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Attorneys for Cross-Defendants/Cross-Complainants,  
ANTELOPE VALLEY UNITED MUTUALS 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  
ABBNEY, 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

) **OBJECTION TO [PROPOSED] ORDER  
DENYING MOTION FOR ORDER  
INTERPRETING JUDGMENT  
REGARDING WATERMASTER  
FORMATION**

**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

) Judge: Hon. Jack Komar, Judge

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

) HEARING DATE: MAY 25, 2016  
) TIME: 9:00 a.m.  
) DEPT: Room 222  
) Los Angeles Superior Court  
) 111 N. Hill Street  
) Los Angeles, California

**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

) *Filed Concurrently with [Moving Parties'  
Proposed] Order Denying Motion For Order  
Interpreting Judgment Regarding Watermaster  
Formation*

AND RELATED ACTIONS.

1 Cross-Defendants / Cross-Complainants, ANTELOPE VALLEY UNITED MUTUALS  
2 GROUP and Cross-Defendants, ADAMS BENNETT INVESTMENTS, LLC and SERVICE  
3 ROCK PRODUCTS, L.P. (collectively, “Moving Parties”) object to the *[Proposed] Order*  
4 *Denying Motion for Order Interpreting Judgment Regarding Watermaster Formation* that was  
5 filed by counsel for Los Angeles County Sanitation Districts Nos. 14 and 20 on May 27, 2016  
6 [Court Document No. 11433] (“Opposing Parties’ Proposed Order”).

7 While Moving Parties are in general agreement with Opposing Parties’ Proposed Order,  
8 Moving Parties assert that it does not fully conform with the order issued orally by the Court at  
9 the May 25, 2016 hearing on Moving Parties’ *Motion for Order Interpreting Judgment*  
10 *Regarding Watermaster Formation* (“Hearing”). At the Hearing, the Court was clear that the  
11 formation of the Watermaster Board is entirely subject to Court’s oversight and approval.  
12 Despite the Court’s clear directives, counsel for AVEK and counsel for Los Angeles County  
13 Sanitation Districts Nos. 14 and 20 (two of the Opposing Parties) suggested that the Court’s  
14 approval of the initial Watermaster composition and the procedures used to elect representatives  
15 for the two landowner Watermaster seats was not necessary. The Court reaffirmed, as an  
16 exercise of the Court’s authority to oversee the implementation of the Judgment, that both the  
17 results and the procedures used to elect the landowner Watermaster seats must be reviewed and  
18 approved by the Court, which shall be the subject of the hearing ordered by the Court to occur on  
19 June 30, 2016. Nevertheless, Opposing Parties’ Proposed Order omits any reference to the  
20 requirement that Court must review and approve the procedures used to elect the two landowner  
21 Watermaster seats. It also fails to include the Court’s order that the Moving and Opposing  
22 Parties shall meet and confer prior the June 30, 2016 hearing to attempt to reach agreement on  
23 the election procedures used. Finally, Opposing Parties’ Proposed Order does not reflect the  
24 appearance of all counsel for Moving Parties at the Hearing.

25 Moving Parties are separately filing “[*Moving Parties’ Proposed*] *Order Denying Motion*  
26 *for Order Interpreting Judgment Regarding Watermaster Formation*,” (“Moving Parties’  
27 Proposed Order”) for the Court’s consideration and use as an alternative to Opposing Parties’

1 Proposed Order. For the convenience of the Court, attached as Exhibit "A" to this Objection is a  
2 redline version of Moving Parties' Proposed Order showing the differences and proposed  
3 changes.

4 DATED: May 31, 2016.

Respectfully submitted,

5 GRESHAM SAVAGE NOLAN & TILDEN, PC

6  
7 By:

8 MICHAEL DUANE DAVIS, ESQ.  
9 DEREK R. HOFFMAN, ESQ.  
10 Attorneys for A. V. UNITED MUTUALS GROUP,  
11 ADAMS BENNETT INVESTMENTS, LLC, and  
12 SERVICE ROCK PRODUCTS, L.P.  
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# **Exhibit A**

SUPERIOR COURT OF CALIFORNIA

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

Included 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

**[MOVING PARTIES' PROPOSED]  
ORDER DENYING MOTION FOR  
ORDER INTERPRETING  
JUDGMENT REGARDING  
WATERMASTER FORMATION**

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

DATE: May 25, 2016  
TIME: 9:00 A.M.  
PLACE: 111 N. Hill Street  
Los Angeles, CA  
DEPT.: 222

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.

The Motion of Cross-Defendants / 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., El Dorado 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., Inc.]; and  
Cross-Defendants, ADAMS BENNETT INVESTMENTS, LLC and SERVICE ROCK  
PRODUCTS, L.P. (collectively, "Moving Parties") to Interpret Judgment Regarding

1 Watermaster Formation ("Motion") came on regularly for hearing on May 25, 2016, at 9:00 a.m.  
2 in Department 222 of the above-entitled Court, the Honorable Jack Komar, presiding.

3 Moving Parties appeared by Michael Duane Davis and Derek Hoffman of Gresham  
4 Savage Nolan & Tilden. Appearances for opposing parties are reflected in the Court's Minute  
5 Order for this hearing. A Court Reporter was present.

6 Having considered the papers filed in support of and in opposition to the Motion and the  
7 arguments of counsel, the Court finds that the Motion seeks an advisory opinion and is  
8 **HEREBY DENIED.**

9 **IT IS FURTHER ORDERED** that on June 30, 2016, at 10:00 am in Los Angeles,  
10 Department to be determined, a hearing shall be held to report on the procedures used and results  
11 of the election for the two Landowner Watermaster seats, to resolve any challenges to the  
12 conduct, procedures used or results of the election for the two Landowner Watermaster seats, and  
13 to confirm all Watermaster Board members. The Moving and Opposing Parties to the Motion  
14 shall meet and confer to attempt to reach agreement on the election procedures to be used.

15  
16 DATED: \_\_\_\_\_

17 HON. JACK KOMAR

18 JUDGE OF THE SUPERIOR COURT  
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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 May 31, 2016, I served the foregoing document(s) described **OBJECTION TO [PROPOSED] ORDER DENYING MOTION FOR ORDER INTERPRETING JUDGMENT REGARDING WATERMASTER FORMATION** 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 May 31, 2016 at San Bernardino, California.

Dina Snider

DINA M. SNIDER