

Michael Duane Davis, SBN 093678
Marlene L. Allen-Hammarlund, SBN 26418
Derek R. Hoffman, SBN 285784
GRESHAM SAVAGE NOLAN & TILDEN, PC
3750 University Avenue, Suite 250
Riverside, CA 92501-3335
Telephone: (951) 684-2171
Facsimile: (951) 684-2150

Attorneys for Cross-Defendant/Cross-Complainant,
A.V. UNITED MUTUAL GROUP; and Cross-
Defendants, ADAMS BENNETT INVESTMENTS,
LLC; MIRACLE IMPROVEMENT CORPORATION
dba GOLDEN SANDS MOBILE HOME PARK, aka
GOLDEN SANDS TRAILER PARK, named as ROE
1121; ST. ANDREW'S ABBEY, INC., named as ROE
623; SERVICE ROCK PRODUCTS, L.P.; and
SHEEP CREEK WATER COMPANY, INC.

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

Coordination Proceeding
Special Title (Rule 1550(b))

) Judicial Council Coordination
) Proceeding No. 4408

**ANTELOPE VALLEY
GROUNDWATER CASES**

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

Including Consolidated Actions:

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

) **CROSS-DEFENDANTS, ADAMS BENNETT
INVESTMENTS, LLC; MIRACLE
IMPROVEMENT CORPORATION dba
GOLDEN SANDS MOBILE HOME PARK,
aka GOLDEN SANDS TRAILER PARK
[ROE 1121]; ST. ANDREW'S ABBEY, INC.
[ROE 623]; SERVICE ROCK PRODUCTS,
L.P.; AND SHEEP CREEK WATER**

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

) **COMPANY, INC.'S JOINDER IN
ANTELOPE VALLEY-EAST KERN
WATER AGENCY'S OPPOSITION TO
RICHARD WOOD'S PETITION FOR
INCLUSION OF ADD-ON CASE IN
ANTELOPE VALLEY GROUNDWATER
CASES**

**Wm. Bolthouse Farms, Inc. v. City of
Lancaster
Diamond Farming Co. v. City of
Lancaster
Diamond Farming Co. v. Palmdale
Water Dist.**

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

) For Court's Use Only:
) Santa Clara County
) Case No. 1-05-CV-049053
) (For E-Posting/E-Service Purposes Only)

AND RELATED ACTIONS.

1 **TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:**

2 Cross-Defendants, **ADAMS BENNETT INVESTMENTS, LLC; MIRACLE**
3 **IMPROVEMENT CORPORATION dba Golden Sands Mobile Home Park, aka Golden**
4 **Sands Trailer Park**, named as ROE 1121; **ST. ANDREW'S ABBEY, INC.**, named as ROE
5 623; **SERVICE ROCK PRODUCTS, L.P.**; and, **SHEEP CREEK WATER COMPANY,**
6 **INC.**, by and through their attorneys of record, Gresham Savage Nolan & Tilden, PC, by
7 Michael Duane Davis and Marlene L. Allen-Hammarlund, hereby join in the *Notice of*
8 *Opposition to Richard Wood's Petition for Inclusion of Add-On Case in Antelope Valley*
9 *Groundwater Cases* that was filed by the Antelope Valley–East Kern Water Agency on June 18,
10 2013.

11 Further, Cross-Defendant Sheep Creek Water Company, a mutual water company, should
12 be excluded as a named party to the [proposed] Complaint, pursuant to language on page 8,
13 paragraph 17, lines 2-3, which states ...“The Class also excludes all persons and entities to the
14 extent their properties are connected to a municipal water system, public utility, or **mutual water**
15 **company....**”

16 DATED: June 19, 2013

Respectfully submitted,

17 GRESHAM SAVAGE NOLAN & TIDEN, PC
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By:

20 MICHAEL DUANE DAVIS, ESQ.
21 MARLENE L. ALLEN-HAMMARLUND, ESQ.
22 DEREK R. HOFFMAN, ESQ.
23 Attorneys for CROSS-DEFENDANT / CROSS-
24 COMPLAINANT, A. V. UNITED MUTUAL GROUP;
25 and CROSS-DEFENDANTS, ADAMS BENNETT
26 INVESTMENTS, LLC, MIRACLE IMPROVEMENT
27 CORPORATION dba GOLDEN SANDS MOBILE
28 HOME PARK, aka GOLDEN SANDS TRAILER PARK
[ROE 1121], ST. ANDREW'S ABBEY, INC. [ROE
623], SERVICE ROCK PRODUCTS, L.P., and SHEEP
CREEK WATER COMPANY, INC.

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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 June 19, 2013, I served the foregoing document(s) described as **CROSS-DEFENDANTS, ADAMS BENNETT INVESTMENTS, LLC; MIRACLE IMPROVEMENT CORPORATION dba GOLDEN SANDS MOBILE HOME PARK, aka GOLDEN SANDS TRAILER PARK [ROE 1121]; ST. ANDREW'S ABBEY, INC. [ROE 623]; SERVICE ROCK PRODUCTS, L.P.; AND SHEEP CREEK WATER COMPANY, INC.'S JOINDER IN ANTELOPE VALLEY-EAST KERN WATER AGENCY'S OPPOSITION TO RICHARD WOOD'S PETITION FOR INCLUSION OF ADD-ON CASE IN ANTELOPE VALLEY GROUNDWATER CASES** 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.scefiling.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 June 19, 2013, at Riverside, California.


DINA M. SNIDER