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**LOS ANGELES COUNTY WATERWORKS**  
DISTRICT NO. 40

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

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**COUNTY WATERWORKS DISTRICT NO. 40**

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

**ANTELOPE VALLEY  
GROUNDWATER CASES**  
Included Actions:  
Los Angeles County Waterworks District  
No. 40 v. Diamond Farming Co., Superior  
Court of California, County of Los  
Angeles, Case No. BC 325201;  
Los Angeles County Waterworks District  
No. 40 v. Diamond Farming Co., Superior  
Court of California, County of Kern, Case  
No. S-1500-CV-254-348;  
Wm. Bolthouse Farms, Inc. v. City of  
Lancaster, Diamond Farming Co. v. City of  
Lancaster, Diamond Farming Co. v.  
Palmdale Water Dist., Superior Court of  
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**

**STIPULATION**

LAW OFFICES OF  
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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 \_\_\_\_\_ hereby  
enter into the following stipulation with RICHARD MINER.

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

Whereas, RICHARD MINER 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 RICHARD MINER, enter into the following stipulation:

1. Based on the attached Declaration of RICHARD MINER, the Public Water  
Suppliers will forego taking the deposition of RICHARD MINER 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 RICHARD MINER.

3. The Public Water Suppliers reserve the right to depose RICHARD MINER  
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  
RICHARD MINER at trial.

LAW OFFICES OF  
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1 Dated: January \_\_, 2013

BEST BEST & KRIEGER LLP

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By

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STEFANIE D. HEDLUND  
Attorneys for Cross-Complainant  
LOS ANGELES COUNTY  
WATERWORKS DISTRICT NO. 40

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8 Dated: January \_\_, 2013

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By

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

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14 Dated: January \_\_, 2013

15

By

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

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20 Dated: January \_\_, 2013

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By

WAYNE LEMIEUX  
Attorneys for Cross-Defendant  
LITTLE ROCK CREEK IRRIGATION  
DISTRICT AND PALM RANCH  
IRRIGATION DISTRICT

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1 Dated: January \_\_, 2013

2

By

THOMAS BUNN III  
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PALMDALE WATER DISTRICT

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6 Dated: January \_\_, 2013

7

By

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

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11 Dated: January \_\_, 2013

12

By

JOHN TOOTLE  
Attorneys for Cross-Defendant  
CALIFORNIA WATER SERVICE  
COMPANY

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17 Dated: January 25, 2013

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By Richard J. Miller 1/25/2013

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