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10 Attorneys for Granite Construction Company

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
12 **COUNTY OF LOS ANGELES - CENTRAL DISTRICT**

13 **ANTELOPE VALLEY GROUNDWATER**  
14 **CASES**

15 **INCLUDED ACTIONS:**

16 Los Angeles County Waterworks District No. 40  
17 v. Diamond Farming Co., Superior Court of  
18 California, County of Los Angeles, Case No. BC  
19 325201;

20 Los Angeles County Waterworks District No. 40  
21 v. Diamond Farming Co., Superior Court of  
22 California, County of Kern, Case No. S-1500-CV-  
23 254348;

24 Wm. Bolthouse Farms, Inc. v. City of Lancaster,  
25 Diamond Farming Co. v. Lancaster, Diamond  
26 Farming Co. v. Palmdale Water Dist., Superior  
27 Court of California, County of Riverside, Case  
28 No. RIC 353840, RIC 344436, RIC 344668

Rebecca Lee Willis v. Los Angeles County  
Waterworks District No. 40  
Superior Court of California, County of Los  
Angeles, Case No. BC 364553

Wood v. A.V. Materials, Inc., et al., Superior  
Court of California, County of Los Angeles, Case  
No. BC 509546

Little Rock Sand and Gravel, Inc. v. Granite  
Construction Co., Superior Court of California,  
County of Los Angeles, North Judicial District,  
Case No. MC026932

**Judicial Council Coordination No.**  
**4408**

Santa Clara Case No. 1-05-CV-049053  
Assigned to Honorable Jack Komar

**NOTICE OF MOTION AND**  
**MOTION BY GRANITE**  
**CONSTRUCTION COMPANY TO**  
**INTERPRET AND ENFORCE THE**  
**JUDGMENT AND TO PARTITION**  
**THE EXHIBIT 4 "Granite**  
**Construction Company (Little Rock**  
**Sand and Gravel, Inc.)"**  
**PRODUCTION RIGHT**

[Memorandum of Points and Authorities,  
and Appendix filed concurrently  
herewith.]

Date: June 20, 2018  
Time: 9:00 a.m.  
Dept. 222

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**I. NOTICE OF MOTION AND MOTION**

To Little Rock Sand and Gravel, Inc. ("LS&G") and its attorney of record:

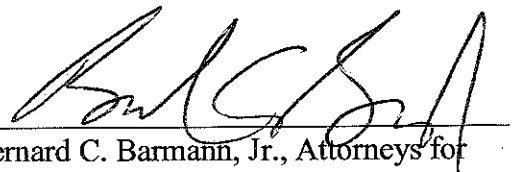
NOTICE IS HEREBY GIVEN that on June 20, 2018 at 9:00 a.m., or as soon thereafter as the matter may be heard, in Department 222 of the above-entitled court located at 111 North Hill Street, Los Angeles, California, 90012, Granite Construction Company ("Granite") will move this court for the following relief:

- (1) A determination whether LS&G is a "Stipulating Party" under the Stipulation for Entry of Judgment and Physical Solution and Judgment entered in the Antelope Valley Groundwater Cases;
- (2) If LS&G is a "Stipulating Party," a declaration that Granite and LS&G each have a 50% undivided interest in the 234 AF Production Right granted jointly to "Granite Construction Company (Little Rock Sand and Gravel, Inc.)," and
- (3) An order partitioning the 234 AF equally, 117 AF to Granite and 117 AF to LS&G.

This motion is based on this notice of motion and motion, on the points and authorities filed concurrently herewith, the Appendix of Declarations and Exhibits filed in support of the motion filed concurrently herewith, such oral and documentary evidence as may be presented at the hearing on the motion, and on the papers and records on file herein.

Dated: April 13, 2018

KUHS & PARKER

By   
Bernard C. Barmann, Jr., Attorneys for  
Granite Construction Company

**PROOF OF SERVICE**  
**STATE OF CALIFORNIA, COUNTY OF KERN**

I, Valerie Hanners, declare:

I am employed in the County of Kern, State of California. I am over the age of 18 and am not a party to the within action; my business address is Kuhs & Parker, 1200 Truxtun Avenue, Suite 200, Bakersfield, California 93301.

On April 13, 2018, I caused the foregoing document(s) described as **NOTICE OF MOTION AND MOTION BY GRANITE CONSTRUCTION COMPANY TO INTERPRET AND ENFORCE THE JUDGMENT AND TO PARTITION THE EXHIBIT 4 "Granite Construction Company (Little Rock Sand and Gravel, Inc.)" PRODUCTION RIGHT** to be served on the parties in this action, as follows:

All Parties in the Antelope Valley Groundwater Cases  
(Electronic service via Glotrans)

X (BY ELECTRONIC SERVICE) by serving the document(s) listed above via Antelope Valley Watermaster Electronic Document Service – (www.avwatermaster.org) c/o Glotrans, to all parties appearing on the electronic service list for the Antelope Valley Groundwater case. Electronic service is complete at the time of transmission. My electronic notification email address is [vhanners@kuhsparkerlaw.com](mailto:vhanners@kuhsparkerlaw.com)

\_\_\_ (BY U.S. MAIL) on April 13, 2018, at Bakersfield, California, pursuant to C.C.P. section 1013(a), I:

\_\_\_ deposited the sealed envelope with the United States Postal Service, with the postage fully prepaid.

\_\_\_ placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is place for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

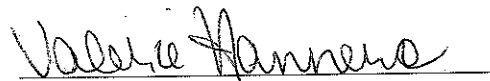
\_\_\_ (BY EMAIL TRANSMISSION) on April 13, 2018, at approximately p.m. to:

\_\_\_ (BY FACSIMILE TRANSMISSION) on April 13, 2018 at approximately \_\_\_ p.m., pursuant to Rule 2008 of the California Rules of Court. The telephone number of the sending facsimile machine was 661/322-2906. A transmission report (copy attached hereto) was properly issued by the sending facsimile machine, and the transmission was reported as completed and without error.

\_\_\_ (BY PERSONAL SERVICE) on April 13, 2018 pursuant to C.C.P. section 1011, I caused such envelope to be delivered by hand personally to the addressee(s):

\_\_\_ (BY OVERNIGHT COURIER) on April 13, 2018 pursuant to C.C.P. section 1013I(d), I caused such envelope with delivery fees fully prepared to be sent by Federal Express to **Theodore A. Chester, Jr. at Musick, Peeler & Garrett, LLP.**

\_\_\_ (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct, and that the foregoing was executed on April 13, 2018, in Bakersfield, California.

  
Valerie Hanners