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Exempt from Filing Fees
Government Code § 6103

6 Attorneys for
7 Antelope Valley Watermaster

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF LOS ANGELES - CENTRAL DISTRICT**

11 Coordination Proceeding,
Special Title (Rule 1550(b))

Judicial Council Coordination
Proceeding No. 4408

13 **ANTELOPE VALLEY**
GROUNDWATER CASES

LASC Case No.: BC 325201

Santa Clara Court Case No. 1-05-CV-049053
Assigned to the Hon. Jack Komar, Judge of
the Santa Clara Superior Court

18 **AND ALL RELATED ACTIONS**

STIPULATION AND ~~[PROPOSED]~~
ORDER FOR CONTINUED HEARING
ON WATERMASTER'S MOTION FOR
MONETARY, DECLARATORY AND
INJUNCTIVE RELIEF AGAINST
RANCHO SIERRA PROPERTIES, LLC

Date: December 13, 2022
Time: 9:00 a.m.
Dept: Department 3 or Microsoft Teams

22 The Antelope Valley Watermaster ("**Watermaster**"), and Rancho Sierra Properties, LLC,
23 a California limited liability company ("**RSP**"), by and through their respective attorneys of
24 record, hereby agree and stipulate as follows:

- 25 1. On or about August 23, 2022, the Watermaster filed a motion against RSP pursuant
26 to the Judgment seeking monetary, declaratory and injunctive relief (the "**Motion**").
27 2. The hearing on the Motion was originally set for October 25, 2022 at 9:00 a.m., but
28 was continued to December 13, 2022 at 9:00 a.m. by Minute Order dated November 30, 2022.

1 3. On or about November 8, 2022, attorney John Schatz contacted the Watermaster
2 General Counsel to inform the Watermaster that he had been retained by RSP solely for purposes of
3 negotiating a settlement of the Motion, and not to oppose or otherwise litigate the Motion.

4 4. RSP does not dispute that it is a Small Pumper Class Member or that it owes the
5 amounts demanded by the Watermaster in the Motion, but has requested additional time to repay
6 the same and to come into compliance with the Judgment.

7 5. RSP has not filed any pleadings in response to the Motion, and acknowledges and
8 agrees that the time to do so has expired.

9 6. The Watermaster and RSP have entered into settlement negotiations in a good faith
10 effort to resolve the Motion without further litigation, and the initial terms of settlement were
11 considered by the Watermaster Board at its regular meeting on December 7, 2022 in closed session.

12 7. In order to allow the parties additional time to settle this matter without further
13 litigation, the parties hereby stipulate and agree as follows:

14 (a) The hearing on the Motion shall be continued to a date in February 2023, after the
15 Watermaster Board's next regular meeting on January 25, 2023, in order to allow the
16 parties to come to an agreement on terms of settlement, and for the Watermaster
17 Board to consider such terms during closed session at its next regular meeting.

18 (b) The agreed upon terms of settlement, if any, will be filed with the Court before the
19 continued hearing date, and if settlement cannot be reached by such date, then the
20 Court will consider and rule on the Motion on the date of the continued hearing.

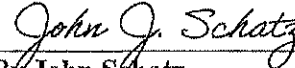
21 8. The parties agree that this Stipulation may be executed in counterparts, and
22 execution by facsimile shall be acceptable as an original.

23 Date: 12-12-22



PRICE, POSTEL & PARMA LLP
By Craig A. Parton
Attorneys for Watermaster

26
27 Date: 12-12-22



By John Schatz
Attorney for Rancho Sierra Properties

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~~PROPOSED~~ ORDER

IT IS HEREBY ORDERED THAT: The hearing on the Watermaster's Motion against RSP is continued to 2-17-22 @ 9am via Remote.

Date: 12-13-2022



HON. JACK KOMAR

1 PROOF OF SERVICE

2 STATE OF CALIFORNIA, COUNTY OF SANTA BARBARA

3 I am employed in the County of Santa Barbara, State of California. I am over the age of
4 eighteen (18) and not a party to the within action. My business address is 200 East Carrillo Street,
Fourth Floor, Santa Barbara, California 93101.

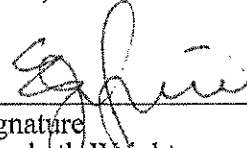
5 On December 12, 2022, I served the foregoing document described **STIPULATION AND**
6 **[PROPOSED] ORDER FOR CONTINUED HEARING ON WATERMASTER'S MOTION**
7 **FOR MONETARY, DECLARATORY AND INJUNCTIVE RELIEF AGAINSTE RANCHO**
SIERRA PROPERTIES, LLC on all interested parties in this action by placing the original
and/or true copy.

8
9 **BY ELECTRONIC SERVICE:** I posted the document(s) listed above to the Santa Clara
County Superior Court Website @ www.scefilng.org and Glotrans website in the action of
10 the Antelope Valley Groundwater Cases.

11 (*STATE*) I declare under penalty of perjury under the laws of the State of California that
the foregoing is true and correct.

12 (*FEDERAL*) I hereby certify that I am employed in the office of a member of the Bar of
13 this Court at whose direction the service was made.

14
15 Executed on December 12, 2022, at Santa Barbara, California.

16 
17 _____
Signature
Elizabeth Wright