1 2 3 4 5 6	GRESHAM SAVAGE NOLAN & TILDEN, A Professional Corporation 3750 University Avenue, Suite 250 Riverside, CA 92501-3335 Telephone: (951) 684-2171 Facsimile: (951) 684-2150	ainant, Cross-
7 8 9 10	Defendants, ADAMS BENNETT INVESTMI LLC; MIRACLE IMPROVEMENT CORPORA dba GOLDEN SANDS MOBILE HOME PARI GOLDEN SANDS TRAILER PARK, named as 1121; ST. ANDREW'S ABBEY, INC., named as 623; SERVICE ROCK PRODUCTS, L.P.	ENTS, ATION K, aka s ROE s ROE
11	SUPERIOR COURT OF THI IN AND FOR THE COUR	
12 13	Coordination Proceeding Special Title (Rule 1550(b))	Judicial Council CoordinationProceeding No. 4408
14	ANTELOPE VALLEY GROUNDWATER)) Santa Clara Case No. 1-05-CV-049053
15 16	CASES Including Consolidated Actions:) Assigned to the Honorable Jack Komar) Department 17C)
17 18	Los Angeles County Waterworks District No. 40 v. Diamond Farming Co.	 CROSS-DEFENDANT, MIRACLE IMPROVEMENT CORP. DBA GOLDEN SANDS MOBILE HOME PARK AKA GOLDEN SANDS TRAILER PARK'S FIRST SUPPLEMENTAL RESPONSE
19 20	Los Angeles County Waterworks District No. 40 v. Diamond Farming Co. Superior Court of California, County of Kern,) TO DECEMBER 12, 2012 DISCOVERY) ORDER FOR PHASE 4 TRIAL
21	Case No. S-1500-CV-254-348) For Court's Use Only: Santa Clara County
22 23	Wm. Bolthouse Farms, Inc. v. City of Lancaster Diamond Farming Co. v. City of Lancaster) Case No. 1-05-CV-049053) (For E-Posting/E-Service Purposes Only)
23	Diamond Farming Co. v. Palmdale Water Dist.))
25	Superior Court of California, County of Riverside, consolidated actions, Case Nos. RIC 353 840, RIC 344 436, RIC 344 668)))
26 . 27	AND RELATED ACTIONS.)
GRESHAM SAVAGE ATTORNEYS AT LAW 3750 UNIVERSITY AVE STE. 250	-1	_
STE: 250 RIVERSIDE, CA 92501-3335 (951) 684-2171	CROSS-DEFENDANT, MIRACLE IMPROVEMENT COR GOLDEN SANDS TRAILER PARK'S FIRST SUPPLEMEN ORDER FOR PI	VTAL RESPONSE TO DECEMBER 12, 2012 DISCOVERY

TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

Cross-Defendant, MIRACLE IMPROVEMENT CORP. DBA GOLDEN SANDS
MOBILE HOME PARK AKA GOLDEN SANDS TRAILER PARK ("Golden Sands"), by
and through its attorneys of record, Gresham Savage Nolan & Tilden, PC, by Michael Duane
Davis, Marlene L. Allen-Hammarlund and Derek R. Hoffman, submits the following
supplemental information and materials, under penalty of perjury, in response to the December
12, 2012 Discovery Order for Phase 4 Trial ("*Discovery Order*"), issued by the Honorable Jack
Komar, Trial Judge.

Cross-Defendant, GOLDEN SANDS made a good faith effort to fully and accurately 9 10 respond to the categories of information required by the Discovery Order on December 21, 2012. However, due to the shortness of time between the issuance of the order and the degree of detail 11 required by the Discovery Order, Cross-Defendant, GOLDEN SANDS hereby supplements its 12 13 responses to include information and documents responsive to the *Discovery Order* which were obtained after the December 21, 2012 deadline and reserves the right to further supplement its 14 15 responses pursuant to the Code of Civil Procedure and this Court's December 12, 2012 Case Management Order. 16

Each supplemental response is identified by reference to specific responses and
documents provided in *Cross-Defendant*, *Miracle Improvement Corporation*, *A California Corporation, dba Golden Sands Mobile Home Park, aka Golden Sands Trailer Park's Information and Materials Responsive To December 12, 2012 Discovery Order For Phase 4 Trial* (the "Original Responses").

27 GRESHAM | SAVAGE ATTORNEYS AT LAW 3750 UNIVERSITY AVE STE 250 RIVERSIDE, CA 92501-3335 (951) 684-2171

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CROSS-DEFENDANT, MIRACLE IMPROVEMENT CORP. DBA GOLDEN SANDS MOBILE HOME PARK AKA GOLDEN SANDS TRAILER PARK'S FIRST SUPPLEMENTAL RESPONSE TO DECEMBER 12, 2012 DISCOVERY ORDER FOR PHASE 4 TRIAL

-2-

1	Original Response I.1.b. Ownership Information is <u>amended</u> as follows: "Title to the land is
2	held collectively in <i>undivided</i> shares by fifteen (15) individuals (the "Landowner's Group") who
3	are the shareholders of Miracle Improvement Corp. (dba) Golden Sands"
4	
5	Original Response I.3.a. Prima Facie Groundwater Production Materials is supplemented to
6	include the following additional documents:
7	• Volume of Water Pumped During 2012 Golden Sands – Well #2 (Entire 2012)
8	
9	Original Response I.3.b. Prima Facie Property Uses Materials is supplemented to include the
10	following additional documents:
11	Chicago Title Insurance Company Property Profile Report for Los Angeles County APN
12	3154-002-024
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27 gresham savage	
ATTORNEYS AT LAW 3750 UNIVERSITY AVE STE, 250	-3-
RIVERSIDE, CA 92501-3335 (951) 684-2171	CROSS-DEFENDANT, MIRACLE IMPROVEMENT CORP. DBA GOLDEN SANDS MOBILE HOME PARK AKA GOLDEN SANDS TRAILER PARK'S FIRST SUPPLEMENTAL RESPONSE TO DECEMBER 12, 2012 DISCOVERY ORDER FOR PHASE 4 TRIAL
	M949-000 ~ 1038390.1

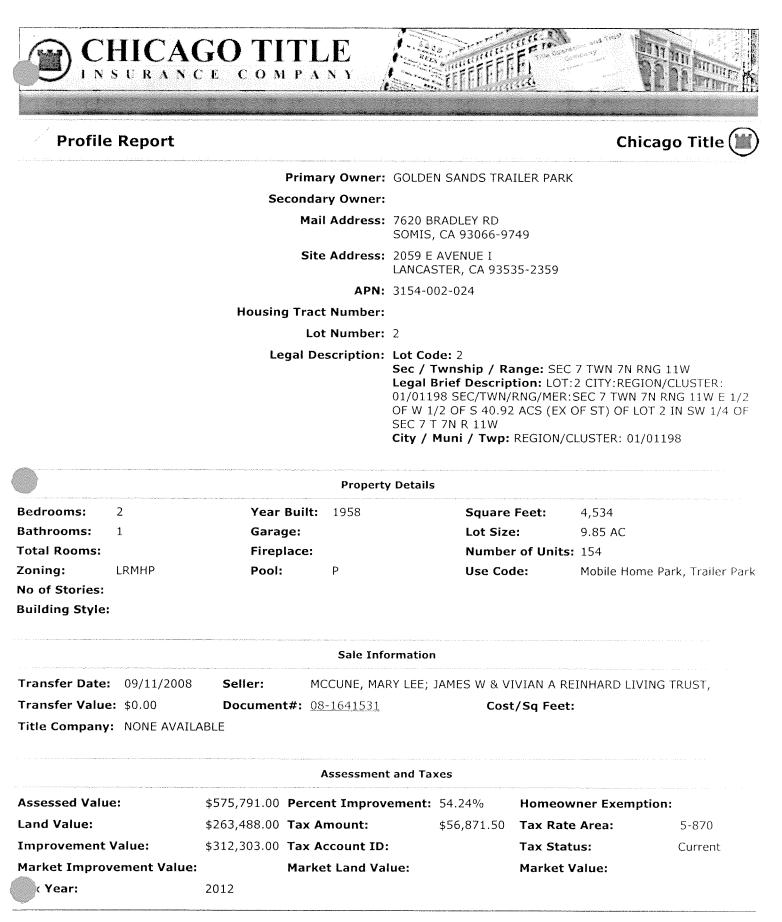
1	Verification by Authorized Individual:
2	
3	
4	HOME PARK AKA GOLDEN SANDS TRAILER PARK and have personal knowledge of
5	
6	If called to do so, I could and would competently testify to these facts under oath. I
7	
8	true and correct.
9	Executed this 15th day of January, 2013 at Corona, CA.
10	$\lambda \sim (\lambda \sim 1/2)$
11	Said Reining
12	DAVID REÍNHARD
13	Respectfully submitted,
14	GRESHAM SAVAGE NOLAN & TIDEN, PC
15	By: Atranal Cumuchus
16	MCHAEL DUANE DAVIS, ESQ. MARLENE L. ALLEN-HAMMARLUND, ESO.
17	DEREK R. HOFFMAN, ESQ. Attorneys for CROSS-DEFENDANT / CROSS-
18	COMPLAINANT, A. V. UNITED MUTUAL GROUP; and CROSS-DEFENDANTS, ADAMS BENNETT
19	INVESTMENTS, LLC, MIRACLE IMPROVEMENT CORPORATION dba GOLDEN SANDS MOBILE
20	HOME PARK, aka GOLDEN SANDS TRAILER PARK [ROE 1121], ST. ANDREW'S ABBEY, INC. [ROE
21	623], SERVICE ROCK PRODUCTS, L.P., and SHEEP CREEK WATER COMPANY, INC.
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ORESHAM SAVAGE	-4-
ATTORNEYS AT LAW 3750 UNIVERSITY AVE28 STE. 250 RIVERSIDE, CA 92501-3335	CROSS-DEFENDANT, MIRACLE IMPROVEMENT CORP. DBA GOLDEN SANDS MOBILE HOME PARK AKA
(951) 684-2171	GOLDEN SANDS TRAILER PARK'S FIRST SUPPLEMENTAL RESPONSE TO DECEMBER 12, 2012 DISCOVERY ORDER FOR PHASE 4 TRIAL
	M949-460 16085390, j

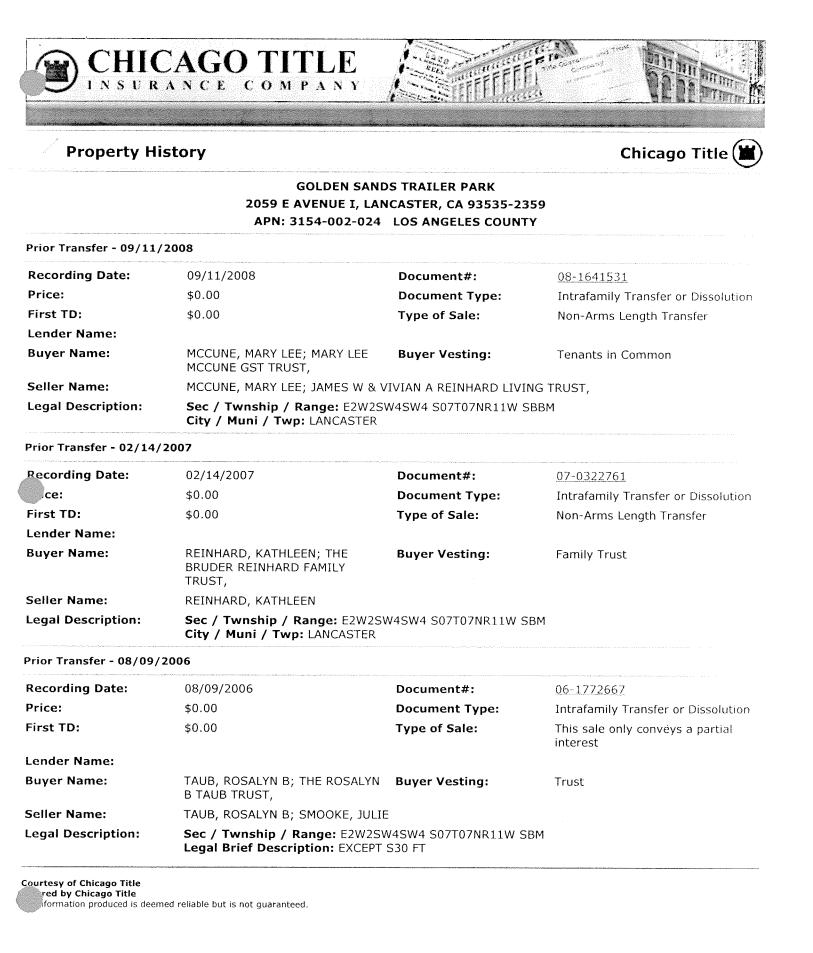
1	GOLDEN SANDS
1	Attachment I.3.a.i.
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GRESHAM SAVAGE	
ATTORNEYS AT LAW 3750 UNIVERSITY AVE STE. 250	
STE. 250 RIVERSIDE, CA 92501-3335 (951) 684-2171	CROSS-DEFENDANT, MIRACLE IMPROVEMENT CORP. DBA GOLDEN SANDS MOBILE HOME PARK AKA GOLDEN SANDS TRAILER PARK`S FIRST SUPPLEMENTAL RESPONSE TO DECEMBER 12, 2012 DISCOVERY ORDER FOR PHASE 4 TRIAL

VOLUME OF WATER PUMPED DURING 2012 GOLDEN SANDS -- WELL #2

Period of Measurement	Number of Days	Reading at Beginning of Period	Reading at End of Period	Gallons Pumped	Average Gallons per Day	Annualized Rate in Acre Feet
Column 1	2	3	4	5 [Column 4-3]	6 [Column 5/2]	7 [Col 6x365/325,851]
January <u>2012</u>	31	37,422,251	38,359,153	936,902	30,223	33.85
February	29	38,359,153	39,236,211	877,058	30,243	33.88
March	31	39,236,211	40,212,701	976,490	31,450	35.23
April	30	40,212,701	41,299,688	1,086,987	36,233	40.59
May	31	41,299,688	42,654,194	1,354,506	43,694	48.94
June	30	42,654,194	44,077,088	1,422,894	47,430	53.13
July	31	44,077,088	45,557,725	1,480,637	47,762	53.50
August	31	45,557,725	47,319,740	1,762,015	56,839	63.67
September	30	47,319,740	48,477,700	1,157,960	38,599	43.24
October	31	48,477,700	49,815,906	1,338,206	43,168	48.35
November	30	49,815,906	50,813,877	997,971	33,266	37.26
December	31	50,813,877	51,798,591	984,714	31,765	35.58
Entire <u>2012</u>	366	37,422,251	51,798,591	14,376,340	39,280	44.12







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Property His	story		Chicago Title (
Prior Transfer - 05/09/	2006		
Recording Date:	05/09/2006	Document#:	<u>06-1023704</u>
Price:	\$0.00	Document Type:	Intrafamily Transfer or Dissolution
First TD:	\$0.00	Type of Sale:	This sale only conveys a partial interest
Lender Name:			
Buyer Name:	TETLEY, JOHN A; JOHN A TETLEY REVOCABLE TRUST,	Buyer Vesting:	Revocable Trust
Seller Name:	TETLEY, JOHN A		
Legal Description:	Sec / Twnship / Range: E2W2SW	4SW4 S07T00NR11W SI	ЗМ
Prior Transfer - 04/13/	2006		
Recording Date:	04/13/2006	Document#:	06-0813804
Price:	\$0.00	Document Type:	Intrafamily Transfer or Dissolution
First TD:	\$0.00	Type of Sale:	This sale only conveys a partial interest
der Name:			
Buyer Name:	REINHARD, KATHLEEN; REINHARD, DAVID JAMES	Buyer Vesting:	N/A
Seller Name:	REINHARD, KATHLEEN; KAIN, MAURA		
Legal Description:	Sec / Twnship / Range: E2W2SW4SW4 S07T07NR11W SBM City / Muni / Twp: LANCASTER		
Prior Transfer - 04/13/2	2006		
Recording Date:	04/13/2006	Document#:	06-0813803
Price:	\$0.00	Document Type:	Intrafamily Transfer or Dissolutio
First TD:	\$0.00	Type of Sale:	This sale only conveys a partial interest
ender Name:			
Buyer Name:	REINHARD, KATHLEEN; KAIN, MAURA	Buyer Vesting:	Living Trust
Seller Name:	REINHARD, KATHLEEN; KAIN, MAUF	A	
Legal Description:	Sec / Twnship / Range: E2W2SW4SW4 S07T07NR11W SBM		





Property H	listory		Chicago Title 🕻
Prior Transfer - 11/12	2/2002		
Recording Date:	11/12/2002	Document#:	02-2692208
Price:	\$0.00	Document Type:	Intrafamily Transfer or Dissolutio
First TD:	\$0.00	Type of Sale:	Non-Arms Length Transfer
Lender Name:			
Buyer Name:	MOORE, ELIZABETH SENGER; ELIZABETH SENGER MOORE REVOCABLE LIVING,	Buyer Vesting:	Revocable Living Trust
Seller Name:	MOORE, ELIZABETH SENGER		
Legal Description:	Sec / Twnship / Range: E2W2	2SW4SW4 S07T07NR11W S	BM
Prior Transfer - 08/16	/1999		
Recording Date:	08/16/1999	Document#:	99-1539042
Price:	\$27,500.00	Document Type:	Grant Deed
First TD:	\$0.00	Type of Sale:	Full-Computed from Transfer Tax
ender Name:			
/er Name:	MCINTOSH, JAMES F	Buyer Vesting:	Married Man as his sole and separate property
Seller Name:	SHINN, MARGARET MARIE		
Legal Description:	Legal Brief Description: E 1/2 OF W 1/2 OF S 40.92 ACS (EX OF ST) OF LOT 2 IN SW 1/4 OF SEC 7 7N R 11W City / Muni / Twp: LANCASTER		
Prior Transfer - 09/25	/1998		αλακαλαδάδιο πότα η μαγγρ ηματικό πότης _τ αματη θημορού η ματά τη πότη τους του του του του του του του του του τ
Recording Date:	09/25/1998	Document#:	98-1746237
Price:	\$0.00	Document Type:	Gift Deed
First TD:	\$0.00	Type of Sale:	This sale only conveys a partial interest
ender Name:			
Buyer Name:	WHITEHEAD, JAMES H; WHITEHEAI ELIZABETH ANN	D, Buyer Vesting:	Family Trust
Seller Name:	THORNTON, ELIZABETH S; THE THO	ORNTON FAMILY TRUST,	
egal Description:	Legal Brief Description: E 1/2 OF W 1/2 OF S 40.92 ACS (EX OF ST) OF LOT 2 IN SW 1/4 OF SEC 7		



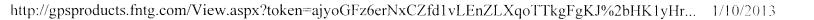




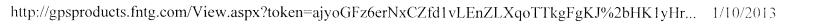


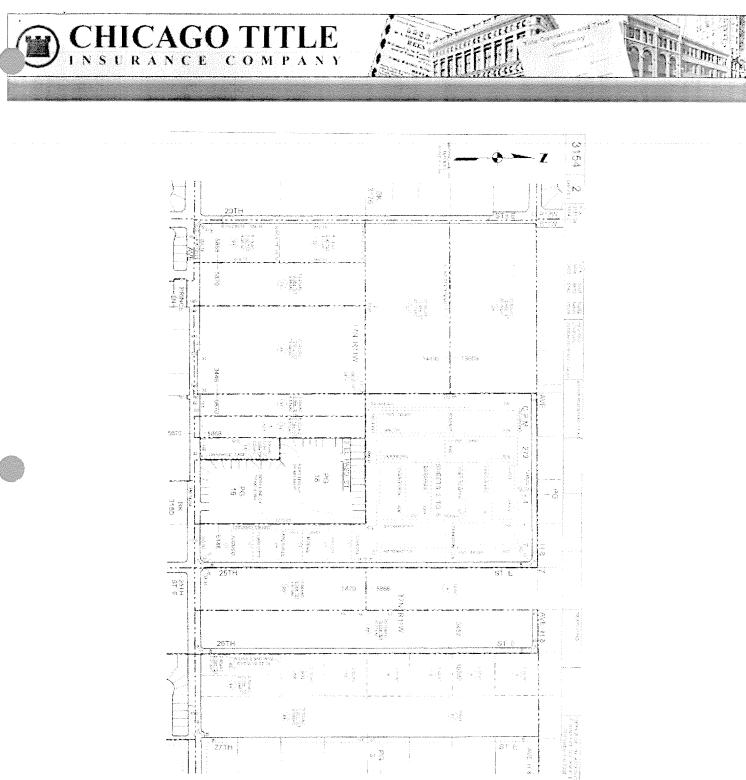


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Property History			Chicago Title 🕻	
Prior Transfer - 12/04	/1996			
Recording Date:	12/04/1996	Document#:	<u>96-1948364</u>	
Price:	\$0.00	Document Type:	Gift Deed	
First TD:	\$0.00	Type of Sale:		
Lender Name:				
Buyer Name:	WILSON, LILLIAN E	Buyer Vesting:	N/A	
Seller Name:	SHINN, MARGARET MARIE			
Legal Description:	Legal Brief Description: E 1/ 7N R 11W City / Muni / Twp: LANCAST		OF ST) OF LOT 2 IN SW 1/4 OF SEC 7	
Prior Transfer - 09/23	/1996	ar anala Ari a banda mananana mana dan mar 🛥 mada na mang na mang na mang pangapang panan ang pang na mang na pang n		
Recording Date:	09/23/1996	Document#:	96-1561428	
Price:	\$0.00	Document Type:	Quit Claim Deed	
First TD:	\$0.00	Type of Sale:		
ender Name:				
ender Name: ver Name:	MCINTOSH, JAMES F	Buyer Vesting:	N/A	
yer Name:	MCINTOSH, JAMES F CHESLEY, LOUISE D PREWI		N/A	
yer Name: Seller Name:	CHESLEY, LOUISE D PREWI			
yer Name: Seller Name: Legal Description:	CHESLEY, LOUISE D PREWI Sec / Twnship / Range: I	TT; MURPHY, CAROL		
yer Name: Seller Name: Legal Description: Prior Transfer - 09/23	CHESLEY, LOUISE D PREWI Sec / Twnship / Range: I	TT; MURPHY, CAROL		
yer Name: Seller Name: Legal Description: Prior Transfer - 09/23 Recording Date:	CHESLEY, LOUISE D PREWI Sec / Twnship / Range: I /1996	TT; MURPHY, CAROL E2W2SW4SW4 S07T07NR11W SE	ЗМ	
yer Name: Seller Name: Legal Description: Prior Transfer - 09/23 Recording Date: Price:	CHESLEY, LOUISE D PREWI Sec / Twnship / Range: 1 /1996 09/23/1996	TT; MURPHY, CAROL E2W2SW4SW4 S07T07NR11W SE Document#:	ЗМ <u>96-1561427</u>	
yer Name: Seller Name: Legal Description: Prior Transfer - 09/23 Recording Date: Price: First TD:	CHESLEY, LOUISE D PREWI Sec / Twnship / Range: 1 /1996 09/23/1996 \$0.00	TT; MURPHY, CAROL E2W2SW4SW4 S07T07NR11W SE Document#: Document Type:	ЗМ <u>96-1561427</u>	
yer Name: Seller Name: Legal Description: Prior Transfer - 09/23 Recording Date: Price: First TD: Lender Name:	CHESLEY, LOUISE D PREWI Sec / Twnship / Range: 1 /1996 09/23/1996 \$0.00	TT; MURPHY, CAROL E2W2SW4SW4 S07T07NR11W SE Document#: Document Type:	ЗМ <u>96-1561427</u>	
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Property Hi	story		Chicago Title (
Prior Transfer - 08/16/	1996		
Recording Date:	08/16/1996	Document#:	96-1328078
Price:	\$27,500.00	Document Type:	Grant Deed
First TD:	\$0.00	Type of Sale:	Full-Computed from Transfer Ta
Lender Name:			
Buyer Name:	MCINTOSH, JAMES F	Buyer Vesting:	Married Man as his sole and separate property
Seller Name:	CHESLEY, LOUISE D PREWITT; M	URPHY, CAROL	
Legal Description:	Sec / Twnship / Range: E2W2SW4SW4 S07T07NR11W SBM		
Prior Transfer - 08/16/	1996	ан с на пака и порад страна станица средна учинани и на средна дан с дан с дан с то с с то с на с на с на след Т	
Recording Date:	08/16/1996	Document#:	<u>96-1328077</u>
Price:	\$0.00	Document Type:	Grant Deed
First TD:	\$0.00	Type of Sale:	
Lender Name:			
² uyer Name:	MCINTOSH, JAMES F	Buyer Vesting:	Married Man as his sole and separate property
Seller Name:	CHESLEY, LOUISE D PREWITT; MI	URPHY, CAROL	
Legal Description:	Sec / Twnship / Range: E2W2SW4SW4 S07T07NR11W SBM		
Prior Transfer - 11/21/	1995		
Recording Date:	11/21/1995	Document#:	<u>95-1863865</u>
Price:	\$0.00	Document Type:	Gift Deed
irst TD:	\$0.00	Type of Sale:	
ender Name:			
Buyer Name:	WELTY, GWEN HALVORSON; LEWIS, SUZANNE HALVORSON	Buyer Vesting:	Tenants in Common
Seller Name:	HALVORSON, MARGARET A; EDW	IN HALVORSON TRUST,	
Legal Description:	Sec / Twnship / Range: E2W2S	W4SW4 S07T07NR11W SE	ЗМ







Page 13 of 13

1	PROOF OF SERVICE STATE OF CALIFORNIA, COUNTY OF RIVERSIDE
2 3	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
5	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.
7 8 9	On January, 2013, I served the foregoing document(s) described as CROSS-DEFENDANT, MIRACLE IMPROVEMENT CORP. DBA GOLDEN SANDS MOBILE HOME PARK AKA GOLDEN SANDS TRAILER PARK'S FIRST SUPPLEMENTAL RESPONSE TO DECEMBER 12, 2012 DISCOVERY ORDER FOR PHASE 4 TRIAL on the interested parties in this action in the following manner:
10 11	(X) BY ELECTRONIC SERVICE – I posted the document(s) listed above to the Santa Clara County Superior Court website, <u>http://www.scefiling.org</u> , in the action of the Antelope Valley Groundwater Cases,
12 13	I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.
13	Executed on January 15, 2013, at Riverside, California.
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16	DINA M. SNIDER
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GRESHAM SAVAGE Attorneys at Law 3750 University Ave28	-7-
STE. 250 RIVERSIDE, CA 92501-3335 (951) 684-2171	CROSS-DEFENDANT, MIRACLE IMPROVEMENT CORP. DBA GOLDEN SANDS MOBILE HOME PARK AKA GOLDEN SANDS TRAILER PARK'S FIRST SUPPLEMENTAL RESPONSE TO DECEMBER 12, 2012 DISCOVERY ORDER FOR PHASE 4 TRIAL