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 11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
 12 **COUNTY OF LOS ANGELES**

13 Coordination Proceeding
 14 Special Title (Rule 1550(b))

15 **ANTELOPE VALLEY**
 16 **GROUNDWATER CASES**

17 Included Actions:

18 Los Angeles County Waterworks District
 19 No. 40 v. Diamond Farming Co.
 20 Superior Court of California
 21 County of Los Angeles, Case No. BC
 22 325201

23 Los Angeles County Waterworks District
 24 No. 40 v. Diamond Farming Co.
 25 Superior Court of California, County of
 26 Kern, Case No. S-1500-CV 254348

27 Wm. Bolthouse Farms, Inc. v. City of
 28 Lancaster Diamond Farming Co. v. City of
 Lancaster Diamond Farming Co. v. Palmdale
 Water Dist. Superior Court of California,
 County of Riverside, consolidated actions,
 Case Nos. RIC 353840, RIC 344436, RIC
 344668

Judicial Council Coordination Proceeding
 No. 4408

SC Case No. 105CV 049053
 Assigned to Hon. Jack Komar

**CASE MANAGEMENT STATEMENT OF
 WDS CALIFORNIA II, LLC, GERTRUDE
 J. VAN DAM, DELMAR D. VAN DAM,
 CRAIG VAN DAM AND GARY VAN
 DAM**

DATE: October 12, 2012
TIME: 9:00 a.m.
DEPT: 1

1 TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

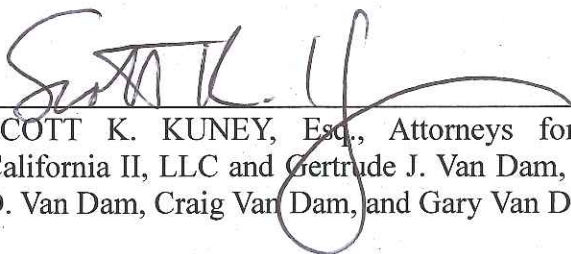
2 WDS CALIFORNIA II, LLC (“WDS”), GERTRUDE J. VAN DAM, DELMAR D.
3 VAN DAM, CRAIG VAN DAM and GARY VAN DAM (collectively “VAN DAMS”),
4 provide the following Case Management Statement.

5 Our offices participated in the October 3-4 mediation session in Sacramento with Justice
6 Robie and join in Federal Defendants Case Management Conference Statement as well as the
7 Case Management Statement filed on behalf of Bolthouse Properties, LLC and Wm. Bolthouse
8 Farms, Inc. Specifically, we concur with the assessment that significant progress has been
9 made in the negotiations among the parties and that further progress will be inhibited if parties
10 are engaged in pre-trial preparation and burdensome discovery efforts. Instead the parties
11 resources are best spent in a concentrated effort to resolve this case through the several October
12 and November negotiation/drafting sessions and the November 29-30, 2012 mediation session
13 schedule agreed to with Justice Robie. In light of these current circumstances, we respectfully
14 request and recommend the court order the following:

- 15 1. That all pre-trial procedures, including all pending discovery be stayed for a period
16 of 60 days.

17
18 Dated: October 8, 2012

THE LAW OFFICES OF YOUNG WOOLDRIDGE, LLP

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20 By: 
21 SCOTT K. KUNEY, Esq., Attorneys for WDS
22 California II, LLC and Gertrude J. Van Dam, Delmar
23 D. Van Dam, Craig Van Dam, and Gary Van Dam
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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF KERN

I, ERIN L. LINDSEY, declare: I am and was at the times of the service hereunder mentioned, over the age of eighteen (18) years, and not a party to the within cause. My business address is The Law Offices of Young Wooldridge LLP, 1800 30th Street, Fourth Floor, Bakersfield, CA 93301.

On October 8, 2012, I caused the foregoing document(s) entitled as: **CASE MANAGEMENT STATEMENT OF WDS CALIFORNIA II, LLC, GERTRUDE J. VAN DAM, DELMAR D. VAN DAM, CRAIG VAN DAM, and GARY VAN DAM** to be served on the parties via the following service:

X (BY POSTING) I posted the document listed above to the Santa Clara Superior Court website regarding the Antelope Valley Groundwater matter pursuant to the Court's Clarification Order. Electronic service posting completed through www.scefiling.org.

X (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on October 8, 2012, at Bakersfield, California.



ERIN L. LINDSEY