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7 Improvement Corporation, a California
8 corporation, dba Golden Sands Mobile Home
9 Park, aka Golden Sands Trailer Park, named
10 herein as ROE 1121

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

12 **IN AND FOR THE COUNTY OF LOS ANGELES**

13 Coordination Proceeding
14 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 17

17 Including Actions:

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

) **[PROPOSED] STIPULATION**
) **REGARDING THE DEPOSITION AND**
) **TRIAL TESTIMONY OF CROSS-**
) **DEFENDANT MIRACLE**
) **IMPROVEMENT CORPORATION, A**
) **CALIFORNIA CORPORATION, DBA**
) **GOLDEN SANDS MOBILE HOME**
) **PARK, AKA GOLDEN SANDS**
) **TRAILER PARK, NAMED HEREIN AS**
) **ROE 1121**

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

26 **Wm. Bolthouse Farms, Inc. v. City of**
27 **Lancaster**
28 **Diamond Farming Co. v. City of Lancaster**
29 **Diamond Farming Co. v. Palmdale Water**
30 **Dist.**

31 Superior Court of California, County of
32 Riverside, consolidated actions, Case Nos. RIC
33 353 840, RIC 344 436, RIC 344 668

34 **AND RELATED ACTIONS.**

1 This *Stipulation Regarding the Deposition and Trial Testimony of Cross-Defendant*
2 ***Miracle Improvement Corporation***, a California corporation, dba ***Golden Sands Mobile Home***
3 ***Park***, aka ***Golden Sands Trailer Park***, named herein as ROE 1121, (“Golden Sands”) is
4 submitted in connection with the deposition currently scheduled for Tuesday, January 22, 2013,
5 at 1:00 p.m. and the Phase 4 Trial which is currently scheduled for Monday, February 11, 2013,
6 in the above matter.

7 Golden Sands has provided, under penalty of perjury, the facts, information and
8 documents submitted to the Court and posted on the Court’s website on December 21, 2012 and
9 on January 15, 2013, including, but not limited to, the following:

10 1. Miracle Improvement Corp. (dba Golden Sands), which was formed on February
11 7, 1958, consists of fifteen individuals who own undivided shares in the company. Golden Sands
12 operates a mobile home park located at 2059 East Avenue I in Lancaster, California on an
13 approximately 9.5-acre parcel of real property identified as Los Angeles County Assessor’s
14 Parcel Number (“APN”) 3154-002-024.

15 Reference: *Cross-Defendant, Miracle Improvement Corporation, A California*
16 *Corporation, dba Golden Sands Mobile Home Park, aka Golden Sands Trailer*
17 *Park’s (verified) Information and Materials Responsive to December 12, 2012*
18 *Discovery Order for Phase 4 Trial (“Discovery Responses”), Paragraphs (“¶”)*
19 *I.1.a., I.1.b., I.3.a.iii.; I.3.b.i., I.3.b.ii., I.3.b.iii., I.3.c.i., I.3.c.ii., I.3.c.iii;*
20 *“Historical Perspective” overview of Golden Sands; Articles of Incorporation of*
21 *Miracle Improvement Corp., dated February 7, 1958 and amended on March 24,*
22 *2010; Golden Sands Mobile Home Park Unit Lot Locations Map (not to scale);*
23 *California Secretary of State Business Entity Detail for Miracle Improvement*
24 *Corp. (December 14, 2012); “Landowners Group” list of names; Cross-*
25 *Defendant, Miracle Improvement Corporation, A California Corporation, dba*
26 *Golden Sands Mobile Home Park, aka Golden Sands Trailer Park’s (verified)*
27 *First Supplemental Response to December 12, 2012 Discovery Order for Phase 4*

1 Trial (“Supplemental Responses”) ¶ I.3.b.; Chicago Title Insurance Company
2 Property Profile Reports for Los Angeles County APN 3154-002-024.

3 2. The subject property is known as Golden Sands Mobile Home Park and Golden
4 Sands Trailer Park. Golden Sands’ currently active well pump, has been metered at the well
5 head since August 2009, and serves 144 trailer lots within the Golden Sands mobile home park.

6 Reference: *Discovery Responses* ¶¶ I.1.b., I.1.c., I.1.l., I.3.a.iii; “Historical
7 Perspective” overview of Golden Sands.

8 3. Golden Sands owned one active groundwater well (“Well #2”) during the
9 measurement period of 2000-2004 and 2011-2012, located at 11W/7N-7N2 which was
10 completed in 1971 to replace the prior well (“Well #1”) constructed in 1958, located at 11W/7N-
11 7N1. Golden Sands has pumped groundwater consistently since its inception in 1958 for
12 domestic use at the mobile home park.

13 Reference: *Discovery Responses* ¶¶ I.1.c., I.1.f.; “Historical Perspective”
14 overview of Golden Sands.

15 4. Golden Sands groundwater production during the years 2000 to 2004 and 2011 to
16 2012, which was determined from the meter readings taken on Well #2, as well as from current
17 and historic occupancy data, is as follows:

- 18 a. **2000:** 42.9 acre feet.
19 b. **2001:** 43.1 acre feet.
20 c. **2002:** 44.1 acre feet.
21 d. **2003:** 46.1 acre feet.
22 e. **2004:** 48.8 acre feet.
23 f. **2011:** 46.7 acre feet
24 g. **2012:** 44.1 acre feet

25 Reference: *Discovery Responses* ¶¶ I.1.c., I.1.d., I.1.e., I.1.k., I.1.l., I.3.a.i.,
26 I.3.a.i.1., I.3.a.i.2., I.3.a.i.3., I.3.a.i.4., I.3.a.i.5., I.3.a.ii., I.3.a.iii., I.3.a.iv., I.3.a.v.,
27 I.3.a.vi., I.3.a.vii., I.3.a.viii., I.3.a.ix.; Volume of Water Pumped During 2009
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1 Golden Sands – Well #2 with Log of Water Pumped from Well #02; Volume of
2 Water Pumped During 2010 Golden Sands – Well #2 with Log of Water Pumped
3 from Well #02; Volume of Water Pumped During 2011 Golden Sands – Well #2
4 with Log of Water Pumped from Well #02; Volume of Water Pumped During
5 2012 Golden Sands – Well #2; Volume of Water Pumped Golden Sands – Well
6 #2 for Years 2011, 2010, and annualized 2009; History of groundwater pumped
7 by Golden Sands Mobile Home Park; “Historical Perspective” overview of
8 Golden Sands; Determining Historical Usage; Conservation Gains Beginning with
9 2006 and Water Pumped by Year Since 2000; 2011 First Notice of Extraction and
10 Diversion of Water; Well #2 Record of Drilling and DWR Well Index; Golden
11 Sands Occupancy Summary For Each Year (2000-2011); Monthly Occupancy
12 Detail Reports (2000-2004, 2009-2011); *Supplemental Responses* ¶¶ I.1.a.;
13 Volume of Water Pumped During 2012 Golden Sands – Well #2 (Entire 2012).

14 5. Golden Sands did not lease any property to anyone during the Base Period years
15 of 2000 to 2004 or the recent years of 2011 to 2012 beyond the rental of individual mobile home
16 trailers located on Golden Sands’ parcel, APN 3154-002-024.

17 Reference: *Discovery Responses* ¶ I.2.a.

18 6. Golden Sands did not import or acquire any imported water from the Antelope
19 Valley – East Kern Water Agency, Palmdale Water District, Littlerock Creek Irrigation District
20 or any other entity having rights to State Water Project water, during the Base Period years of
21 2000 to 2004 or the recent years of 2011 to 2012.

22 Reference: *Discovery Responses* ¶ III.1.d.

23 7. The groundwater claimed by Golden Sands is an overlying water right. Golden
24 Sands claims no other groundwater rights that are the subject of this Adjudication for purposes of
25 the Phase 4 Trial, and claims no return flows.

26 Reference: *Discovery Responses* ¶¶ I.1.f., I.1.j., III.1.a.

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IT IS SO STIPULATED.

GRESHAM SAVAGE NOLAN & TILDEN, PC

CHARLTON WEEKS LLP

By: _____
Bradley T. Weeks
Attorneys for Defendant and Cross-Complainant,
Quartz Hill Water District

1 Dated: January __, 2013.

BEST BEST & KRIEGER LLP

2
3 By: _____
4 Eric L. Garner
5 Jeffrey V. Dunn
6 Stefanie D. Hedlund
7 Attorneys for Cross-Complainant, Los Angeles
8 County Waterworks District No. 40

9 Dated: January __, 2013.

RICHARDS, WATSON & GERSHON

10 By: _____
11 Steven Orr
12 James L. Markman
13 Attorneys for Cross-Defendant, City of Palmdale

14 Dated: January __, 2013.

MURPHY & EVERTZ

15 By: _____
16 Douglas J. Evertz
17 Attorneys for Cross-Defendant, City of Lancaster
18 and Rosamond community Services District

19 Dated: January __, 2013.

20 By: _____
21 John Tootle
22 Attorneys for Cross-Defendant, California Water
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24 Dated: January __, 2013.

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25 By: _____
26 Wayne Lemieux
27 Attorneys for Littlerock Creek Irrigation District,
28 Palm Ranch Irrigation District, et al.

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Dated: January __, 2013.

LAGERLOF SENEAL GOSNEY & KRUSE

By: _____
Thomas Bunn III
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District

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