1 2 3 4 5 6 7	Derek R. Hoffman, SBN 285784 Email: <u>Derek.Hoffman@GreshamSavage.com</u> <b>GRESHAM SAVAGE NOLAN &amp; TILDEN</b> 550 East Hospitality Lane, Suite 300 San Bernardino, CA 92408-4205 Telephone: (909) 890-4499 Facsimile: (909) 890-9877 Attorneys for SCI California Funeral Services California corporation dba Joshua Memorial I	<b>N, PC</b> 5, Inc., a Park
8		THE STATE OF CALIFORNIA
9	IN AND FOR THE CO	OUNTY OF LOS ANGELES
10		
11	Coordination ProceedingSpecial Title (Rule 1550(b))	Judicial Council Coordination Proceeding No. 4408
12 13	ANTELOPE VALLEY GROUNDWATER CASES	Santa Clara Case No. 1-05-CV-049053 Assigned to the Honorable Jack Komar
14	Including Consolidated Actions:	Department 17C
15	) Los Angeles County Waterworks District ) No. 40 v. Diamond Farming Co.	JOINT STATUS CONFERENCE STATEMENT REGARDING SCI CALIFORNIA FUNERAL SERVICES, INC.,
16		A CALIFORNIA CORPORATION DBA JOSHUA MEMORIAL PARK'S
17	Los Angeles County Waterworks District	GROUNDWATER PRODUCTION RIGHT CLAIM
18	<b>No. 40 v. Diamond Farming Co.</b> () Superior Court of California, County of () Kara Cara Na S 1500 GW 254 249	
19 20	Kern, Case No. S-1500-CV-254-348 () Wm. Bolthouse Farms, Inc. v. City of ()	Date: September 29, 2020 Time: 9:00 a.m.
20	Lancaster () Diamond Farming Co. v. City of ()	Judge: Hon. Jack Komar, Judge
22	Lancaster () Diamond Farming Co. v. Palmdale ()	[Hearing to be conducted by Courtcall]
23	Water Dist. () Superior Court of California, County of ()	
24	Riverside, consolidated actions, Case Nos. ) RIC 353 840, RIC 344 436, RIC 344 668	
25	AND RELATED ACTIONS.	
26	/	
27		
GRESHAM SAVAGE ATTORNEYS AT LAW 28 550 EAST HOSPITALITY LANE THIRD FLOOR		-1-
SAN BERNARDINO, CA 92408 (909) 890-4499		ARDING SCI CALIFORNIA FUNERAL SERVICES, INC., A RIAL PARK'S GROUNDWATER PRODUCTION RIGHT CLAIM

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## JOINT STATUS CONFERENCE STATEMENT

The undersigned parties submit the following Joint Status Conference Statement ahead of
the September 29, 2020, Status Conference Hearing, with respect to SCI California Funeral
Services, Inc., A California Corporation dba Joshua Memorial Park's ("Joshua Memorial")
Groundwater Production Right Claim.

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## I. STATEMENT OF THE CASE

On November 14, 2019, the Court heard Joshua Memorial's Motion to Intervene
("Motion") in the December 23, 2015 Judgment and Physical Solution ("Judgment") in the abovecaptioned action, the Antelope Valley Groundwater Adjudication ("Adjudication").

Joshua Memorial sought, by its Motion: (1) to intervene pursuant to Paragraph 20.9 of the
Judgment and (2) to be granted a Production Right of 122 acre-feet per year as a Non-Stipulating
Party pursuant to paragraph 5.1.10 of the Judgment.

Certain Landowner Parties filed an Amended Joint Opposition to the Motion, opposing the 13 14 granting of a Production Right. Those Landowner parties included: Tejon Ranchcorp; AVEK; 15 County Sanitation Districts 14 and 20 of Los Angeles County; State of California; Santa Monica Mountains Conservancy; 50<sup>th</sup> District Agricultural Association; Wm. Bolthouse Farms and 16 17 Bolthouse Properties, LLC; and, City of Los Angeles and Los Angeles World Airports. Palmdale Water District filed a joinder and the Antelope Valley Watermaster filed a limited joinder to the 18 19 Amended Joint Opposition. The foregoing parties are collectively referred herein to as the "Opposing Parties". 20

Following the hearing on the Motion, the Court issued its written Order which granted Joshua Memorial's request to intervene in the Judgment pursuant to Section 5.1.10 of the Judgment. The Order directs that an evidentiary hearing will be scheduled to take evidence for the Court to review and consider evidence and objections to the request for specific quantities of pumping rights for Joshua Memorial. The Order further provides that Parties may propose to engage in specified discovery, to be submitted to the Court for approval after the parties have met and conferred.

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JOINT STATUS CONFERENCE STATEMENT REGARDING SCI CALIFORNIA FUNERAL SERVICES, INC., A CALIFORNIA CORPORATION DBA JOSHUA MEMORIAL PARK'S GROUNDWATER PRODUCTION RIGHT CLAIM

## DISCOVERY II.

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2	Joshua Memorial and the Opposing Parties presented the Court with a Stipulation and		
3	Order for Discovery, which Order was entered by the Court on December 10, 2019 ("Discovery		
4	Order"). Joshua Memorial represents that it has produced all required documents and		
5	information under the Discove	information under the Discovery Order on May 14, 2020. The Opposing Parties are evaluating	
6	the discovery materials produ	the discovery materials produced by Joshua Memorial.	
7	III. SETTLEMENT		
8	The parties have recently begun conducting substantive settlement discussions.		
9	Settlement discussions are continuing at this time.		
10	IV. STATUS CO	NFERENCE CONTINUATION AND TIMELINE FOR	
11	PRESENTATION OF EVIDENCE		
12	Joshua Memorial and the Opposing Parties request that the Court schedule a further		
13	status conference hearing in approximately sixty (60) days. The purpose of the continuance is to		
14	allow time for the parties to c	allow time for the parties to continue and possibly complete settlement discussions. At the next	
15	status conference hearing, if not sooner, the parties anticipate providing to the Court a proposed		
16	process and schedule for the p	presentation of evidence in support of Joshua Memorial's Judgment	
17	Section 5.1.10 Production Right Claim.		
18			
19	September 25, 2020	GRESHAM SAVAGE NOLAN & TILDEN, PC	
20		Den 1/2 march D alloffing an	
21		By: /s/ <i>Derek R. Hoffman</i> Derek R. Hoffman,	
22		Attorneys for SCI CALIFORNIA FUNERAL SERVICES, INC., a California Corporation dba	
23		JOSHUA MEMORIAL PARK	
24	September 25, 2020	KUHS & PARKER	
25		Bu: 1/Robert G. Kubs	
26	By: <u>/s/<i>Robert G. Kuhs</i></u> Robert G. Kuhs, Attorneys for TEJON RANCHCORP		
27		Automoys for TEJON RANCICORI	
GRESHAM SAVAGE ATTORNEYS AT LAW 550 EAST HOSPITALITY LANE		-3-	
THIRD FLOOR SAN BERNARDINO, CA 92408 (909) 890-4499		E STATEMENT REGARDING SCI CALIFORNIA FUNERAL SERVICES, INC., A A JOSHUA MEMORIAL PARK'S GROUNDWATER PRODUCTION RIGHT CLAIM	
		S1461-000 3941840.1	

1	September 25, 2020	RICHARDS, WATSON & GERSON
2 3 4		By: <u>/s/James L. Markman</u> James L. Markman, Attorneys for ANTELOPE VALLEY-EAST KERN WATER AGENCY
5 6	September 25, 2020	ELLISON, SCHNEIDER, HARRIS & DONLAN
7 8 9		By: /s/Christopher Sanders Christopher Sanders, Attorneys for COUNTY SANITATION DISTRICTS 14 AND 20 OF LOS ANGELES COUNTY
10 11	September 25, 2020	STATE OF CALIFORNIA OFFICE OF ATTORNEY GENERAL
12 13 14		By: /s/Noah Golden Krasner Noah Golden-Krasner, Attorneys for STATE OF CALIFORNIA; SANTA MONICA MOUNTAINS CONSERVANCY; 50 <sup>th</sup> DISTRICT AGRICULTURAL ASSOCIATION
15 16 17	September 25, 2020	ZIMMER & MELTON
18 19		By: <u>/s/Richard G. Zimmer</u> Richard Zimmer, Attorneys for Wm. BOLTHOUSE FARMS AND BOLTHOUSE PROPERTIES, LLC
20 21	December 25, 2019	KRONICK MOSKOVITZ TIEDEMANN & GIRARD
22 23 24 25		By: /s/Stanley C. Powell Stanley C. Powell, Attorneys for CITY OF LOS ANGELES AND LOS ANGELES WORLD AIRPORTS
26 27 gresham savage 28		-4-
ATTORNEYS AT LAW 200 550 EAST HOSPITALITY LANE THIRD FLOOR SAN BERNARDINO, CA 92408 (909) 890-4499		EMENT REGARDING SCI CALIFORNIA FUNERAL SERVICES, INC., A IUA MEMORIAL PARK'S GROUNDWATER PRODUCTION RIGHT CLAIM S1461-000 – 3941840.1

1	September 25, 2020	LAGERLOF, LLP
2		
3		By: <u>/s/<i>Thomas S. Bunn</i></u> Thomas S. Bunn III, Attorneys for PALMDALE WATER DISTRICT
4		Attorneys for PALMDALE WATER DISTRICT
5	September 25, 2020	PRICE, POSTEL & PARMA LLP
6		
7		By: <u>/s/Craig A. Parton</u> Craig A. Parton,
8		Attorneys for ANTELOPE VALLEY WATERMASTER
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THIRD FLOOR San Bernardino, CA 92408 (909) 890-4499		IENT REGARDING SCI CALIFORNIA FUNERAL SERVICES, INC., A A MEMORIAL PARK'S GROUNDWATER PRODUCTION RIGHT CLAIM
		S1461-000 3941840.1

1	PROOF OF SERVICE		
2	STATE OF CALIFORNIA, COUNTY OF SAN BERNARDINO		
3			
4 5	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		
6	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.		
7 8	On September 25_, 2020, I served the foregoing document(s) described JOINT STATUS CONFERENCE STATEMENT REGARDING SCI CALIFORNIA FUNERAL SERVICES, INC., A CALIFORNIA CORPORATION DBA JOSHUA MEMORIAL		
9 10	<b>PARK'S GROUNDWATER PRODUCTION RIGHT CLAIM</b> on the interested parties in this action in the following manner:		
11	(X) <b>BY ELECTRONIC SERVICE</b> – I caused such document(s) listed above to be		
12	electronically served, via One Legal, to all parties appearing on the Santa Clara County Superior Court website, <u>http://www.scefiling.org</u> , in the action of the Antelope Valley Groundwater Cases; proof of electronic-filing through One Legal is then printed and maintained with the original documents in our office. Electronic service is complete at the time of transmission. My electronic notification email address is		
13			
14			
15	dina.snider@greshamsavage.com,		
16	I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.		
17	Executed on September 25, 2020 at San Bernardino, California.		
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19	Dim Breder		
20	DINA M. SNIDER		
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GRESHAM SAVAGE ATTORNEYS AT LAW 550 EAST HOSPITALITY LANE THIRD FLOOR	-6-		
1 HIRD FLOOR SAN BERNARDINO, CA 92408 (909) 890-4499	JOINT STATUS CONFERENCE STATEMENT REGARDING SCI CALIFORNIA FUNERAL SERVICES, INC., A CALIFORNIA CORPORATION DBA JOSHUA MEMORIAL PARK'S GROUNDWATER PRODUCTION RIGHT CLAIM		
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