

Michael Duane Davis, SBN 093678
Marlene L. Allen-Hammarlund, SBN 126418
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, ADAMS
BENNETT INVESTMENTS, LLC; Cross-
Defendants and Cross-Complainants, ANTELOPE
VALLEY UNITED MUTUALS GROUP
[comprised of Antelope Park Mutual Water Co.,
Aqua-J Mutual Water Co., Averydale Mutual Water
Co., Baxter Mutual Water Co., Bleich Flat Mutual
Water Co., Colorado Mutual Water Co., Eldorado
Mutual Water Co., Evergreen Mutual Water Co.,
Land Projects Mutual Water Co., Landale Mutual
Water Co., Shadow Acres Mutual Water Co.,
Sundale Mutual Water Co., Sunnyside Farms
Mutual Water Co., Tierra Bonita Mutual Water Co.,
West Side Park Mutual Water Co. and White Fence
Farms Mutual Water Co.]; and Cross-Defendants,
MIRACLE IMPROVEMENT CORPORATION
DBA GOLDEN SANDS MOBILE HOME PARK,
AKA GOLDEN SANDS TRAILER PARK,
NAMED AS ROE 1121; SAINT ANDREW'S
ABBAY, INC., NAMED AS ROE 623; SERVICE
ROCK PRODUCTS, L.P.; and SHEEP CREEK
WATER COMPANY

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

Coordination Proceeding
Special Title (Rule 1550(b))

**ANTELOPE VALLEY GROUNDWATER
CASES**

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

**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

) Judicial Council Coordination
) Proceeding No. 4408
)

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

) **MASTER TRIAL BRIEF OF**
) **ADAMS BENNETT INVESTMENTS,**
) **LLC, ANTELOPE PARK MUTUAL**
) **WATER CO., AQUA-J MUTUAL**
) **WATER CO., AVERYDALE MUTUAL**
) **WATER CO., BAXTER MUTUAL**
) **WATER CO., BLEICH FLAT MUTUAL**
) **WATER CO., COLORADO MUTUAL**
) **WATER CO., ELDERADO MUTUAL**
) **WATER CO., EVERGREEN MUTUAL**

1 **Wm. Bolthouse Farms, Inc. v. City of**
2 **Lancaster**
3 **Diamond Farming Co. v. City of Lancaster**
4 **Diamond Farming Co. v. Palmdale Water**
5 **Dist.**

6 Superior Court of California, County of
7 Riverside, consolidated actions, Case Nos. RIC
8 353 840, RIC 344 436, RIC 344 668

) **WATER CO., LAND PROJECTS**
) **MUTUAL WATER CO., LANDALE**
) **MUTUAL WATER CO., MIRACLE**
) **IMPROVEMENT CORPORATION DBA**
) **GOLDEN SANDS MOBILE HOME**
) **PARK, AKA GOLDEN SANDS**
) **TRAILER PARK [ROE 1121], SAINT**
) **ANDREW'S ABBEY, INC. [ROE 623],**
) **SERVICE ROCK PRODUCTS, L.P.,**
) **SHADOW ACRES MUTUAL WATER**
) **CO., SHEEP CREEK WATER**
) **COMPANY, SUNDALE MUTUAL**
) **WATER CO., SUNNYSIDE FARMS**
) **MUTUAL WATER CO., TIERRA**
) **BONITA MUTUAL WATER CO., WEST**
) **SIDE PARK MUTUAL WATER CO.**
) **AND WHITE FENCE FARMS MUTUAL**
) **WATER CO.**

) **PROVE-UP**
) Trial Date: September 28, 2015
) Time: 10:00 A.M.
) Dept.: Dept. 1, Los Angeles
) Judge: Hon. Jack Komar

14 **AND RELATED ACTIONS.**

15
16 **TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:**

17 Cross-Defendant, ADAMS BENNETT INVESTMENTS, LLC ("Adams Bennett");
18 Cross-Defendants and Cross-Complainants, ANTELOPE VALLEY UNITED MUTUALS
19 GROUP [comprised of Antelope Park Mutual Water Co., Aqua-J Mutual Water Co., Averydale
20 Mutual Water Co., Baxter Mutual Water Co., Bleich Flat Mutual Water Co., Colorado Mutual
21 Water Co., Eldorado Mutual Water Co., Evergreen Mutual Water Co., Land Projects Mutual
22 Water Co., Landale Mutual Water Co., Shadow Acres Mutual Water Co., Sundale Mutual Water
23 Co., Sunnyside Farms Mutual Water Co., Tierra Bonita Mutual Water Co., West Side Park
24 Mutual Water Co. and White Fence Farms Mutual Water Co.] ("Members of the AV United
25 Mutuals Group"); and Cross-Defendants, MIRACLE IMPROVEMENT CORPORATION DBA
26 GOLDEN SANDS MOBILE HOME PARK, AKA GOLDEN SANDS TRAILER PARK,
27 NAMED AS ROE 1121 ("Golden Sands"); SAINT ANDREW'S ABBEY, INC., NAMED AS

1 ROE 623 ("St. Andrew's"); SERVICE ROCK PRODUCTS, L.P. ("Service Rock"); and SHEEP
2 CREEK WATER COMPANY ("Sheep Creek") by and through their attorneys of record,
3 Michael Duane Davis, Esq., Marlene L. Allen-Hammarlund, Esq. and Derek R. Hoffman, Esq. of
4 Gresham Savage Nolan & Tilden, PC, hereby submit this Master Trial Brief for the Phase 6
5 [Prove-Up] Trial proceedings.

6 Adams Bennett, Members of the AV United Mutuals Group, Golden Sands, St. Andrew's,
7 Service Rock and Sheep Creek have participated in the process of developing and have executed
8 the Stipulation for Entry of Judgment and Physical Solution, and in so doing have demonstrated
9 and reassert their support for the entry of [Proposed] Judgment and Physical Solution. In support
10 of the [Proposed] Judgment and Physical Solution, Adams Bennett, Members of the AV United
11 Mutuals Group, Golden Sands, St. Andrew's, Service Rock and Sheep Creek have also filed
12 separate Trial Briefs in Support of the Phase 6 Prove-Up Trial to present the evidence necessary
13 for the Court to make the necessary findings vis-à-vis Adams Bennett's, Members of the AV
14 United Mutuals Group's, Golden Sands', St. Andrew's, Service Rock's and Sheep Creek's rights
15 and interests under the [Proposed] Judgment and Physical Solution.

16 Adams Bennett, Members of the AV United Mutuals Group, Golden Sands, St. Andrew's,
17 Service Rock and Sheep Creek join with the other Stipulating Parties in requesting that the Court
18 find that the [Proposed] Judgment and Physical Solution meets all requirements for the Court to
19 order that it be entered as the Judgment and Physical Solution in these coordinated and
20 consolidated proceedings.

21 Dated: September 22, 2015

GRESHAM SAVAGE NOLAN & TILDEN, PC

22
23
24 By: 

MICHAEL DUANE DAVIS, ESQ.
MARLENE L. ALLEN-HAMMARLUND, ESQ.
DEREK R. HOFFMAN, ESQ.
Attorneys for CROSS-DEFENDANT / CROSS-
COMPLAINANT, A. V. UNITED MUTUAL
GROUP [comprised of Antelope Park Mutual
Water Co., Aqua-J Mutual Water Co., Averydale

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Mutual Water Co., Baxter Mutual Water Co.,
Bleich Flat Mutual Water Co., Colorado Mutual
Water Co., Eldorado Mutual Water Co.,
Evergreen Mutual Water Co., Land Projects
Mutual Water Co., Landale Mutual Water Co.,
Shadow Acres Mutual Water Co., Sundale
Mutual Water Co., Sunnyside Farms Mutual
Water Co., Tierra Bonita Mutual Water Co.,
West Side Park Mutual Water Co. and White
Fence Farms Mutual Water Co.]; and 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], WHITE FENCE FARMS PRODUCTS,
L.P., and SHEEP CREEK WATER COMPANY,
INC.

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PROOF OF SERVICE
STATE OF CALIFORNIA, COUNTY OF SAN BERNARDINO

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 San Bernardino, State of California. I am over the age of 18 years and not a party to the within action; my business address is: 550 East Hospitality Lane, Suite 300, San Bernardino, CA 92408-4205.

On September 22, 2015, I served the foregoing document(s) described as **MASTER TRIAL BRIEF OF ADAMS BENNETT INVESTMENTS, LLC, ANTELOPE PARK MUTUAL WATER CO., AQUA-J MUTUAL WATER CO., AVERYDALE MUTUAL WATER CO., BAXTER MUTUAL WATER CO., BLEICH FLAT MUTUAL WATER CO., COLORADO MUTUAL WATER CO., ELDORADO MUTUAL WATER CO., EVERGREEN MUTUAL WATER CO., LAND PROJECTS MUTUAL WATER CO., LANDALE MUTUAL WATER CO., MIRACLE IMPROVEMENT CORPORATION DBA GOLDEN SANDS MOBILE HOME PARK, AKA GOLDEN SANDS TRAILER PARK [ROE 1121], SAINT ANDREW'S ABBEY, INC. [ROE 623], SERVICE ROCK PRODUCTS, L.P., SHADOW ACRES MUTUAL WATER CO., SHEEP CREEK WATER COMPANY, SUNDALE MUTUAL WATER CO., SUNNYSIDE FARMS MUTUAL WATER CO., TIERRA BONITA MUTUAL WATER CO., WEST SIDE PARK MUTUAL WATER CO. AND WHITE FENCE FARMS MUTUAL WATER CO.** 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 September 22, 2015, at San Bernardino, California.



DINA M. SNIDER