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Attorneys for 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

Coordination Proceeding Special Title
(Rule 1550 (b))

Judicial Council Coordination No. 4408
[Assigned to Hon. Jack Komar; Dept 17]

**ANTELOPE VALLEY GROUNDWATER
CASES**

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

Included **CONSOLIDATED** Actions:

**DECLARATION OF THEODORE A.
CHESTER, JR. IN SUPPORT OF THE
LANE FAMILY'S NOTICE OF MOTION
AND MOTION FOR POST-JUDGMENT
SUPPLEMENTAL ORDER; AND
EXHIBITS THERETO**

Los Angeles County Waterworks District No.
40 vs. Diamond Farming Company
Los Angeles Superior Court Case No.
BC325201

[Filed Concurrently with Motion for Post-
Judgment Supplemental Order]

Los Angeles County Waterworks District No.
40 vs. Diamond Farming Company
Kern County Superior Court Case No. S-1500-
CV-254348 NFT

Date: March 21, 2016
Time: 1:30 p.m.
Dept.: TBA
Court: San Jose Superior Court
191 N. First Street
San Jose, CA 95113

Diamond Farming Company vs. City of
Lancaster Riverside County Superior Court
Lead Case No. RIC 344436 [Consolidated w/
Case Nos. 344668 & 353840]

Willis v. Los Angeles County Waterworks
District No. 40; Los Angeles Superior Court
Case No. BC 364553

Wood v. Los Angeles County Waterworks
District No. 40; Los Angeles Superior Court
Case No. BC 391869

1 **DECLARATION OF THEODORE A. CHESTER**

2 Theodore A. Chester, Jr. declares as follows:

3 1. I am the attorney of record for cross-defendants Little Rock Sand and Gravel,
4 Inc.; The George and Charlene Lane Family Trust; The Frank and Yvonne Lane 1993 Family
5 Trust; Monte Vista Building Sites, Inc., and A.V. Materials, Inc. in this matter and a member in
6 good standing with the California State Bar, and am admitted to practice before this Court. I
7 have personal knowledge of the matters stated in this declaration and, if called upon to do so, I
8 would and could competently testify thereto.

9 2. Attached as "Exhibit 1" is a true and correct copy of the relevant pages of the
10 Lane Family's Phase 4 trial exhibit 4 LANE 2 pp. 36-74, 84-159. (Notice of Errata; Declaration
11 of George M. Lane; Granite Construction Lease Documents) (Doc. No. 5997).

12 3. Attached as "Exhibit 2" is a true and correct copy of the Notice of Errata Re:
13 Granite Construction Company's Response to Discovery Order for Phase 4 Trial, dated January
14 11, 2013. (Doc. No. 5772).

15 4. Attached as "Exhibit 3" is a true and correct copy of the relevant pages of the
16 transcript of the May 9, 2013 Deposition of William Taylor.

17 5. Attached as "Exhibit 4" is a true and correct copy of the Declaration of William
18 Taylor, dated January 31, 2013 (Phase 4 Trial Exhibit "Granite-1"). (Doc. No. 5962).

19 6. Attached as "Exhibit 5" is a true and correct copy of the Declaration of Steven
20 McCracken, dated September 28, 2015. (Doc. No. 10698).

21 7. Attached as "Exhibit 6" is a true and correct copy of the Declaration of Steven
22 McCracken, dated May 29, 2013. (Phase 4 Trial Exhibit "Granite-2") (Doc. No. 6849).

23 8. Attached as "Exhibit 7" is a true and correct copy of the Court's Amended
24 Statement of Partial Decision for Phase IV Trial with Party Name Corrections, dated June 29,
25 2013. (Doc. No. 6973).

26 9. Attached as "Exhibit 8" is a true and correct copy of the relevant pages of the
27 transcript of the Phase 4 Trial proceedings held on May 30, 2013.
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1 10. Attached as "Exhibit 9" is a true and correct copy of the relevant pages of the
2 Proposed Judgment and Physical Solution, attached as Exhibit A to the Court's December 23,
3 2015 Judgment. (Doc. No. 11020).

4 11. Attached as "Exhibit 10" is a true and correct copy of the relevant pages of the
5 Notice of Filing of Stipulation for Entry of Judgment filed March 4, 2015. (Doc. No. 9624).

6 12. Attached as "Exhibit 11" is a true and correct copy of the Joinder in Joint Case
7 Management Conference Statement and Supplemental Case Management Statement of the Lane
8 Family, dated December 31, 2014. (Doc. No. 9540).

9 13. Attached as "Exhibit 12" is a true and correct copy of the Court's January 7, 2015
10 Minute Order. (Doc. No. 9564).

11 14. Attached as "Exhibit 13" is a true and correct copy of the Court's August 3, 2015
12 Minute Order. (Doc. No. 10307).

13 15. Attached as "Exhibit 14" is a true and correct copy of the Supplemental Case
14 Management Conference Statement of the Lane Family, dated October 6, 2015. (Doc. No.
15 10779).

16 I declare under penalty of perjury of the laws of the State of California that the foregoing
17 is true and correct.

18 Executed on January 31, 2016, at Pasadena, California.

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21 Theodore A. Chester, Jr.
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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 **January 31, 2016**, I served the foregoing document described as: **DECLARATION OF THEODORE A. CHESTER IN SUPPORT OF THE LANE FAMILY'S MOTION FOR POST-JUDGMENT SUPPLEMENTAL ORDER; AND EXHIBITS THERETO [Filed Concurrently with Lane Family's Notice of Motion and Motion for Post-Judgment Supplemental Order]** on the interested parties in this action by posting the document listed above to the Santa Clara County Superior website in regard to the Antelope Valley Groundwater 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 above is true and correct.

Executed on **January 31, 2016**, at Pasadena, California.


Felicia Herbstreith