

BROWNSTEIN HYATT FARBER SCHRECK, LLP
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4 21 East Carrillo Street
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8 Attorneys for: Gene T. Bahlman, William Barnes, William R. Barnes & Eldora M. Barnes Family
9 Trust of 1989, Thomas M. Bookman, B.J. Calandri, John Calandri, John Calandri as Trustee of the
10 John and B.J. Calandri 2001 Trust, Son Rise Farms, Calmat Land Company, Sal and Connie L.
11 Cardile, Efren and Luz Chavez, Consolidated Rock Products, Del Sur Ranch LLC, Steven Godde as
12 Trustee of the Forrest G. Godde Trust, Lawrence A. Godde, Lawrence A. Godde and Godde Trust,
13 Robert and Phillip Gorrindo, Gorrindo Family Trust, Laura Griffin, Healy Farms, Healy Enterprises,
14 Inc., John Javadi and Sahara Nursery, Juniper Hills Water Group, Gailen Kyle, Gailen Kyle as
15 Trustee of the Kyle Trust, James W. Kyle, James W. Kyle as Trustee of the Kyle Family Trust, Julia
16 Kyle, Wanda E. Kyle, Maritorena Living Trust, Jose and Marie Maritorena, Richard H. Miner, Barry
17 S. Munz, Terry A. Munz and Kathleen M. Munz, Eugene B. Nebeker, R and M Ranch, Inc., Richard
18 and Michael Nelson, Robert Jones, John and Adrienne Reca, Mabel Selak, Jeffrey L. & Nancee J.
19 Siebert, Dr. Samuel Kremen and Tierra Bonita Ranch Company, Beverly Tobias, Triple M Property
20 FKA and 3M Property Investment Co., Vulcan Materials Co. and Vulcan Lands Inc., Willow
21 Springs Company, Donna Wilson, collectively known as the Antelope Valley Groundwater
22 Agreement Association ("AGWA")

23 SUPERIOR COURT OF THE STATE OF CALIFORNIA
24 FOR THE COUNTY OF LOS ANGELES

25 ANTELOPE VALLEY
26 GROUNDWATER CASES

27 Included Actions:

28 Los Angeles County Waterworks District No.)
40 v. Diamond Farming Co. Superior Court of)
California County of Los Angeles, Case No. BC)
325 201 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,)
consolidated actions, Case No. RIC 353 840,)
RIC 344 436, RIC 344 668)

Judicial Council Coordination Proceeding
No. 4408

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

STIPULATION FOR PHASE IV TRIAL RE
2011-12 GROUNDWATER PUMPING BY
STEVE GODDE AND FORREST G.
GODDE 1998 TRUST

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Steve Godde and the Forrest G. Godde 1998 Trust, and the parties that have signed this Stipulation agree and stipulate, for the purposes of determining groundwater pumping during 2011 and 2012 for the Phase 4 trial only, as follows:

1. Groundwater pumping by Steve Godde and the Forrest G. Godde 1998 Trust during the calendar year 2011 was 1299 af.

2. Groundwater pumping by Steve Godde and the Forrest G. Godde 1998 Trust during the calendar year 2012 was 1624 af.

3. Consistent with the Court's Case Management Order, as amended, for the Phase 4 Four trial of this matter, Steve Godde and the Forrest G. Godde 1998 Trust and the undersigned parties reserve, for a future phase of this action, determination of all other facts and legal issues in this action, including but not limited to:

A. The determination of the groundwater rights of Steve Godde and the Forrest G. Godde 1998 Trust, including the applicability and application of all constitutional, statutory and decisional law;

B. The ability to introduce in a later trial phase evidence of water use in years other than 2011 and 2012; and

C. The determination of the reasonableness of water use by Steve Godde and the Forrest G. Godde 1998 Trust during the period 2000 to 2012.

[signatures on following pages]

BROWNSTEIN HYATT FARBER SCHRECK, LLP
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Dated: May 26, 2013

BROWNSTEIN HYATT FARBER
SCHRECK, LLP

By: Buddy J. Ace
MICHAEL T. FIFE
BRADLEY J. HERREMA
Attorneys for
ANTELOPE VALLEY GROUNDWATER
AGREEMENT ASSOCIATION

Dated: May 24 2013

BEST BEST & KRIEGER LLP

By: Eric L. Garner
ERIC L. GARNER
JEFFREY V. DUNN
STEFANIE D. HEDLUND
Attorneys for Cross-Complainant
LOS ANGELES COUNTY
WATERWORKS DISTRICT NO. 40

Dated: May __, 2013

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

Dated: May 27, 2013

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

1 Dated: May __, 2013

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

By Thomas S. Bunn III
THOMAS BUNN III
Attorneys for Cross-Defendant
PALMDALE WATER DISTRICT


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

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

BROWNSTEIN HYATT FARBES SCHRECK, LLP
21 Esri Canillo Street
Santa Barbara, CA 93101-2706

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Dated: May 2, 2013

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

Dated: May __, 2013

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

Dated: May __, 2013

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

Dated: May __, 2013

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