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Attorneys for Cross-Defendants, SERVICE ROCK
PRODUCTS CORPORATION, as successor-in-
interest to Owl Properties, Inc. and SHEEP CREEK
WATER COMPANY, INC., and Cross-Defendants
and Cross-Complainants, A.V. UNITED MUTUAL
GROUP

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

Coordination Proceeding)	Judicial Council Coordination
Special Title (Rule 1550(b)))	Proceeding No. 4408
)	
ANTELOPE VALLEY GROUNDWATER)	Santa Clara Case No. 1-05-CV-049053
CASES)	Assigned to the Honorable Jack Komar
)	Department 17C
Including Actions:)	
)	CROSS-DEFENDANTS, SERVICE
Los Angeles County Waterworks District No.)	ROCK PRODUCTS CORPORATION'S
40 v. Diamond Farming Co.)	AND SHEEP CREEK WATER
Superior Court of California, County of Los)	COMPANY'S AND CROSS-
Angeles, Case No. BC 325 201)	DEFENDANTS AND CROSS-
)	COMPLAINANTS, A. V. UNITED
Los Angeles County Waterworks District No.)	MUTUAL GROUP'S:
40 v. Diamond Farming Co.)	
Superior Court of California, County of Kern,)	1. LIMITED JOINDER IN ANTELOPE
Case No. S-1500-CV-254-348)	VALLEY GROUNDWATER
)	AGREEMENT ASSOCIATION'S
Wm. Bolthouse Farms, Inc. v. City of)	(AGWA) CASE MANAGEMENT
Lancaster)	STATEMENT;
Diamond Farming Co. v. City of Lancaster)	
Diamond Farming Co. v. Palmdale Water Dist.)	2. JOINDER IN CROSS-
Superior Court of California, County of)	DEFENDANTS' (U. S. BORAX'S,
Riverside, consolidated actions, Case Nos. RIC)	BOLTHOUSE PROPERTIES, LLC'S
353 840, RIC 344 436, RIC 344 668)	AND WM. BOLTHOUSE FARMS,
)	INC.'S) OPPOSITION TO MOTION
AND RELATED ACTIONS.)	TO CONSOLIDATE FOR ALL
)	PURPOSES;
)	
)	3. JOINDER IN DIAMOND FARMING
)	COMPANY'S OBJECTION TO
)	HEARING ON MOTION TO
)	TRANSFER AND CONSOLIDATE
)	FOR ALL PURPOSES; AND

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4. JOINDER IN AGWA’S JOINDER IN
DIAMOND FARMING COMPANY’S
OBJECTION TO HEARING ON
MOTION TO TRANSFER AND TO
CONSOLIDATE; LIMITED
JOINDER IN FEDERAL
DEFENDANTS’ RESPONSE;
RESPONSE TO MOTION TO
CONSOLIDATE
Date: August 17, 2009
Time: 10:00 A.M.
Dept.: Santa Clara Sup. Ct., Dept. 17C
Judge: Hon. Jack Komar

Cross-Defendants, Service Rock Products Corporation (“Service Rock”) and Sheep Creek Water Company (“Sheep Creek”), and Cross-Defendants and Cross-Complainants, A. V. United Mutual Group (“A. V. United”) submit the following *Limited Joinder in Antelope Valley Groundwater Agreement Association (“AGWA”)’s Case Management Statement; Joinder in Cross-Defendants’ Opposition to Motion to Consolidate for All Purposes; Joinder In Diamond Farming Company’s Objection to Hearing on Motion to Transfer and Consolidate for all Purposes; and Joinder in AGWA’s Joinder in Diamond Farming Company’s Objection to Hearing on Motion to Transfer and to Consolidate; Limited Joinder in Federal Defendants’ Response; Response to Motion to Consolidate.*

**LIMITED JOINDER IN
AGWA’S CASE MANAGEMENT STATEMENT**

Service Rock, Sheep Creek and A. V. United join in the Case Management Statement (“CMS”) filed by the AGWA, except to the extent that the CMS requests that the Court limit the discussion to the pending *Motion by Plaintiff Richard Wood for Order Allocating Costs of Court-appointed Expert Witness* (the “Wood Class Motion”), *Motion by Plaintiff Rebecca Willis for Appointment of Expert Witness* (the “Willis Class Motion”), *Motion by City of Lancaster, et al. to Stay Proceedings for Six Months, or alternatively, Continue Trial Setting Conference* (the “Motion for Stay”), and *Motion by California Water Service Company for Limited Relief from Notice Requirements* (the “CWSC Motion”).

1 Service Rock, Sheep Creek and A. V. United do not join in the CMS to the extent that
2 AGWA does not request that the Court also address the *Motion to Consolidate for All Purposes*
3 (*"Motion for Consolidation"*), *Motion to Disqualify the Law Firm of Lemieux & O'Neil* (*"Motion*
4 *to Disqualify"*), *Motion to Dismiss the Public Water Suppliers' First Amended Cross-Complaint*
5 *filed on January 10, 2007* (*"Motion to Dismiss"*), and *Request to Amend the Exhibits to its*
6 *Amended Cross-Complaint* (*"Motion to Amend Exhibits"*), which are calendared for hearing on
7 August 17th, along with the *Wood Class Motion*, the *Willis Class Motion*, the *Motion for Stay*
8 and the *CWSC Motion*.

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10 **JOINDER IN CROSS-DEFENDANTS' OPPOSITION TO**
11 **MOTION TO CONSOLIDATE FOR ALL PURPOSES**

12 Service Rock, Sheep Creek and A. V. United join in Cross-Defendants' U. S. Borax,
13 Inc.'s, Bolthouse Properties, LLC's, and Wm. Bolthouse Farms, Inc.'s *Opposition to Motion to*
14 *Consolidate*.

15 Service Rock, Sheep Creek and A. V. United also submit that the Matrix of actions and
16 parties that the Court directed be prepared in connection with the *Motion to Disqualify* is equally
17 applicable to the *Motion to Consolidate*. Without an accurate picture of which parties have been
18 sued by which other parties, as to which causes of action, a clear and concise determination of
19 the effects of the requested *Motion to Consolidate* will not be possible.

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21 **JOINDER IN DIAMOND FARMING COMPANY'S OBJECTION**
22 **TO HEARING ON MOTION TO TRANSFER AND**
23 **CONSOLIDATE FOR ALL PURPOSES**

24 Service Rock, Sheep Creek and A. V. United also join in *Diamond Farming Company's*
25 *Objection to Hearing on Motion to Transfer and Consolidate for All Purposes*.

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1 **JOINDER IN AGWA’S JOINDER IN DIAMOND FARMING**
2 **COMPANY’S OBJECTION TO HEARING ON MOTION TO**
3 **TRANSFER AND TO CONSOLIDATE; LIMITED JOINDER IN**
4 **FEDERAL DEFENDANTS’ RESPONSE; RESPONSE TO MOTION**
5 **TO CONSOLIDATE**

6 Service Rock, Sheep Creek and A. V. United also join in AGWA’s *Joinder in Diamond*
7 *Farming Company’s Objection to Hearing on Motion to Transfer and to Consolidate; Limited*
8 *Joinder in Federal Defendants’ Response; Response to Motion to Consolidate.*

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10 Dated: August 13, 2009.

Respectfully Submitted,

11 GRESHAM SAVAGE NOLAN & TILDEN,
12 a Professional Corporation

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14 By: 

15 Michael Duane Davis
16 Marlene Allen-Hammarlund
17 Attorneys for SERVICE ROCK PRODUCTS
18 CORP., SHEEP CREEK WATER
19 COMPANY and A. V. UNITED MUTUAL
20 GROUP

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

Re: *ANTELOPE VALLEY GROUNDWATER CASES*
Los Angeles County Superior Court Judicial Council Coordinated
Proceedings No. 4408; Santa Clara County Superior Court Case No. 1-05-CV-049053

I am employed in the County of Riverside, State of California. I am over the age of 18 years and not a party to the within action; my business address is: 3750 University Avenue, Suite 250, Riverside, CA 92501-3335.

On August 13, 2009, I served the foregoing document(s) described as **CROSS-DEFENDANTS, SERVICE ROCK PRODUCTS CORPORATION'S AND SHEEP CREEK WATER COMPANY'S AND CROSS-DEFENDANTS AND CROSS-COMPLAINANTS, A.V. UNITED MUTUAL GROUP'S: 1. LIMITED JOINDER IN ANTELOPE VALLEY GROUNDWATER AGREEMENT ASSOCIATION'S (AGWA) CASE MANAGEMENT STATEMENT; 2. JOINDER IN CROSS-DEFENDANTS' (U. S. BORAX'S, BOLTHOUSE PROPERTIES, LLC'S AND WM. BOLTHOUSE FARMS, INC.'S) OPPOSITION TO MOTION TO CONSOLIDATE FOR ALL PURPOSES; 3. JOINDER IN DIAMOND FARMING COMPANY'S OBJECTION TO HEARING ON MOTION TO TRANSFER AND CONSOLIDATE FOR ALL PURPOSES; AND 4. JOINDER IN AGWA'S JOINDER IN DIAMOND FARMING COMPANY'S OBJECTION TO HEARING ON MOTION TO TRANSFER AND TO CONSOLIDATE; LIMITED JOINDER IN FEDERAL DEFENDANTS' RESPONSE; RESPONSE TO MOTION TO CONSOLIDATE** on the interested parties in this action in the following manner:

(X) **BY ELECTRONIC SERVICE** – I posted the document(s) listed above to the Santa Clara County Superior Court website, <http://www.scefilng.org>, in the action of the Antelope Valley Groundwater Cases,

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on August 13, 2009, at Riverside, California.


TERI D. GALLAGHER