

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 _____.

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**, Steven F. Godde has signed the attached Declaration of _____
10 under penalty of perjury;

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

13 1. Based on the attached Declaration of _____, the Public Water
14 Suppliers will forego taking the deposition of Steven F. Godde during discovery for the
15 Phase 4 trial set for February 11, 2013;

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 Steven F. Godde

18 3. The Public Water Suppliers reserve the right to depose Steven F. Godde
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

21 4. The Public Water Suppliers reserve their right to challenge the testimony of
22 Steven F. Godde at trial.

LAW OFFICES OF
BEST BEST & KRIEGER LLP
5 PARK PLAZA, SUITE 1500
IRVINE, CALIFORNIA 92614

LAW OFFICES OF
BEST BEST & KRIEGER LLP
3750 UNIVERSITY AVENUE, SUITE 400
P.O. BOX 1028
RIVERSIDE, CALIFORNIA 92502

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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 28, 2013

By Sten J. Jove