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STIPULATION

Los Angeles Waterworks District No. 40, City of Palmdale, City of Lancaster, Littlerock Creek Irrigation District, Palm Ranch Irrigation District, Palmdale Water District, Quartz Hill Water District, Rosamond Community Services District, and California Water Service Company (collectively, the "Public Water Suppliers"), and Efren Chavez hereby enter into the following stipulation with _____.

Whereas, for purposes of the Phase 4 trial the above parties wish to enter into the following stipulation in lieu of taking depositions;

Whereas, Efren Chavez has signed the attached Declaration of _____ under penalty of perjury;

NOW, THEREFORE, in consideration and on the basis of the foregoing recitals, the Public Water Suppliers and Efren Chavez, enter into the following stipulation:

1. Based on the attached Declaration of Efren Chavez the Public Water Suppliers will forego taking the deposition of Efren Chavez during discovery for the Phase 4 trial set for February 11, 2013;
2. The attached Declaration may be used in the same manner at trial as a deposition transcript executed under penalty of perjury by Efren Chavez

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3. The Public Water Suppliers reserve the right to depose Efron Chavez during discovery for subsequent trial phases or in the event the Court continues the Phase 4 trial to a date other than February 11, 2013; and

4. The Public Water Suppliers reserve their right to challenge the testimony of Efron Chavez at trial.

Dated: January 17, 2013

BEST BEST & KRIEGER LLP

By

ERIC L. GARNER
JEFFREY V. DUNN
STEFANIE D. HEDLUND
Attorneys for Cross-Complainant
LOS ANGELES COUNTY WATERWORKS
DISTRICT NO. 40

Dated: January 17, 2013

By

JAMES L. MARKMAN
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CITY OF PALMDALE