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7 **Attorneys for Cross-defendants,**  
8 LITTLE ROCK SAND AND GRAVEL, INC.,  
9 a California Corporation;  
10 THE GEORGE AND CHARLENE LANE FAMILY TRUST;  
11 THE FRANK AND YVONNE LANE 1993 FAMILY  
12 TRUST, DATED MARCH 5, 1993, AS RESTATED  
13 JULY 20, 2000; MONTE VISTA BUILDING SITES, INC.,  
14 a California Corporation; A.V. MATERIALS, INC.,  
15 a California Corporation;  
16 HOLLIDAY ROCK CO., INC.,  
17 successor in interest to  
18 LITTLE ROCK AGGREGATE CO., INC. dba  
19 ANTELOPE VALLEY AGGREGATE, INC.;  
20 LITTLE ROCK AGGREGATE CO., INC. dba  
21 ANTELOPE VALLEY AGGREGATE, INC.

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16 **ANTELOPE VALLEY GROUNDWATER CASES** ) **Judicial Council Coordination No.**  
17 Included Actions: ) **4408**  
18 Los Angeles County Waterworks ) **For filing purposes only:**  
19 District No. 40 v. Diamond ) **Santa Clara County Case No.**  
20 Farming Co. Superior Court of ) **1-05-CV-049053**  
21 California County of Los Angeles, ) **[Assigned to the Honorable Jack**  
22 Case No. BC 325 201 ) **Komar]**  
23 Los Angeles County Waterworks 2 ) **FURTHER OBJECTIONS TO**  
24 District No. 40 v. Diamong ) **DECLARATIONS AND STIPULATIONS IN**  
25 Farming Co. Superior court of ) **PHASE IV TRIAL**  
26 California, County of Kern, Case )  
27 No. S-1500-CV-254-348 )  
28 Wm. Bolthouse Farms, Inc. V. City )

1 of Lancaster Diamong Farming Co. )  
V. City of Lancaster Diamond )  
2 Farming Co. V. Palmdale Water )  
Dist. Superior Court of )  
3 California, County of Riverside, )  
consolidated actions, Case No. )  
4 RIC 353 840, RIC 344 436, RIC 344 )  
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5  
6 PLEASE TAKE NOTICE that these cross-defendants hereby  
7 object to the following portions of Granite Construction  
8 Company's Stipulation of Facts for Phase IV Trial, Granite's  
9 Response to Discovery Order for Phase 4 Trial, and the  
10 Declaration of William Taylor:

11 1. Paragraph 2 of Granite Construction Company's  
12 Stipulation of Facts for Phase IV Trial [See grounds below in  
13 paragraphs 3 and 4].

14 2. Paragraph 3 of Granite Construction Company's  
15 Stipulation of Facts for Phase IV Trial [See grounds below in  
16 paragraphs 3 and 4].

17 3. Paragraph 3 of the Declaration of William Taylor, in  
18 part, with respect to parcels listed in Exhibit A to the  
19 Declaration of William Taylor as parcels 1 through 5, on the  
20 grounds that Granite Construction Company does not own such  
21 parcels.

22 4. Paragraph 7 of the Declaration of William Taylor, in  
23 part, and Granite's Responses to Discovery for Phase 4 Trial, in  
24 part, on the grounds that Exhibit B to Granite's Response to

1 Discovery Order for Phase 4 Trial is inaccurate in that it  
2 states that "Operations on Parcels 1-10 function as a single  
3 unit, and ground water produced is shown as a total of all."  
4 This statement is only accurate with respect to parcels  
5 identified on Exhibit B as parcels 1-5.

6 On information and belief, William Taylor of Granite  
7 Construction has knowledge of these disputed facts. The deeds  
8 and the purchase/sale documents for the properties referenced in  
9 Granite's declaration and discovery responses contradict the  
10 disputed facts. These cross-defendants have scheduled the  
11 deposition of William Taylor on two prior occasions. However,  
12 to date, Granite Construction has unilaterally taken the  
13 deposition of William Taylor off-calendar. The last deposition  
14 was scheduled for May 2, 2013. Thus, additional facts may be  
15 forthcoming.

16 Dated: May 3, 2013

TAYLOR & RING

*James W. Lewis*

By: \_\_\_\_\_

James W. Lewis  
Attorneys for Cross-  
Defendants HOLLIDAY ROCK  
CO., INC., successor in  
interest to LITTLEROCK  
AGGREGATE CO., INC. dba  
ANTELOPE VALLEY  
AGGREGATE, INC.; THE  
FRANK AND YVONNE LANE  
1993 FAMILY TRUST, DATED  
MARCH 5, 1993, AS

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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; LITTLE  
ROCK SAND AND GRAVEL,  
INC.