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**EXEMPT FROM FILING FEES
UNDER GOVERNMENT CODE
SECTION 6103**

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

17 **ANTELOPE VALLEY**
GROUNDWATER CASES

18 Included Actions:
19 Los Angeles County Waterworks District
No. 40 v. Diamond Farming Co., Superior
20 Court of California, County of Los
Angeles, Case No. BC 325201;

21 Los Angeles County Waterworks District
22 No. 40 v. Diamond Farming Co., Superior
Court of California, County of Kern, Case
23 No. S-1500-CV-254-348;

24 Wm. Bolthouse Farms, Inc. v. City of
Lancaster, Diamond Farming Co. v. City of
25 Lancaster, Diamond Farming Co. v.
Palmdale Water Dist., Superior Court of
26 California, County of Riverside, Case Nos.
RIC 353 840, RIC 344 436, RIC 344 668

Judicial Council Coordination No. 4408

CLASS ACTION

Santa Clara Case No. 1-05-CV-049053
Assigned to The Honorable Jack Komar

**STIPULATION IN LIEU OF DEPOSITION
TESTIMONY FOR PHASE 4 TRIAL**

1 STIPULATION

2 Los Angeles Waterworks District No. 40, City of Palmdale, City of Lancaster, Littlerock Creek
3 Irrigation District, Palm Ranch Irrigation District, Palmdale Water District, Quartz Hill Water
4 District, Rosamond Community Services District, and California Water Service Company
5 (collectively, the "Public Water Suppliers"), and _____ hereby

6 enter into the following stipulation with Juniper Hills Water Group

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

9 **Whereas**, Juniper Hills Water Group has signed the attached Declaration of Billie Dickey
10 under penalty of perjury; and Randall Dickey

11 **NOW, THEREFORE**, in consideration and on the basis of the foregoing recitals, the
12 Public Water Suppliers and Juniper Hills Water Group, enter into the following stipulation:

13 1. Based on the attached Declaration of Billie Dickey and Randall Dickey, the Public Water
14 Suppliers will forego taking the deposition of Billie Dickey during discovery for the
15 Phase 4 trial set for February 11, 2013; and Randall Dickey

16 2. The attached Declaration may be used in the same manner at trial as a deposition
17 transcript executed under penalty of perjury by Billie Dickey and Randall Dickey

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

21 4. The Public Water Suppliers reserve their right to challenge the testimony of
22 Billie Dickey at trial.
23 and Randall Dickey

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Dated: January __, 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 __, 2013

By

JAMES L. MARKMAN
STEVEN ORR
Attorneys for Cross-Defendant
CITY OF PALMDALE

Dated: January __, 2013

By

DOUGLAS J. EVERTZ
Attorneys for Cross-Defendant
CITY OF LANCASTER AND
ROSAMOND COMMUNITY SERVICES
DISTRICT

Dated: January __, 2013

By

WAYNE LEMIEUX
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LITTLEROCK CREEK IRRIGATION
DISTRICT AND PALM RANCH
IRRIGATION DISTRICT

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Dated: January __, 2013

By _____
THOMAS BUNN III
Attorneys for Cross-Defendant
PALMDALE WATER DISTRICT

Dated: January __, 2013

By _____
BRADLEY T. WEEKS
Attorneys for Cross-Defendant
QUARTZ HILL WATER DISTRICT

Dated: January __, 2013

By _____
JOHN TOOTLE
Attorneys for Cross-Defendant
CALIFORNIA WATER SERVICE
COMPANY

Dated: January 27, 2013

By *Randall K. Dickey*
RANDALL K. DICKEY

Dated: January 27, 2013

By *Billie J. Dickey*
BILLIE J. DICKEY