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8 Attorneys for Cross-defendants
9 LITTLE ROCK SAND AND GRAVEL, INC. a
California Corporation, Roe 327.;
10 THE FRANK AND YVONNE LANE
1993 FAMILY TRUST, DATED MARCH 5, 1993,
11 AS RESTATED JULY 20, 2000, successor in interest to
FRANK A. LANE, ROE 612;
12 THE GEORGE AND CHARLENE LANE FAMILY TRUST,
successor in interest to George M. Lane, Roe 316;
13 MONTE VISTA BUILDING SITES, INC.,
a California Corporation; A.V. MATERIALS, INC.,
14 a California Corporation, ROE 9

15 SUPERIOR COURT OF THE STATE OF CALIFORNIA
16 FOR THE COUNTY OF LOS ANGELES

17
18 **ANTELOPE VALLEY**)
GROUNDWATER CASES)
19)
Included Actions:)
20)
Los Angeles County Waterworks District No.)
21 40 v. Diamond Farming Co. Superior Court of)
California County of Los Angeles, Case No.)
22 BC 325 201 Los Angeles County Waterworks)
2 District No. 40 v. Diamong Farming Co.)
23 Superior court of Califronia, County of Kern,)
Case No. S-1500-CV-254-348 Wm. Bolthouse)
24 Farms, Inc. V. City of Lancaster Diamong)
Farming Co. V. City of Lancaster Diamond)
25 Farming Co. V. Palmdale Water Dist. Superior)
Court of California, County of Riverside,)
26 consolidated actions, Case No. RIC 353 840,)
RIC 344 436, RIC 344 668)
27)
28

Judicial Council Coordination Proceeding No. 4408
Santa Clara Case No. 1-05-CV-049053
Assigned to The Honorable Jack Komar
LITTLE ROCK SAND AND GRAVEL, INC.'S, THE FRANK AND YVONNE LANE 1993 FAMILY TRUST'S, THE GEORGE AND CHARLENE LANE FAMILY TRUST'S, MONTE VISTA BUILDING SITES, INC.'S AND A.V. MATERIALS, INC.'S STATEMENT OF CLAIM OF WATER RIGHT IN RESPONSE TO COURT'S NOVEMBER 16, 2011 ORDER

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1 Cross-defendants LITTLE ROCK SAND AND GRAVEL, INC. a California Corporation, Roe
2 327; THE FRANK AND YVONNE LANE 1993 FAMILY TRUST, DATED MARCH 5, 1993, AS
3 RESTATED JULY 20, 2000, successor in interest to FRANK A. LANE, ROE 612; THE GEORGE
4 AND CHARLENE LANE FAMILY TRUST, successor in interest to George M. Lane, Roe 316;
5 MONTE VISTA BUILDING SITES, INC., a California Corporation; A.V. MATERIALS, INC.,
6 a California Corporation, ROE 9, hereby submit the following statement of water rights claim in
7 compliance with the court's order dated November 16, 2011:

8 These cross-defendants have been continuously participating in the mediation sessions in
9 Sacramento for several months. These responding parties are identified on the attachment entitled "List
10 of Parties" contained in the court's November 16, 2011 order by the following designations:

- 11 1. "Lane - 85th W and K-8"
- 12 2. "Lane - Fairmont"
- 13 3. "Lane - Godde Pass Property"
- 14 4. "Lane - The Ranch"
- 15 5. "Littlerock Sand and Gravel"

16 This Statement of Claim of Water Right is being submitted out of an abundance of caution to
17 prevent the omission of the claims of any of the parties identified herein. The active parties in this
18 litigation have been advised of the pumping claims of these parties during mediation, **and the pumping**
19 **amounts previously disclosed during mediation are not modified by this Statement of Claim.**

20 However, for the purpose of complying with the court's order, cross-defendants submit the
21 following information:

22 LITTLE ROCK SAND & GRAVEL, A.V. MATERIALS, INC., FRANK AND YVONNE
23 LANE 1993 FAMILY TRUST AND MONTE VISTA BUILDING SITES, INC.

- 24 1. A joint interest in 518.3 acre feet per year of groundwater pumping;
- 25 2. The amount of pumping associated with claim: 518.3 acre feet per year.
- 26 3. The properties are generally located at approximately 70th Street East and Avenue T, 80th
27 Street East and Avenue T and 80th Street East and Avenue S in the Little Rock area of the Antelope
28 Valley. The APN Nos. for these properties are 3050-022-010, 3050-022-014, 3050-010-006,

- 1 3050-010-016, 3050-028-015.
- 2 4. The basis for computation of the pumping is aggregate mining and processing activities.
- 3 5. The time frame for the pumping is 2000 to 2004.
- 4 LITTLE ROCK SAND & GRAVEL, INC., A.V. MATERIALS, INC., FRANK AND YVONNE
- 5 LANE 1993 FAMILY TRUST AND MONTE VISTA BUILDING SITES, INC.
- 6 1. A joint interest in 518.3 acre feet per year of groundwater pumping;
- 7 2. The amount of pumping associated with claim: 518.3 acre feet per year.
- 8 3. The properties are generally located at approximately 70th Street East and Avenue T, 80th
- 9 Street East and Avenue T and 80th Street East and Avenue S in the Little Rock area of the Antelope
- 10 Valley. The APN Nos. for these properties are 3050-011-009, 3051-008-007, 3051-008-005,
- 11 3051-008-010, 3051-008-011, 3051-007-008, 3051-007-015, 3051-005-029, 3051-006-015,
- 12 3042-023-002 and 3051-004-006, 3050-028-015, 3042-023-002, 3051-004-006.
- 13 4. The basis for computation of the pumping is aggregate mining and processing activities.
- 14 5. The time frame for the pumping is 2000 to 2004.
- 15 THE GEORGE AND CHARLENE LANE FAMILY TRUST
- 16 1. 1120 acre feet per year of groundwater pumping;
- 17 2. The amount of pumping associated with claim: 1120 acre feet per year.
- 18 3. The property is approximately 320 acres and is located at the northwest corner of 170th Street
- 19 West and Avenue A in the Rosamond area, APN Number 261-196-07-00-2.
- 20 4. The basis for computation of the pumping is calculations relating to alfalfa, farming activities
- 21 and crop duty.
- 22 5. The time frame for the pumping is 2000 to 2004.
- 23 THE FRANK AND YVONNE LANE 1993 FAMILY TRUST
- 24 1. 200 acre feet per year of groundwater pumping, plus 5.5 acre feet per year of AVEK water;
- 25 2. The amount of pumping associated with claim: 200 acre feet per year, plus 5.5 acre feet per
- 26 year of AVEK water.
- 27 3. The property is located at the corner of 60th Street West and Avenue L in the Quartz Hill area
- 28 of Lancaster and consists of approximately 80 acres. The APN Numbers for this property are

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1 3102-027-034, 3102-027-040, 3102-027-041, 3102-027-042, 3102-027-043.

2 4. The basis for computation of the pumping is calculations based on pasture and hay
3 production, livestock watering, incidental groundwater pumping relating to the residence and AVEK
4 records.

5 5. The time frame for the pumping is 2000 to 2004.

6 THE GEORGE AND CHARLENE LANE FAMILY TRUST

7 1. 25 acre feet per year of groundwater pumping;

8 2. The amount of pumping associated with claim: 25 acre feet per year.

9 3. The property is located in the vicinity of 85th Street West and Avenue K in Lancaster and
10 consists of approximately 20 acres. The APN Numbers are 3248-024-007, 3248-024-008,
11 3248-024-031, 3248-024-032.

12 4. The basis for computation of the pumping is calculations based on grazing activities.

13 5. The time frame for the pumping is 2000 to 2004.

14 THE GEORGE AND CHARLENE LANE FAMILY TRUST

15 1. 25 acre feet per year of groundwater pumping, plus 12.95 acre feet per year of AVEK water;

16 2. The amount of pumping associated with claim: 25 acre feet per year, plus 12.95 acre feet per
17 year of AVEK water.

18 3. The properties total 1200 acres and are located near N-8 and 70th Street West. The APN
19 Numbers for these properties are 3205-001-059, 3205-001-076, and 3205-001-078.

20 4. The basis for computation of the pumping is calculations based upon livestock watering,
21 grazing, fruit tree production and AVEK records.

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1 5.. The time frame for the pumping is 2000 to 2004.

2 DATED: December 6, 2011

POOLE & SHAFFERY, LLP

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By: 

JAMES W. LEWIS
Attorneys for Cross-defendants
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PROOF OF SERVICE

STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 400 S. Hope Street, Suite 1100, Los Angeles, CA 97001.

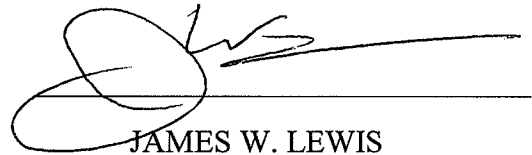
On December 6, 2011, I served the foregoing document described as:

LITTLE ROCK SAND AND GRAVEL, INC.'S, THE FRANK AND YVONNE LANE 1993 FAMILY TRUST'S, THE GEORGE AND CHARLENE LANE FAMILY TRUST'S, MONTE VISTA BUILDING SITES, INC.'S AND A.V. MATERIALS, INC.'S STATEMENT OF CLAIM OF WATER RIGHT IN RESPONSE TO COURT'S NOVEMBER 16, 2011 ORDER

X BY SANTA CLARA SUPERIOR COURT E-FILING IN COMPLEX LITIGATION
PURSUANT TO CLARIFICATION ORDER DATED OCTOBER 27, 2005.

X (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

DATED: December 6, 2011


JAMES W. LEWIS