1 2 3 4 5 6 7 8	SMILAND CHESTER LLP Theodore A. Chester, Jr. (SBN 105405) 601 West Fifth Street, Suite 1100 Los Angeles, California 90071 Telephone: (213) 891-1010 Facsimile: (213) 891-1414 Attorneys for Cross-Defendants Landiny, Inc.; Bruce Burrows; 300 A 40 H, LLC; Little Rock Sand and Gravel, Inc.; The George and Charlene Lane Family Trust; The Frank and Yvonne Lane 1993 Family Trust; Monte Vista Building Sites, Inc., and A.V. Materials, Inc. SUPERIOR COURT OF THE STATE OF CALIFORNIA			
	COUNTY OF LOS ANGELES			
10	Coordination Proceeding Special Title (Rule 1550 (b))		ouncil Coordination No. 4408 to Hon. Jack Komar; Dept 17]	
12 13	ANTELOPE VALLEY GROUNDWATER CASES	Santa Clar	a Case No.: 1-05-CV-049053	
14 15	Included CONSOLIDATED Actions:	JOINDER IN JOINT CASE MANAGEMENT CONFERENCE STATEMENT AND SUPPLEMENTAL CASE MANAGEMENT STATEMENT OF THE LANE FAMILY Date: January 7, 2015 Time: 10:00 a.m.		
16 17	Los Angeles County Waterworks District No. 340 vs. Diamond Farming Company 1 Los Angeles Superior Court Case No. 1 BC325201			
18 19 20	Los Angeles County Waterworks District No. 40 vs. Diamond Farming Company Kern County Superior Court Case No. S-1500-) CV-254348 NFT	Dept.:	Court-Call Only	
21222324	Diamond Farming Company vs. City of Lancaster Riverside County Superior Court Lead Case No. RIC 344436 [Consolidated w/ Case Nos. 344668 & 353840]			
25 26	Willis v. Los Angeles County Waterworks District No. 40; Los Angeles Superior Court Case No. BC 364553			
27 28	Wood v. Los Angeles County Waterworks District No. 40; Los Angeles Superior Court Case No. BC 391869			

Joinder

Landinv, Inc., Bruce Burrows, 300 A 40 H, LLC, Little Rock Sand and Gravel, Inc., the George and Charlene Lane Family Trust, the Frank and Yvonne Lane 1993 Family Trust, Monte Vista Building Sites, Inc., and A.V. Materials, Inc. hereby join in the Joint Case Management Conference Statement filed December 31, 2014 by the Stipulating Parties.

Supplemental Statement by the Lane Family

The Frank and Yvonne Lane 1993 Family Trust, Little Rock Sand and Gravel, Inc., and Monte Vista Building Sites, Inc. (the "Lane Family") and Granite Construction Company ("Granite") are parties to this lawsuit. The Lane Family and Granite have participated in the settlement discussions referred to in the Stipulating Parties' Joint Case Management Statement.

The Lane Family owns about 240 acres within the Antelope Valley Area of Adjudication, and since 1987 has leased that property to Granite, where Granite has conducted quarrying operations. The current term of the lease expires in April 2021. The lease provides that during its term Granite has the right as tenant to use "such water rights as [the Lane Family] has to . . . underground water located . . . under the leased premises." Since about 1987, Granite has produced groundwater from wells located on the leased property and used that water on the leased property in connection with Granite's quarrying operations on the leased property. Granite purchased other property adjacent to the leased property in 2008. However, the Lane Family understands that to date Granite has not conducted quarrying operations on such other property.

There exists a dispute between the Lane Family and Granite, and no other parties, with respect to title to water rights associated with the leased property that would be adjudicated in this case. The Lane Family would seek title to the adjudicated rights as land owner (the water rights would remain subject to Granite's use for the term of the lease). The Lane Family understands that Granite seeks separate conflicting title in its own name. The Lane Family has made a number of attempts to resolve this two-party dispute with Granite, but, to date, those attempts have failed.

The Lane Family is prepared to stipulate to entry of the proposed judgment that has been negotiated by and among the settling parties. By doing so the Lane Family would be settling with all other Stipulating Parties, provided, however, that the issue of title to water rights allocated under the proposed judgment as between the Lane Family and Granite would remain undecided. The Lane Family would seek to have this remaining two-party dispute decided by the Court or by an alternate approach, including mediation.

The Court's November 4, 2014 Case Management Order sets forth a schedule for determining disputed matters, and the Lane Family would ask that its two-party dispute with Granite be included therein.

The principals of Granite and the Lane Family met during the week of December 15th in an attempt to settle this matter. They are scheduled to meet again in advance of the January 7, 2015 case management conference. The Lane Family's counsel will report to the Court after such meeting.

Dated: December 31, 2014 Respectfully submitted

SMILAND CHESTER LLP

By /s/ Theodore A. Chester, Jr.
Theodore A. Chester, Jr.

PROOF OF SERVICE			
STATE OF CALIFORNIA)			
COUNTY OF LOS ANGELES)			
I, Felicia Herbstreith am employed in the County of Los Angeles, State of California.	I		
am over the age of 18 and not a party to the within action; my business address is: 140 South			
Lake Avenue, Suite 274, Pasadena, California 91101.			
On December 31, 2014, I served the foregoing document described as: CASE			
MANAGEMENT STATEMENT OF LITTLE ROCK SAND AND GRAVEL, INC.; TH	E		
FRANK AND YVONNE LANE 1993 FAMILY TRUST; AND MONTE VISTA			
BUILDING SITES, INC. on the interested parties in this action by posting the document liste	ed		
above to the Santa Clara County Superior website in regard to the Antelope Valley Groundwa	ter		
Adjudication matter, pursuant to the Electronic Filing and Service Standing Order of Judge			
Komar.			
I declare under penalty of perjury under the laws of the State of California that the abo	ve		
s true and correct.			
Executed on December 31, 2014 , at Los Angeles, California.			
/s/ Felicia Herbstreith Felicia Herbstreith			
Teneta Herostrettii			