

1 ERIC N. ROBINSON, State Bar No. 191781
erobinson@kmtg.com

2 STANLEY C. POWELL, State Bar No. 254057
spowell@kmtg.com

3 JENIFER N. RYAN, State Bar No. 311492
jryan@kmtg.com

4 KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD
A Professional Corporation
5 1331 Garden Highway, 2nd Floor
Sacramento, California 95833
6 Telephone: (916) 321-4500
Facsimile: (916) 321-4555

7 MICHAEL N. FEUER, State Bar No. 111529
8 Los Angeles City Attorney

JULIE CONBOY RILEY, General Counsel, Water and Power
9 BRIAN C. OSTLER, General Counsel, Los Angeles World Airports
NARGIS CHOUDHRY, Deputy City Attorney, Los Angeles World Airports
10 Attorneys for Defendant CITY OF LOS ANGELES and
LOS ANGELES WORLD AIRPORTS

11 Attorneys for City of Los Angeles and Los
12 Angeles World Airports

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
14 **COUNTY OF LOS ANGELES**

16 Coordination Proceeding

Judicial Council Coordination
Proceeding No. 4408

17 ANTELOPE VALLEY GROUNDWATER
18 CASES,

**STIPULATION REGARDING
ZAMRZLAS' HEARING, DISCOVERY
AND BRIEFING SCHEDULE;
[PROPOSED] ORDER**

19 Los Angeles County Waterworks District No.
40 v. Diamond Farming Co.

The Hon. Jack Komar, Dept. 17
Santa Clara Case No. 105 CV 049053

20 Los Angeles County Waterworks District No.
21 40 v. Diamond Farming Co.

22 Wm Bolthouse Farms, Inc. v. City of
Lancaster

Riverside County Superior Court
Lead Case No. RIC 344436
Case No. RIC 344668
Case No. RIC 353840

23 Diamond Farming Co. v. City of Lancaster

Los Angeles Superior Court Case
No. BC 325201

24 Diamond Farming Co. v. Palmdale Water
25 District,

Kern County Superior Court Case
No. S-1500-CV-254348

26 AND RELATED ACTIONS
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STIPULATION

The City of Los Angeles (Los Angeles World Airports), Grimmway Enterprises, Palmdale Water District, County Sanitation Districts of Los Angeles County Nos. 14 and 20 (collectively, “Settling Parties”), Antelope Valley Watermaster, and Johnny Zamrzla, Pamella Zamrzla, Johnny Lee Zamrzla and Jeanette Zamrzla (“Zamrzlas”), by and through their respective attorneys of record (individually, “Party” and collectively, “Parties”), stipulate and agree as follows:

RECITALS

A. The Court granted the Settling Parties’ ex parte application to continue the May 3, 2022, hearing on the Zamrzlas’ Motions to Set Aside or Modify the Judgment (“Motions”) to 9 a.m. on August 9, 2022.

B. The Court directed the Parties to meet and confer and to inform the Court of the outcome of their meet-and-confer efforts on the following: (1) hearing date and length; (2) venue; (3) discovery and briefing deadlines; and (4) court reporter.

C. The Parties on April 22, 2022, met and conferred on the issues designated by the Court and reached agreement as set forth as set forth in the May 14, 2022, Order regarding the Zamrzlas’ Hearing, Discovery and Briefing Schedule.

D. On June 20, 2022, the Parties agreed to continue the dates for discovery, briefing and the hearing as set forth in the June 22, 2022, Order regarding the Zamrzlas’ Hearing, Discovery and Briefing Schedule.

E. On October 7, 2022, the Parties agreed to continue the dates for briefing and the hearing as set forth below.

IT IS HEREBY STIPULATED AND AGREED THAT:

1. **Hearing date and venue.** The October 25, 2022, hearing date on the Motions is vacated and rescheduled to start at 9 a.m. on Tuesday, December 13, 2022. The hearing is estimated to last two days and will take place in Department 17 of the Santa Clara County Superior Court located at 161 North First Street, San Jose, California 95113.

2. **Scope.** The scope of issues for discovery and to be tried at the hearing will be limited to whether the Zamrzlas are bound by the Judgement and Physical Solution entered on December 28,

1 2015. Specifically, the issues are limited to the issues raised by the Zamrzlas’ motions – whether the
2 Zamrzlas were properly given notice of the litigation, and whether they are properly classified as
3 members of the Small Pumpers Class. All issues relating to the quantity of water the Zamrzlas’ may
4 be allowed to produce, if any, are deferred to a later hearing.

5 3. **Deadlines.** Based on a stipulation among the Parties on the Motions:

6 a. Opposition briefs shall be filed and served by the Settling Parties and
7 Watermaster on or before Wednesday, October 12, 2022.

8 b. Reply briefs shall be filed and served by the Zamrzlas on or before Wednesday,
9 October 26, 2022.

10 4. **Briefing and Page Limits.** The Settling Parties may file one opposition of 30 pages or
11 less. The Zamrzlas may file one reply to the Settling Parties’ opposition of 20 pages or less. The
12 Watermaster may file separate briefing responding to the Zamrzlas’ claims within statutory page
13 limits. The Zamrzlas may file a reply to the Watermaster’s oppositions within statutory page limits.

14 5. **Discovery.**

15 a. The Parties concluded discovery on Monday, September 26, 2022.

16 b. Extending merits briefing and hearing schedule. If any party determines more
17 time is needed for discovery, that party shall file with the Court a written request for an extension
18 showing good cause.

19 6. **Experts.** Any expert testimony or report shall be limited to the issues set for the
20 December 13, 2022, hearing, as described in Section 2, above.

21 7. **Court reporter.** The Parties will provide for a court reporter for the hearing, and will
22 equally share the cost among the Settling Parties (1/3), Watermaster (1/3) and the Zamrzlas (1/3). If
23 any additional party decides to separately oppose the Zamrzlas’ Motions, the cost will be further
24 divided equally among the Parties and any additional party.

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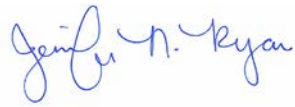
1 DATED: October 7, 2022

KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD
A Professional Corporation

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By: 
Eric N. Robinson
Jenifer N. Ryan
Attorneys for CITY OF LOS ANGELES and
LOS ANGELES WORLD AIRPORTS

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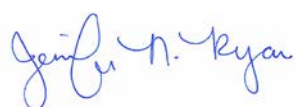
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DATED: October 7, 2022

LEBEAU THELEN LLP

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By: 
for
Robert G. Kuhs
Attorneys for GRIMMWAY ENTERPRISES

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DATED: October 7, 2022

LAGERLOF, LLP

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By: 
for
Thomas S. Bunn
Attorneys for PALMDALE WATER DISTRICT

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DATED: October 7, 2022

ELLISON, SCHNEIDER, HARRIS & DONLAN LLP

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By: 
for
Christopher M. Sanders
Attorneys for COUNTY SANITATION
DISTRICTS OF LOS ANGELES COUNTY NOS.
14 AND 20

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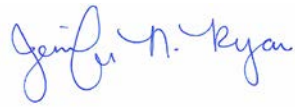
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DATED: October 7, 2022

PRICE, POSTEL & PARMA LLP

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By: 
for
Craig Parton
Attorneys for ANTELOPE VALLEY
WATERMASTER

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DATED: October 7, 2022

MATHENY SEARS LINKERT & JAIME, LLP

By: 

Nicholas R. Shepard
Attorneys for JOHNNY ZAMRZLA, PAMELLA
ZAMRZLA, JOHNNY LEE ZAMRZLA AND
JEANETTE ZAMRZLA

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~~X~~ **PROPOSED ORDER**

The Court having read the foregoing Stipulation, and good cause appearing, **IT IS SO ORDERED.**

DATED: October ____, 2022

Approved by the Court; signed version to follow.

Jack Komar

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF SACRAMENTO

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Sacramento, State of California. My business address is 1331 Garden Hwy, 2nd Floor, Sacramento, CA 95833.

On October 7, 2022, I served true copies of the following document(s) described as **STIPULATION REGARDING ZAMRZLAS' HEARING, DISCOVERY AND BRIEFING SCHEDULE; [PROPOSED] ORDER** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY ELECTRONIC TRANSMISSION: By submitting an electronic version of the document(s) to the parties, through the user interface at avwatermaster.org.

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

Executed on October 7, 2022, at Sacramento, California.

Sherry Ramirez