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6 Attorneys for Cross-Defendants and Cross-  
Complainants, ANTELOPE VALLEY UNITED  
MUTUAL GROUP; and Cross-Defendants,  
7 SERVICE ROCK PRODUCTS, LP, as successor-  
in-interest to Owl Properties, Inc., SHEEP CREEK  
8 WATER COMPANY, INC., unnamed Cross-  
Defendant ADAMS BENNETT INVESTMENTS,  
9 LLC and MIRACLE IMPROVEMENT  
CORPORATION, dba Golden Sands Mobile Home  
10 Park [ROE 1121]

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
12 **IN AND FOR THE COUNTY OF LOS ANGELES**  
13

14 Coordination Proceeding  
Special Title (Rule 1550(b))

) Judicial Council Coordination  
) Proceeding No. 4408  
)

15 **ANTELOPE VALLEY GROUNDWATER**  
16 **CASES**

) Santa Clara Case No. 1-05-CV-049053  
) Assigned to the Honorable Jack Komar  
) Department 17C  
)

17 Including Actions:

) **CASE MANAGEMENT STATEMENT**  
) **OF CROSS-DEFENDANTS / CROSS-**  
) **COMPLAINANTS, A. V. UNITED**  
) **MUTUAL GROUP; and CROSS-**  
) **DEFENDANTS, SERVICE ROCK**  
) **PRODUCTS, L.P., SHEEP CREEK**  
) **WATER COMPANY, UNNAMED**  
) **CROSS-DEFENDANT ADAMS**  
) **BENNETT INVESTMENTS, LLC. and**  
) **MIRACLE IMPROVEMENT**  
) **CORPORATION dba Golden Sands**  
) **Mobile Home Park [ROE 1121]**  
)

18 Los Angeles County Waterworks District No.  
40 v. Diamond Farming Co.  
19 Superior Court of California, County of Los  
Angeles, Case No. BC 325 201

20 Los Angeles County Waterworks District No.  
21 40 v. Diamond Farming Co.  
Superior Court of California, County of Kern,  
22 Case No. S-1500-CV-254-348

23 Wm. Bolthouse Farms, Inc. v. City of  
Lancaster

24 Diamond Farming Co. v. City of Lancaster  
Diamond Farming Co. v. Palmdale Water Dist.  
25 Superior Court of California, County of  
Riverside, consolidated actions, Case Nos. RIC  
26 353 840, RIC 344 436, RIC 344 668

) Date: November 15, 2011  
) Time: 9:00 A.M.  
) Dept.: LA County Superior Court., Dept. 1  
) Judge: Hon. Jack Komar  
)

27 **AND RELATED ACTIONS.**  
28

1 TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

2 Cross-Defendants / Cross-Complainants, **ANTELOPE VALLEY UNITED MUTUAL**  
3 **GROUP ("A.V. UNITED")**; and Cross-Defendants, **SERVICE ROCK PRODUCTS, L.P.**  
4 **("SERVICE ROCK")**, **SHEEP CREEK WATER COMPANY, INC. ("SHEEP CREEK")**,  
5 **MIRACLE IMPROVEMENT CORPORATION dba Golden Sands Mobile Home Park**  
6 **[ROE 1121] ("GOLDEN SANDS")** and unnamed Cross-Defendant **ADAMS BENNETT**  
7 **INVESTMENTS, LLC ("ADAMS BENNETT")**, by and through their attorneys of record,  
8 Gresham Savage Nolan & Tilden, APC, by Michael Duane Davis and Marlene L. Allen-  
9 Hammarlund, respectfully submit this narrative case management statement in advance of the  
10 November 15, 2011 Case Management Conference.

11 Cross-Defendants/Cross-Complainants, **A.V. UNITED** and Cross-Defendants **SERVICE**  
12 **ROCK, SHEEP CREEK, ADAMS BENNETT** and **GOLDEN SANDS** are participating in the  
13 Mediation Process before Justice Robie and will continue to participate in the Mediation Process,  
14 including the Mediation Session scheduled for December 7, 2011. The parties have also been  
15 engaging in additional meetings, as requested by Justice Robie, with another one set for  
16 November 18 at AVEK in Palmdale, to be followed by the next scheduled Mediation Session  
17 with Justice Robie in Sacramento on December 7, 2011. Cross-Defendants/Cross-Complainants,  
18 **A.V. UNITED** and Cross-Defendants **SERVICE ROCK, SHEEP CREEK** and **GOLDEN**  
19 **SANDS** have provided Justice Robie with information regarding their "base period" water usage  
20 and groundwater pumping. Recently appearing Cross-Defendant **ADAMS BENNETT** is in the  
21 process of determining the "base period" water usage and groundwater pumping for the  
22 properties that it has only recently acquired, and will report that information to Justice Robie as  
23 soon as it has been determined.

24 Cross-Defendants/Cross-Complainants, **A.V. UNITED** and Cross-Defendants **SERVICE**  
25 **ROCK, SHEEP CREEK, ADAMS BENNETT** and **GOLDEN SANDS** believe that the  
26 Mediation Process is causing considerable progress to be made toward the development of a  
27 comprehensive Physical Solution and Judgment, including the equitably agreed allocation of the  
28 safe yield amongst the participating parties. The Federal Defendants, the State of California and

1 a few other parties just memorialized their production information and settlement positions,  
2 which the parties participating in the Mediation process are now considering for integration into  
3 the table by which the allocation of the safe yield is proposed to be accomplished.

4 Cross-Defendants/Cross-Complainants, **A.V. UNITED** and Cross-Defendants **SERVICE**  
5 **ROCK, SHEEP CREEK, ADAMS BENNETT** and **GOLDEN SANDS** believe that no date  
6 should be set for the next phase of trial at this time. Should the Court determine to set a trial  
7 date, the parties will be compelled to refocus their energies on discovery and preparations for  
8 trial, and away from the Mediation Process that holds the greatest promise for an early and  
9 comprehensive resolution of the remaining issues pending before this Court.

10 Cross-Defendants/Cross-Complainants, **A.V. UNITED** and Cross-Defendants **SERVICE**  
11 **ROCK, SHEEP CREEK, ADAMS BENNETT** and **GOLDEN SANDS** respectfully request  
12 that the Court continue the Case Management Conference to a date following the next scheduled  
13 Mediation Session on December 7, 2011.

14  
15 DATED: November 11, 2011. GRESHAM SAVAGE NOLAN & TILDEN, APC

16  
17  
18 By: 

19 MICHAEL DUANE DAVIS, ESQ.  
20 MARLENE L. ALLEN-HAMMARLUND, ESQ.  
21 Attorneys for ANTELOPE VALLEY UNITED  
22 MUTUAL GROUP, SERVICE ROCK PRODUCTS,  
23 L.P., SHEEP CREEK WATER COMPANY, MIRACLE  
24 IMPROVEMENT CORPORATION dba Golden Sands  
25 Mobile Home Park and ADAMS BENNETT  
26 INVESTMENTS, LLC  
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**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 November 11, 2011, I served the foregoing document(s) described as **CASE MANAGEMENT STATEMENT OF CROSS-DEFENDANTS / CROSS-COMPLAINANTS, A. V. UNITED MUTUAL GROUP; and CROSS-DEFENDANTS, SERVICE ROCK PRODUCTS, L.P., SHEEP CREEK WATER COMPANY, UNNAMED CROSS-DEFENDANT ADAMS BENNETT INVESTMENTS, LLC. and MIRACLE IMPROVEMENT CORPORATION dba Golden Sands Mobile Home Park [ROE 1121]** 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 November 11, 2011, at Riverside, California.

  
DINA SNIDER