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7 Attorneys for Defendant and Cross-Defendant  
SPC DEL SUR RANCH LLC and its  
8 successor-in-interest, DEL SUR RANCH, LLC

10 **SUPERIOR COURT OF CALIFORNIA**

11 **COUNTY OF LOS ANGELES**

12 Coordination Proceeding  
Special Title (Rule 1550(b))

Judicial Council Coordination  
Proceeding No. 4408

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

Santa Clara Case No. 1-05-CV-049053

15 **Included Actions:**

**NOTICE OF JOINT MOTION AND  
JOINT MOTION FOR ORDER  
SUBSTITUTING SUCCESSOR-IN-  
INTEREST DEL SUR RANCH, LLC, FOR  
DEFENDANT AND CROSS-DEFENDANT  
SPC DEL SUR RANCH LLC**

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

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

DATE: November 19, 2007  
TIME: 9 a.m.  
DEPT: One  
JUDGE: Hon. Jack Komar

21 Wm. Bolthouse Farms, Inc. v. City of Lancaster  
Diamond Farming Co. v. City of Lancaster  
22 Diamond Farming Co. v. Palmdale Water Dist.  
Superior Court of California, County of Riverside,  
23 Consolidated Actions, Case Nos. RIC 353 840,  
RIC 344 436, RIC 344 668

24 **AND RELATED CROSS-ACTIONS.**  
25

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 NOTICE IS HEREBY GIVEN that on November 19, 2007, at 9:00 a.m., or as soon  
3 thereafter as the matter may be heard in Department One of this Court, located at 111 North Hill  
4 Street, Los Angeles, California, Defendant and Cross-Defendant SPC Del Sur Ranch LLC  
5 ("SPC") and its successor-in-interest, Del Sur Ranch, LLC ("Del Sur Ranch") will, and hereby do,  
6 move for an order requesting that this proceeding be continued against Del Sur Ranch in place of  
7 SPC, and allowing a supplemental answer to be filed by Del Sur Ranch showing the substitution.  
8 The motion will be made on the ground that, since the commencement of this proceeding, Del Sur  
9 Ranch has acquired all of SPC's interest in certain real property located in the City of Lancaster,  
10 California, which real property falls within the Antelope Valley Groundwater Basin boundaries  
11 adjudicated by this Court on November 3, 2006, and is therefore property that is the subject of this  
12 proceeding. A copy of the Grant Deed evidencing this transfer is attached as Exhibit "A" to the  
13 accompanying Declaration of Michael Badner. Additionally, Del Sur Ranch owns some other  
14 property in the basin to be included in this proceeding.

15 This motion will be based on this Notice of Motion and Motion, on the Declaration of  
16 Michael Badner and the Memorandum of Points and Authorities served and filed herewith, on the  
17 records and files herein, and on such evidence as may be presented at the hearing on the Motion.

18  
19 Dated: October 17, 2007

ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP

20  
21 By: Michael J. Holmes  
22 MICHAEL J. HOLMES, Attorneys for  
23 Defendant and Cross-Defendant  
24 SPC DEL SUR RANCH LLC and its  
25 successor-in-interest, DEL SUR RANCH,  
26 LLC  
27  
28

<b>SUPERIOR COURT OF CALIFORNIA COUNTY OF LOS ANGELES</b>	<b>COURT USE ONLY</b>
ATTORNEY FOR PARTY (NAME AND ADDRESS)  MARK J. HATTAM (BAR NO. 173667) MICHAEL J. HOLMES (BAR NO. 199311) ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS LLP 501 West Broadway, 15th Floor San Diego, CA 92101-3541 Telephone: (619) 233-1155 Facsimile: (619) 233-1158	
SHORT CASE TITLE  Coordination Proceeding Special Title (Rule 1550(b)) <b>ANTELOPE VALLEY GROUNDWATER CASES</b>	
Attorneys for Defendant and Cross-Defendant SPC DEL SUR RANCH LLC and its successor-in-interest, DEL SUR RANCH, LLC	JCCP No. 4408  Santa Clara Case No. 1-05-CV-049053

**PROOF OF SERVICE BY ELECTRONIC TRANSMISSION**

I am employed in the county of San Diego, state of California. I am over the age of 18 and not a party to the within action. My business address is 501 West Broadway, 15th Floor, San Diego, California 92101-3541.

On October 17, 2007, I served on the designated recipients listed in the SCEFiling system the within:

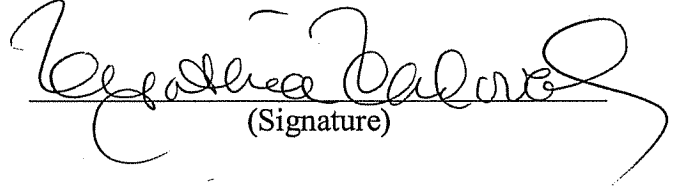
- **NOTICE OF JOINT MOTION AND JOINT MOTION FOR ORDER SUBSTITUTING SUCCESSOR-IN-INTEREST DEL SUR RANCH, LLC, FOR DEFENDANT AND CROSS-DEFENDANT SPC DEL SUR RANCH LLC**
- **MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION FOR ORDER SUBSTITUTING SUCCESSOR-IN-INTEREST DEL SUR RANCH, LLC, FOR DEFENDANT AND CROSS-DEFENDANT SPC DEL SUR RANCH LLC**
- **DECLARATION OF MICHAEL BADNER IN SUPPORT OF MOTION FOR ORDER SUBSTITUTING SUCCESSOR-IN-INTEREST DEL SUR RANCH, LLC FOR DEFENDANT AND CROSS-DEFENDANT SPC DEL SUR RANCH LLC**
- **[PROPOSED] ORDER GRANTING JOINT MOTION TO SUBSTITUTE SUCCESSOR-IN-INTEREST DEL SUR RANCH, LLC, FOR DEFENDANT AND CROSS-DEFENDANT SPC DEL SUR RANCH LLC**



(VIA ELECTRONIC MAIL) by posting the documents listed above to Santa Clara Superior Court website: [www.scefiling.org](http://www.scefiling.org) regarding the Antelope Valley Groundwater matter.

Executed on October 17, 2007, at San Diego, California. I declare under penalty of perjury under the laws of the state of California that the above is true and correct.

Cynthia Sandoval  
(Type or print name)

  
(Signature)