

EXHIBIT 11

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Attorneys for Cross-Defendants
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.

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:

**JOINDER IN JOINT CASE
MANAGEMENT CONFERENCE
STATEMENT AND SUPPLEMENTAL
CASE MANAGEMENT STATEMENT OF
THE LANE FAMILY**

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

Date: January 7, 2015
Time: 10:00 a.m.
Dept.: Court-Call Only

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

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 Joinder

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

6 Supplemental Statement by the Lane Family

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

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

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

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

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

10 The principals of Granite and the Lane Family met during the week of December 15th in
11 an attempt to settle this matter. They are scheduled to meet again in advance of the January 7,
12 2015 case management conference. The Lane Family's counsel will report to the Court after
13 such meeting.

14
15 Dated: December 31, 2014

Respectfully submitted

SMILAND CHESTER LLP

17
18 By /s/ Theodore A. Chester, Jr.
Theodore A. Chester, Jr.

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA }
3 COUNTY OF LOS ANGELES }

4 I, Felicia Herbstreith am employed in the County of Los Angeles, State of California. I
5 am over the age of 18 and not a party to the within action; my business address is: 140 South
6 Lake Avenue, Suite 274, Pasadena, California 91101.

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8 On December 31, 2014, I served the foregoing document described as: **CASE**
9 **MANAGEMENT STATEMENT OF LITTLE ROCK SAND AND GRAVEL, INC.; THE**
10 **FRANK AND YVONNE LANE 1993 FAMILY TRUST; AND MONTE VISTA**
11 **BUILDING SITES, INC.** on the interested parties in this action by posting the document listed
12 above to the Santa Clara County Superior website in regard to the Antelope Valley Groundwater
13 Adjudication matter, pursuant to the Electronic Filing and Service Standing Order of Judge
14 Komar.

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

17 Executed on **December 31, 2014**, at Los Angeles, California.

18
19 /s/ Felicia Herbstreith
20 Felicia Herbstreith
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