Michael Duane Davis, SBN 093678 1 Marlene L. Allen-Hammarlund, SBN 26418 2 GRESHAM SAVAGE NOLAN & TILDEN, A Professional Corporation 3 3750 University Avenue, Suite 250 Riverside, CA 92501-3335 Telephone: (951) 684-2171 4 Facsimile: (951) 684-2150 5 Attorneys for Cross-Defendants, SERVICE ROCK PRODUCTS CORPORATION, as successor-in-6 interest to Owl Properties, Inc. and SHEEP CREEK WATER COMPANY, INC., Cross-Defendants and Cross-Complainants, A.V. UNITED MUTUAL GROUP, and unnamed Cross-Defendant ADAMS 8 BENNETT INVESTMENTS, LLC 9 SUPERIOR COURT OF THE STATE OF CALIFORNIA 10 IN AND FOR THE COUNTY OF LOS ANGELES 11 Judicial Council Coordination Coordination Proceeding Special Title (Rule 1550(b)) Proceeding No. 4408 12 ANTELOPE VALLEY GROUNDWATER 13 Santa Clara Case No. 1-05-CV-049053 **CASES** Assigned to the Honorable Jack Komar Department 17C 14 **Including Actions:** CASE MANAGEMENT STATEMENT 15 Los Angeles County Waterworks District No. OF CROSS-DEFENDANTS, SERVICE 40 v. Diamond Farming Co. ROCK PRODUCTS CORPORATION 16 Superior Court of California, County of Los AND SHEEP CREEK WATER COMPANY, CROSS-DEFENDANTS / 17 Angeles, Case No. BC 325 201 CROSS-COMPLAINANTS, A. V. Los Angeles County Waterworks District No. UNITED MUTUAL GROUP, AND 18 40 v. Diamond Farming Co. UNNAMED CROSS-DEFENDANT Superior Court of California, County of Kern, ADAMS BENNETT INVESTMENTS, 19 Case No. S-1500-CV-254-348 LLC 20 Wm. Bolthouse Farms, Inc. v. City of August 30, 2011 21 Lancaster Date: Diamond Farming Co. v. City of Lancaster Time: 8:00 A.M. 22 Diamond Farming Co. v. Palmdale Water Dist. Dept.: LA County Superior Court., Dept. 1 Superior Court of California, County of Judge: Hon. Jack Komar 23 Riverside, consolidated actions, Case Nos. RIC 353 840, RIC 344 436, RIC 344 668 24 AND RELATED ACTIONS. 25 26 /// 27 /// 28 ///

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TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

Cross-Defendants, SERVICE ROCK PRODUCTS CORPORATION ("SERVICE ROCK") and SHEEP CREEK WATER COMPANY, INC. ("SHEEP CREEK"), and Cross-Defendants / Cross-Complainants, A.V. UNITED MUTUAL GROUP ("A.V. UNITED"), and unnamed Cross-Defendant ADAMS BENNETT INVESTMENTS, LLC ("ADAMS BENNETT") by and through their attorneys of record, Gresham Savage Nolan & Tilden, APC, by Michael Duane Davis and Marlene L. Allen-Hammarlund, respectfully submit this narrative case management statement in advance of the August 30, 2011 Case Management Conference.

Cross-Defendants, **SERVICE ROCK** and **SHEEP CREEK**, and Cross-Defendants / Cross-Complainants, **A.V. UNITED** have participated in settlement conferences mediated by Justice Robie and will participate in the upcoming settlement conference, as well as unnamed Cross-Defendant **ADAMS BENNETT**. In preparation for the upcoming mediation sessions (scheduled for August 30 and 31, 2011), the parties were asked by Justice Robie to provide information regarding past water usage and groundwater pumping. Cross-Defendants, **SERVICE ROCK** and **SHEEP CREEK**, and Cross-Defendants / Cross-Complainants, **A.V. UNITED** have submitted this information per Justice Robie's request. Unnamed Cross-Defendant ADAMS BENNETT just filed its Answer on August 22, 2011 to Municipal Purveyors Cross-Complaint.

Cross-Defendants, **SERVICE ROCK** and **SHEEP CREEK**, and Cross-Defendants / Cross-Complainants, **A.V. UNITED** and unnamed Cross-Defendant, **ADAMS BENNETT** support continued settlement negotiations prior to scheduling future phases of trial or other litigation matters.

DATED: August 26, 2011 GRESHAM SAVAGE NOLAN & TIDEN, APC

By: M. allen

MICHAEL DUANE DAVIS, ESQ.

MARLENE L. ALLEN-HAMMARLUND, ESQ.
Attorneys for SERVICE ROCK PRODUCTS CORPORATION,
SHEEP CREEK WATER COMPANY, A.V. UNITED
MUTUAL GROUP, ADAMS PENNETT INVESTMENTS, LLC

MUTUAL GROUP, ADAMS BENNETT INVESTMENTS, LLC

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

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 26, 2011, I served the foregoing document(s) described as CASE CASE MANAGEMENT STATEMENT OF CROSS-DEFENDANTS, SERVICE ROCK PRODUCTS CORPORATION AND SHEEP CREEK WATER COMPANY, CROSS-DEFENDANTS / CROSS-COMPLAINANTS, A. V. UNITED MUTUAL GROUP, AND UNNAMED CROSS-DEFENDANT ADAMS BENNETT INVESTMENTS, LLC 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, <a href="http://www.scefiling.org">http://www.scefiling.org</a>, 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 26, 2011, at Riverside, California.

DINA SNIDER

GRESHAM SAVAGE

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