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Attorneys for Granite Construction Company

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**COUNTY OF LOS ANGELES - CENTRAL DISTRICT**

**ANTELOPE VALLEY GROUNDWATER  
CASES**

**Included Actions:**

Los Angeles County Waterworks District No. 40  
v. Diamond Farming Co., Superior Court of  
California, County of Los Angeles, Case No. BC  
325201;

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; and

Wm. Bolthouse Farms, Inc. v. City of Lancaster,  
Diamond Farming Co. v. Lancaster, Diamond  
Farming Co. v. Palmdale Water Dist., Superior  
Court of California, County of Riverside, Case  
No. RIC 353 840, RIC 344 436, RIC 344 668.

Judicial Council Coordination No. 4408

Santa Clara Case No. 1-05-CV-049053  
Assigned to Hon. Jack Komar

**DECLARATION OF WILLIAM  
TAYLOR IN LIEU OF TESTIMONY  
AT PHASE 4 TRIAL**

**DECLARATION**

I, William Taylor, declare:

1. I am employed by Granite Construction Company (Granite) as the Resource  
Development Project Manager for the Central California Region. I have been employed by

1 Granite since 2008. I am over the age of eighteen and if I were called as a witness, I would and  
2 could testify to the facts set forth herein.

3 2. I am one of the managers in charge of managing Granite's facilities, operations,  
4 and related permits for the Central California Region. If called upon to testify as to the facts set  
5 forth herein, I could and would competently testify to them, because they are personally known  
6 to me to be true or I have ascertained them from business records maintained by Granite's  
7 employees in the performance of their responsibilities in the ordinary course of Granite's  
8 business.  
9

10 3. I am familiar with the real property owned and leased by Granite that is located  
11 within the Antelope Valley Area of Adjudication (AVAA). I am also familiar with the lease  
12 dated April 8, 1987 as amended April 1, 2010 by and between Granite and Little Rock Sand and  
13 Gravel, Inc. (Lease).  
14

15 4. During the course of my employment with Granite, I have become familiar with  
16 the methods and procedures of compiling and maintaining data and documents concerning  
17 Granite's leases, land ownership, and permits. I am one of the custodians of the records and files  
18 of Granite as those records and files pertain to land that is leased or owned by Granite.  
19

20 5. The records and files of Granite as they pertain to Granite's real property leases  
21 and land ownership are kept in the ordinary course of Granite's business. From my personal  
22 experience and knowledge, I believe the records attached to this declaration to be accurate and  
23 trustworthy.

24 **Property Ownership, Lease, and Parcel Size**

25 6. Granite owns certain real property within the AVAA identified in **Exhibit A**  
26 attached hereto as Parcels 6, 7, 8, 9, 10, 11, 12, and 13. The approximate size of each parcel is  
27 listed on Exhibit A under the column "Acreage."  
28

