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

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COUNTY WATERWORKS DISTRICT NO. 40

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
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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**

LAW OFFICES OF
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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 John A. Calandri hereby
6 enter into the following stipulation with John A. Calandri.

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**, John A. Calandri has signed the attached Declaration of J. A. Calandri
10 under penalty of perjury;

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

13 1. Based on the attached Declaration of John A. Calandri, the Public Water
14 Suppliers will forego taking the deposition of John A. Calandri 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 John A. Calandri

18 3. The Public Water Suppliers reserve the right to depose John A. Calandri
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 John A. Calandri at trial.

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Dated: January __, 2013

BEST BEST & KRIEGER LLP

By _____

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JEFFREY V. DUNN
STEFANIE D. HEDLUND
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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 _____

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

LAW OFFICES OF
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1 Dated: January __, 2013

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By _____
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Attorneys for Cross-Defendant
PALMDALE WATER DISTRICT

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 _____
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CALIFORNIA WATER SERVICE
COMPANY

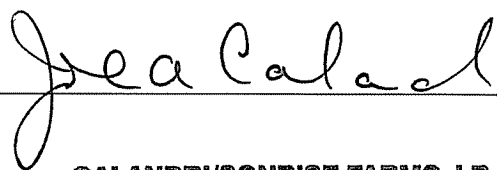
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17 Dated: January 24 2013

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By _____

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