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7 **Attorneys for Cross-defendants,**
8 HOLLIDAY ROCK CO., INC.,
9 successor in interest to
10 LITTLEROCK AGGREGATE CO., INC. dba
11 ANTELOPE VALLEY AGGREGATE, INC.;
12 THE FRANK AND YVONNE LANE 1993 FAMILY
13 TRUST, DATED MARCH 5, 1993, AS RESTATED
14 JULY 20, 2000, successor in interest to
15 FRANK A. LANE, ROE 612; THE GEORGE
16 AND CHARLENE LANE FAMILY TRUST,
17 Successor in interest to George M. Lane,
18 Roe 316; MONTE VISTA BUILDING SITES, INC.,
19 a California Corporation; A.V. MATERIALS, INC.,
20 a California Corporation, ROE 9; A.C. WARNACK,
21 as Trustee of the A.C. WARNACK TRUST

22 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

23 **FOR THE COUNTY OF LOS ANGELES**

24 ANTELOPE VALLEY GROUNDWATER CASES) Judicial Council Coordination No.
25) 4408
26 Included Actions:)
27) For filing purposes only:
28 Los Angeles County Waterworks) Santa Clara County Case No.
29 District No. 40 v. Diamond) 1-05-CV-049053
30 Farming Co. Superior Court of)
31 California County of Los Angeles,) [Assigned to the Honorable Jack
32 Case No. BC 325 201) Komar]
33)
34) NOTICE OF JOINDER AND JOINDER IN
35 ANTELOPE VALLEY GROUNDWATER
36 Los Angeles County Waterworks 2) AGREEMENT ASSOCIATION'S MOTION
37 District No. 40 v. Diamong) FOR PROTECTIVE ORDER BY HOLLIDAY
38 Farming Co. Superior court of) ROCK CO., INC., SUCCESSOR IN
39 Califronia, County of Kern, Case) INTEREST TO LITTLEROCK AGGREGATE
40 No. S-1500-CV-254-348) CO., INC. DBA ANTELOPE VALLEY
41) AGGREGATE, INC., THE FRANK AND
42 Wm. Bolthouse Farms, Inc. V. City) YVONNE LANE 1993 FAMILY TRUST,
43) DATED MARCH 5, 1993, AS RESTATED
44) JULY 20, 2000, THE GEORGE AND

1 of Lancaster Diamong Farming Co.) **CHARLENE LANE FAMILY TRUST, MONTE**
 V. City of Lancaster Diamond) **VISTA BUILDING SITES, INC., AND**
 2 Farming Co. V. Palmdale Water) **A.V. MATERIALS, INC. AND A.C.**
 Dist. Superior Court of) **WARNACK, AS TRUSTEE OF THE A.C.**
 3 California, County of Riverside,) **WARNACK TRUST**
 consolidated actions, Case No.) **Date: October 12, 2012**
 4 RIC 353 840, RIC 344 436, RIC 344) **Time: 9:00 a.m.**
 668) **Room: Dept. "1"**

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 6 PLEASE TAKE NOTICE that cross-defendants HOLLIDAY ROCK CO.,
 7 INC., successor in interest to LITTLE ROCK AGGREGATE CO., INC.
 8 dba ANTELOPE VALLEY AGGREGATE, INC., LITTLE ROCK AGGREGATE CO.,
 9 INC. dba ANTELOPE VALLEY AGGREGATE, INC., THE FRANK AND YVONNE
 10 LANE 1993 FAMILY TRUST, DATED MARCH 5, 1993, AS RESTATED JULY
 11 20, 2000, THE GEORGE AND CHARLENE LANE FAMILY TRUST, MONTE VISTA
 12 BUILDING SITES, INC., A.V. MATERIALS, INC. and A.C. WARNACK, as
 13 trustee of THE A.C. WARNACK TRUST, (collectively "Cross-
 14 defendants") hereby join in ANTELOPE VALLEY GROUNDWATER
 15 AGREEMENT ASSOCIATION's ("AGWA") motion for protective order
 16 regarding QUARTZ HILL WATER DISTRICT's written discovery, which
 17 is scheduled for hearing on October 12, 2012 at 9:00 a.m. in
 18 Department "1" of the Los Angeles Superior Court, Central
 19 District, located at 111 North Hill Street, Los Angeles, CA
 20 90012.

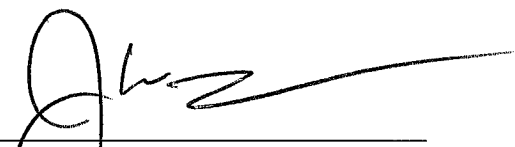
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The cross-defendants hereby adopt and incorporate by reference the notice, memorandum of points and authorities, the Declaration of Michael T. Fife, and the exhibits attached thereto in support. This notice of joinder is also based on the attached Declaration of James W. Lewis.

Dated: September 21, 2012

TAYLOR & RING

By: 

James W. Lewis
Attorneys for Cross-
Defendants HOLLIDAY ROCK
CO., INC., successor in
interest to LITTLE ROCK
AGGREGATE CO., INC. dba
ANTELOPE VALLEY
AGGREGATE, INC.; THE
FRANK AND YVONNE LANE
1993 FAMILY TRUST, DATED
MARCH 5, 1993, AS
RESTATED JULY 20, 2000,
successor in interest to
FRANK A. LANE, ROE 612;
THE GEORGE AND CHARLENE
LANE FAMILY TRUST,
Successor in interest to
George M. Lane, Roe 316;
MONTE VISTA BUILDING
SITES, INC., a
California Corporation;
A.V. MATERIALS, INC., a
California Corporation,
ROE 9; A.C. WARNACK,
as Trustee of the A.C.
WARNACK TRUST

1 DECLARATION OF JAMES W. LEWIS IN SUPPORT OF JOINDER IN AGWA'S

2 MOTION FOR PROTECTIVE ORDER

3 I, James W. Lewis, hereby declare as follows:

4 1. I am an attorney duly licensed to practice before all
5 of the courts of the State of California and I am an attorney at
6 the law offices of Taylor & Ring, LLP, counsel of record for
7 plaintiff JANICE H. in this matter. I am personally familiar
8 with the proceedings in this matter, including those facts and
9 circumstances stated herein. If called upon to do so, I could
10 and would competently testify under oath as to those matters set
11 forth in this declaration.

12 2. I make this declaration in support of the cross-
13 defendants HOLLIDAY ROCK CO., INC., successor in interest to
14 LITTLEROCK AGGREGATE CO., INC. dba ANTELOPE VALLEY AGGREGATE,
15 INC., LITTLEROCK AGGREGATE CO., INC. dba ANTELOPE VALLEY
16 AGGREGATE, INC., THE FRANK AND YVONNE LANE 1993 FAMILY TRUST,
17 DATED MARCH 5, 1993, AS RESTATED JULY 20, 2000, THE GEORGE AND
18 CHARLENE LANE FAMILY TRUST, MONTE VISTA BUILDING SITES, INC.,
19 A.V. MATERIALS, INC. and A.C. WARNACK, as trustee of THE A.C.
20 WARNACK TRUST's joinder in AGWA's motion for protective order
21 regarding QUARTZ HILL WATER DISTRICT's written discovery.

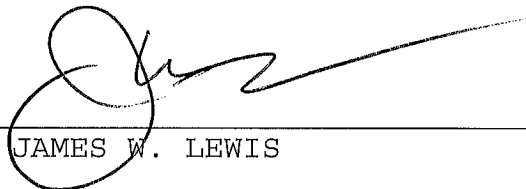
22 3. The discovery attached to the Declaration of Michael
23 Fife in support of AGWA's motion for protective order is the
24 same discovery that has been served upon my clients. Given the

1 broad scope of the discovery and the broad time frame that the
2 discovery covers, the burden, expense, and/or intrusiveness of
3 the discovery clearly outweighs the likelihood that the
4 information sought will lead to the discovery of admissible
5 evidence. [See Code of Civil Procedure section 2017.020] This
6 is especially true given that the scope of the Phase 4 Trial has
7 not yet been defined. The discovery at-issue is now due on
8 October 12, 2012.

9 **MEET AND CONFER**

10 4. On September 19, 2012 I left a message for Mr. Weeks
11 for the purpose of discussing whether he would provide my
12 clients with an extension of time to respond to the discovery
13 at-issue. Mr. Weeks returned my telephone call on September 21,
14 2012. During our telephone conversation, Mr. Weeks stated that
15 he was presently unable to provide my clients with an extension
16 of time to respond to the discovery at-issue.

17 I declare under penalty of perjury under the laws of the
18 State of California that the foregoing is true and correct.
19 Executed this 21st day of September, 2012, at Los Angeles,
20 California.

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