

STIPULATION

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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 SAHARA NURSERY hereby
6 enter into the following stipulation with MEHDI JAVADI.

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**, MEHDI JAVADI has signed the attached Declaration of SAHARA NURSERY
10 under penalty of perjury;

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

13 1. Based on the attached Declaration of MEHDI JAVADI, the Public Water
14 Suppliers will forego taking the deposition of MEHDI JAVADI 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 MEHDI JAVADI.

18 3. The Public Water Suppliers reserve the right to depose MEHDI JAVADI
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 MEHDI JAVADI at trial.

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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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1 Dated: January __, 2013

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By _____
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Attorneys for Cross-Defendant
PALMDALE WATER DISTRICT

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6 Dated: January __, 2013

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

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11 Dated: January __, 2013

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

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17 Dated: January 24, 2013

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By M. Javadi

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MEHDI JAVADI

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