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6 Attorneys for SCI California Funeral Services, Inc., a
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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **IN AND FOR THE COUNTY OF LOS ANGELES**
11

12 Coordination Proceeding
Special Title (Rule 1550(b))

) Judicial Council Coordination
) Proceeding No. 4408

13 **ANTELOPE VALLEY**
14 **GROUNDWATER CASES**

) Santa Clara Case No. 1-05-CV-049053
) Assigned to the Honorable Jack Komar
) Department 17C

15 Including Consolidated Actions:

16 **Los Angeles County Waterworks District**
No. 40 v. Diamond Farming Co.
17 Superior Court of California, County of Los
Angeles, Case No. BC 325 201

) **STIPULATION AND ORDER FOR**
) **DISCOVERY REGARDING SCI**
) **CALIFORNIA FUNERAL SERVICES, INC.,**
) **A CALIFORNIA CORPORATION DBA**
) **JOSHUA MEMORIAL PARK'S**
) **GROUNDWATER PRODUCTION RIGHT**
) **CLAIM**

18 **Los Angeles County Waterworks District**
19 **No. 40 v. Diamond Farming Co.**
Superior Court of California, County of
20 Kern, Case No. S-1500-CV-254-348

) Date: December 12, 2019
) Time: 1:30 p.m.
) Judge: Hon. Jack Komar, Judge

21 **Wm. Bolthouse Farms, Inc. v. City of**
Lancaster
22 **Diamond Farming Co. v. City of**
Lancaster
23 **Diamond Farming Co. v. Palmdale**
Water Dist.

) **[Hearing to be conducted by Courtcall]**

24 Superior Court of California, County of
Riverside, consolidated actions, Case Nos.
25 RIC 353 840, RIC 344 436, RIC 344 668

26 AND RELATED ACTIONS.
27

1 This *Stipulation and Order for Discovery Regarding SCI California Funeral Services,*
2 *Inc., A California Corporation dba Joshua Memorial Park's Groundwater Production Right*
3 *Claim*, is submitted pursuant to the Court's Order After Hearing on November 14, 2019
4 ("Order") in the above captioned matter.

5 I. RECITALS

6 1. On November 14, 2019, the Court heard SCI CALIFORNIA FUNERAL
7 SERVICES, INC., a California Corporation dba JOSHUA MEMORIAL PARK's ("Joshua
8 Memorial"), Motion to Intervene ("Motion") in the December 23, 2015 Judgment and Physical
9 Solution ("Judgment") in the above-captioned action, the Antelope Valley Groundwater
10 Adjudication ("Adjudication").

11 2. Joshua Memorial sought, by its motion: (1) to intervene pursuant to Paragraph 20.9
12 of the Judgment and (2) to be granted a Production Right of 122 acre-feet per year as a Non-
13 Stipulating Party pursuant to paragraph 5.1.10 of the Judgment.

14 3. Certain Landowner Parties filed an Amended Joint Opposition to the Motion,
15 opposing only the granting of a production right. Those Landowner parties included: Tejon
16 Ranchcorp; AVEK; County Sanitation Districts 14 and 20 of Los Angeles County; State of
17 California; Santa Monica Mountains Conservancy; 50th District Agricultural Association; Wm.
18 Bolthouse Farms and Bolthouse Properties, LLC; and, City of Los Angeles and Los Angeles
19 World Airports. Palmdale Water District filed a joinder and the Antelope Valley Watermaster
20 filed a limited joinder to the Amended Joint Opposition. The foregoing parties are collectively
21 referred herein to as the "Opposing Parties".

22 4. Following the hearing on the Motion, the Court issued the written Order. The Order
23 granted Joshua Memorial's request to intervene in the Judgment pursuant to Section 5.1.10 of the
24 Judgment. The Order directs that an evidentiary hearing will be scheduled to take evidence for the
25 Court to review and consider evidence and objections to the request for specific quantities of
26 pumping rights for Joshua Memorial. The Order further provides that Parties may propose to

engage in specified discovery which may be submitted to the Court for approval only after the parties have met and conferred regarding specific proposals, and that if the parties stipulate, any such stipulation shall be submitted to the Court for approval along with any objections thereto.

II. STIPULATION

In accordance with the Order at page 2, lines 12-23, counsel for Joshua Memorial and the undersigned Opposing Parties hereby stipulate as follows:

1. To the extent the information and documents are available to Joshua Memorial, Joshua Memorial will produce to the Opposing Parties in a verified response:
 - a. Groundwater extraction and diversion reports filed pursuant to Water Code section 5001 et seq. for the years 2000 through 2014, or a statement under oath that no such reports have been filed.
 - b. All electrical records relating to Joshua Memorial's groundwater production well for years 2000 through 2014.
 - c. The acreage under irrigation with well water at Joshua Memorial's property for each year from 2000 through 2014.
 - d. The name, last known address and telephone number of each onsite manager and any other Joshua Memorial employees with personal knowledge regarding irrigation practices and water use for each year from 2000 through current.
 - e. The periods, if any, between 2000 and 2015 that the mobile home on the Joshua Memorial property was connected to the electrical meter serving the groundwater well and, if connected, the periods during which the mobile home was occupied.
2. Joshua Memorial will provide an updated LSCE Report for the timeframe 2000 through current.
3. Once the items set forth in paragraphs 1 and 2 of this stipulation are produced, Joshua Memorial and the Opposing Parties shall meet and confer regarding whether further discovery is necessary. No additional discovery beyond the items set forth in paragraphs 1

1 and 2 of this stipulation shall be required unless ordered by the Court or stipulated to by the
2 parties.

- 3 4. Joshua Memorial and the undersigned Opposing Parties request the Court set a further
4 status hearing in approximately ninety (90) days.

5
6 December 9, 2019

GRESHAM SAVAGE NOLAN & TILDEN, PC

7
8 By: 

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Derek R. Hoffman,
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SERVICES, INC., a California Corporation dba
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Christopher Sanders,
Attorneys for COUNTY SANITATION DISTRICTS 14
AND 20 OF LOS ANGELES COUNTY

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December 10, 2019

STATE OF CALIFORNIA OFFICE OF
ATTORNEY GENERAL

By: /s/
Noah Golden-Krasner,
Attorneys for STATE OF CALIFORNIA; SANTA
MONICA MOUNTAINS CONSERVANCY; 50th
DISTRICT AGRICULTURAL ASSOCIATION

December 7, 2019

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By: [Signature]
Richard Zimmer,
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7 December __, 2019

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22 Craig A. Parton,
23 Attorneys for ANTELOPE VALLEY WATERMASTER

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III. ORDER

GOOD CAUSE APPEARING THEREFORE, it is so Ordered.

Date: December __, 2019

Hon. Jack Komar (Ret.)
Judge of the Superior Court

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PROOF OF SERVICE
STATE OF CALIFORNIA, COUNTY OF SAN BERNARDINO

Re: *ANTELOPE VALLEY GROUNDWATER CASES*
Los Angeles County Superior Court Judicial Council Coordinated
Proceedings No. 4408; Santa Clara County Superior Court Case No. 1-05-CV-049053


I am employed in the County of San Bernardino, State of California. I am over the age of 18 years and not a party to the within action; my business address is: 550 East Hospitality Lane, Suite 300, San Bernardino, CA 92408-4205.

On December 10, 2019, I served the foregoing document(s) described **STIPULATION AND ORDER FOR DISCOVERY REGARDING SCI CALIFORNIA FUNERAL SERVICES, INC., A CALIFORNIA CORPORATION DBA JOSHUA MEMORIAL PARK'S GROUNDWATER PRODUCTION RIGHT CLAIM** on the interested parties in this action in the following manner:

(X) **BY ELECTRONIC SERVICE** – I caused such document(s) listed above to be electronically served, via One Legal, to all parties appearing on the Santa Clara County Superior Court website, <http://www.scefiling.org>, in the action of the Antelope Valley Groundwater Cases; proof of electronic-filing through One Legal is then printed and maintained with the original documents in our office. Electronic service is complete at the time of transmission. My electronic notification email address is dina.snider@greshamsavage.com,

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

Executed on December 10, 2019 at San Bernardino, California.


DINA M. SNIDER