

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

22 SUPERIOR COURT OF THE STATE OF CALIFORNIA

23 FOR THE COUNTY OF LOS ANGELES

24 ANTELOPE VALLEY
25 GROUNDWATER CASES

26 Included Actions:

27 Los Angeles County Waterworks District No.
28 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
MEMBERS OF JUNIPER HILLS WATER
GROUP

1 Mark W. and Nancy L. Benz; Brittner Trust, Glen Brittner, Trustee; James and Elizabeth
2 Bridwell; Irma Ann Carle Trust, Irma-Anne Carle, Trustee; C. Louise R. Close Living Trust, c/o
3 Suzanne Lawrence; Anthony W. Denning and Kathryn G. Rairden; Lawrence Dean Evans, Jr. and
4 Susan Evans; Ruth C. Findley; Leah Frankenberg; Jean Indart; James M. Leer, III and Diana
5 Leer; Dennis M. and Diane K. McWilliams; Suzanne J. Richter; Ronald E. and Sharon Sugajski;
6 Turk Trust dated December 16, 1998; Marie A. Unini and Robert J. LeClair; Michael and Dolores
7 A. Weatherbie Trust of April 7, 2004; Anthony E. and Mary C. West; and Williams Family
8 Living Trust Dated 6/15/1999, Harlan Williams, Trustee, ("Juniper Hills Water Group members")
9 and the parties that have signed this Stipulation agree and stipulate, for the purposes of
10 determining groundwater pumping during 2011 and 2012 for the Phase 4 trial only, as follows:

11 1. Groundwater pumping by each of the above Juniper Hills Water Group members per
12 parcel during the calendar year 2011 was 1 af.

13 2. Groundwater pumping by each of the above Juniper Hills Water Group members per
14 parcel during the calendar year 2012 was 1 af.

15 3. Consistent with the Court's Case Management Order, as amended, for the Phase 4 Four
16 trial of this matter, each of the above Juniper Hills Water Group members and the undersigned
17 parties reserve, for a future phase of this action, determination of all other facts and legal issues in
18 this action, including but not limited to:

19 A. The determination of the groundwater rights of each of the above Juniper Hills Water
20 Group members, including the applicability and application of all constitutional, statutory and
21 decisional law;

22 B. The ability to introduce in a later trial phase evidence of water use in years other than
23 2011 and 2012; and

24 C. The determination of the reasonableness of water use by each of the above Juniper
25 Hills Water Group members during the period 2000 to 2012.

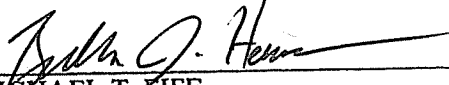
26 [signatures on following pages]
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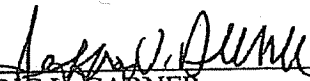
Dated: May 26, 2013

BROWNSTEIN HYATT FARBER
SCHRECK, LLP

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

Dated: May 24, 2013

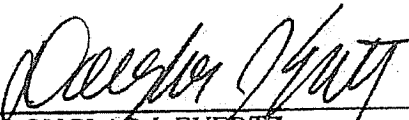
BEST BEST & KRIEGER LLP

By: 
ERIC L. GARNER
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
Attorneys for Cross-Defendant
CITY OF LANCASTER AND
ROSAMOND COMMUNITY SERVICES
DISTRICT

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Dated: May __, 2013

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

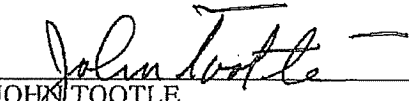
Dated: May __, 2013

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

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Santa Barbara, CA 93101-2706

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Dated: May __, 2013

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

Dated: May 24, 2013

By Thomas Bunn III
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

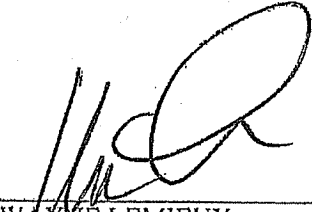
By _____
JOHN TOOTLE
Attorneys for Cross-Defendant
CALIFORNIA WATER SERVICE
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Dated: May 21, 2013

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