, 2013

LEBEAU-THELEN LLP

By _____
Andrew Sheffield, Attorney for Diamond
Farming Company, Crystal Organic Farms,
LLC, Grimmway Enterprises, Inc. and Lapis
Land Company, LLC

Dated: June 26TH, 2013

CLIFFORD & BROWN

By  _____
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Properties, LLC and Wm. Bolthouse
Farms, Inc.

Dated: June __, 2013

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SCHRECK LLP

By _____
Bradley Herrema, Attorney for Antelope
Valley Ground Water Agreement Association

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CLIFFORD & BROWN

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Properties, LLC and Wm. Bolthouse
Farms, Inc.

Dated: June 26, 2013

MORRISON & FOERSTER LLP

By William M. Sloan
William Sloan, Attorney for U.S. Borax Inc.

Dated: June ____, 2013

BROWNSTEIN HYATT FARBER
SCHRECK LLP

By _____
Bradley Herrema, Attorney for Antelope
Valley Ground Water Agreement Association

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Dated: June __, 2013

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By _____
William Sloan, Attorney for U.S. Borax Inc.

Dated: June 26, 2013

BROWNSTEIN HYATT FARBER
SCHRECK LLP

By  _____ *for Bradley Herrema*
Bradley Herrema, Attorney for Antelope
Valley Ground Water Agreement Association

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