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Government Code § 6103

5 Attorneys for
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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF LOS ANGELES - CENTRAL DISTRICT**

10
11 Coordination Proceeding,
Special Title (Rule 1550(b))

Judicial Council Coordination
Proceeding No. 4408

12
13 **ANTELOPE VALLEY GROUNDWATER**
14 **CASES**

LASC Case No.: BC 325201

Santa Clara Court Case No. 1-05-CV-049053
Assigned to the Hon. Jack Komar, Judge of the
Santa Clara Superior Court

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17
18 **AND ALL RELATED ACTIONS**

**JOINDER OF ANTELOPE VALLEY
WATERMASTER IN JOINT
OPPOSITION OF LANDOWNER
PARTIES TO MOTION OF SCI
CALIFORNIA FUNERAL SERVICES,
INC. TO INTERVENE IN JUDGMENT**

19 Date: November 7, 2019
20 Time: 9:00 a.m.
21 Dept: Courtcall

22 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

23 The Antelope Valley Watermaster (“Watermaster”) hereby joins in part the Joint
24 Opposition of Landowner Parties to the Motion of SCI California Funeral Services, Inc. (“SCI”)
25 to Intervene in Judgment (the “Motion”) filed by Tejon Ranchcorp, Antelope Valley-East Kern
26 Water Agency, County Sanitation Districts 14 and 20 of Los Angeles County, State of California,
27 Santa Monica Mountains Conservancy, 50th District Agricultural Association, WM. Bolthouse
28 Farms and Bolthouse Properties, LLC (the “Opposition”).

1 While the Watermaster does not oppose SCI's intervention in the Judgment as a Non-
2 Stipulating Party (and in fact has stipulated to such intervention), the Watermaster joins in the
3 Opposition to the extent SCI cannot be granted a Production Right based solely on the Motion, as
4 set forth in Sections I, II.A, II.B, III.A, and IV of the Opposition. The Opposition now raises a
5 number of presumably factually contested issues not resolvable by motion.

6 Consistent with the requirements of Paragraph 5.1.10 of the Judgment, SCI must prove-up
7 its now contested water rights claim in a separate proceeding after it has successfully intervened
8 in the Judgment as a Non-Stipulating Party. The separate proceeding must provide sufficient time
9 and adequate procedures for all Parties to present evidence and lodge objections to SCI's claimed
10 Production Right. The law and motion procedures do not provide the appropriate safeguards
11 necessary to meet the requirements of Paragraph 5.1.10.

12 Respectfully submitted,

13 Dated: October 25, 2019

PRICE, POSTEL & PARMA LLP

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15 By: C. Parton
16 CRAIG A. PARTON
17 CAMERON GOODMAN
18 Attorneys for
19 Antelope Valley Watermaster
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1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA, COUNTY OF SANTA BARBARA

3 I am employed in the County of Santa Barbara, State of California. I am over the age of
4 eighteen (18) and not a party to the within action. My business address is 200 East Carrillo Street,
Fourth Floor, Santa Barbara, California 93101.

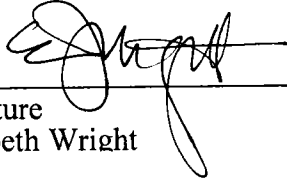
5 On October 25, 2019, I served the foregoing document described as **JOINDER OF**
6 **ANTELOPE VALLEY WATERMASTER IN JOINT OPPOSITION OF LANDOWNER**
7 **PARTIES TO MOTION OF SCI CALIFORNIA FUNERAL SERVICES, INC. TO**
INTERVENE IN JUDGMENT on all interested parties in this action by placing the original
and/or true copy.

8 **BY ELECTRONIC SERVICE:** I posted the document(s) listed above to the Santa Clara
9 County Superior Court Website @ www.scefiling.org and Glotrans website in the action of
10 the Antelope Valley Groundwater Cases.

11 (*STATE*) I declare under penalty of perjury under the laws of the State of California that
the foregoing is true and correct.

12 (*FEDERAL*) I hereby certify that I am employed in the office of a member of the Bar of
13 this Court at whose direction the service was made.

14 Executed on October 25, 2019, at Santa Barbara, California.

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17 _____
Signature
Elizabeth Wright