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*State Lands Commission*

**FILED**  
 SUPERIOR COURT of CALIFORNIA  
 COUNTY of SANTA BARBARA  
**03/15/2024**  
 Darrel E. Parker, Executive Officer  
 BY Baksh, Narzalli  
 Deputy Clerk

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
 9 COUNTY OF SANTA BARBARA  
 10 CIVIL DIVISION

13 **CALIFORNIA STATE LANDS**  
**COMMISSION,**  
 14  
 Plaintiff,  
 15  
 16 v.  
 17 **SIGNAL HILL SERVICE, INC.; PACIFIC**  
**OPERATORS, INC., DBA PACIFIC**  
 18 **OPERATORS OFFSHORE, INC.; DOES 1-**  
**100, INCLUSIVE,**  
 19  
 Defendant.

Case No. 19CV04295

~~PROPOSED~~ JUDGMENT PURSUANT TO STIPULATION

[Assigned to Hon. Donna D. Geck, Dept. 4]

21 **SIGNAL HILL SERVICE, INC., and**  
**CARONE PETROLEUM**  
 22 **CORPORATION,**  
 23  
 Cross-Complainants,  
 24 v.  
 25 **CALIFORNIA STATE LANDS**  
 26 **COMMISSION**  
 27  
 Cross-Defendants.

1           On August 13, 2019, plaintiff and cross-defendant California State Lands Commission  
2 (“Commission”) filed this action against defendant and cross-complainant, Signal Hill Service  
3 Inc. (“Signal Hill”), and defendant Pacific Operators, Inc. d/b/a Pacific Operators Offshore, Inc.  
4 (“Pacific Operators”) for breach of contract, trespass, and declaratory relief based on damages  
5 following the Commission’s termination of a pipeline lease operated by Signal Hill and Pacific  
6 Operators. On April 30, 2021, Signal Hill and cross-complainant, Carone Petroleum Corporation  
7 (“Carone”) filed a fourth amended cross-complaint alleging two causes of action for breach of  
8 contract based on the lease termination, and on June 21, 2021, the Commission filed a cross-  
9 complaint for indemnity and declaratory relief.

10           Pursuant to stipulation of the parties, entered for purposes of fully resolving all claims and  
11 issues in this litigation,

12           IT IS THEREFORE ORDERED AND ADJUDGED as follows:

13           1.     As to the California State Lands Commission’s First Amended Complaint, judgment  
14 is hereby entered on the Commission’s First Cause of Action for Breach of Contract in favor of  
15 plaintiff California State Lands Commission and against defendant Signal Hill Services, Inc. in  
16 the amount of \$282,094.34.

17           2.     As to the Commission’s Second Cause of Action for Trespass, judgment is entered in  
18 favor of plaintiff California State Lands Commission and against defendants Signal Hill Service,  
19 Inc. in the amount of \$17,351.40.

20           3.     As to the claims in Signal Hill’s Services, Inc. and Carone Petroleum Corporation’s  
21 Fourth Amended Cross-Complaint, judgment is hereby entered in favor of cross-defendant  
22 California State Lands Commission and against cross-complainants Signal Hill Services, Inc. and  
23 Carone Petroleum Corporation on all causes of action.

24           4.     As to the third cause of action for declaratory relief in the Commission’s First  
25 Amended Complaint, the claim is dismissed.

26           5.     As to the California State Lands Commission’s cross-complaint for indemnity and  
27 declaratory relief against Signal Hill Services, Inc., the cross-complaint is dismissed.

28           6.     This Judgment shall be binding on all parties.

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7. This Judgment shall become effective upon the date the Clerk enters it.

8. The Commission is entitled to recover its costs in the amount of \$\_\_\_\_\_.

IT IS SO ORDERED, ADJUGED, and DECREED.

Dated: 03/15/2024



THE HONORABLE DONNA D. GECK  
Judge of the Santa Barbara Superior Court

APPROVED AS TO FORM:

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Dated: March 13, 2024

Respectfully submitted,

ROB BONTA  
Attorney General of California  
CHRISTINA BULL ARNDT  
Supervising Deputy Attorney General



LEENA M. SHEET  
Deputy Attorney General  
*Attorneys for Plaintiff and Cross-Defendant  
State Lands Commission*

Dated: March 13, 2024

Hill, Farrer & Burrill LLP  
Kevin H. Brogan



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Kevin H. Brogan  
Attorneys for Defendants and Cross-  
complainants Signal Hill Service, Inc.;  
Pacific Operators, Inc., dba Pacific  
Operators Offshore, Inc. and Carone  
Petroleum Corporation

**DECLARATION OF SERVICE BY E-MAIL & U.S. MAIL**

Case Name: ***California State Lands Commission v. Signal Hill Service, Inc.; Pacific Operators, Inc., DBA Pacific Operators Offshore, Inc.; Does 1 - 100, Inclusive,***  
No.: **19CV04295**

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar, at which member's direction this service is made. I am 18 years of age or older and not a party to this matter.

On March 13, 2024, I served the attached

- **STIPULATION FOR ENTRY OF JUDGMENT**
  
- **[PROPOSED] JUDGMENT PURSUANT TO STIPULATION**

by transmitting a true copy via electronic mail. In addition, I placed a true copy thereof enclosed in a sealed envelope, in the internal mail system of the Office of the Attorney General, addressed as follows:

Kevin H. Brogan  
Hill, Farrer & Burrill, LLP  
One California Plaza, 37th Floor  
300 South Grand Avenue  
Los Angeles, CA 90071-3147  
**E-mail Address:** kbrogan@hfbllp.com

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on March 13, 2024, at San Francisco, California.

G. Guardado  
\_\_\_\_\_  
Declarant

  
\_\_\_\_\_  
Signature