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Our File Number:
23641-1

November 28, 2022

VIA E-MAIL ONLY

Honorable Jack Komar
c/o Rowena Walker
Complex Civil Case Coordinator
Superior Court of California
County of Santa Clara
191 N. 1st Street, Departments 1 and 3
San Jose, CA 95113

RWalker@scscourt.org

Re: Scope and Timing of Hearings on Watermaster and Zamrzla Motions

Dear Judge Komar:

This letter is submitted jointly by the attorneys of record for the City of Los Angeles (Los Angeles World Airports), Grimmway Enterprises, Palmdale Water District, and County Sanitation Districts of Los Angeles County Nos. 14 and 20 (collectively, "Settling Parties"), the Antelope Valley Watermaster ("Watermaster"), and Johnny Zamrzla, Pamella Zamrzla, Johnny Lee Zamrzla and Jeanette Zamrzla ("Zamrzlas"), collectively referred to herein as the "Parties."

The following three Motions are currently set for hearing on December 13-14, 2022, starting at 9:00 a.m. in a location TBD:

(1) Motion by Johnny Zamrzla and Pamella Zamrzla to Set Aside or Modify Judgment ("J&P Motion");

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(2) Motion by Johnny Lee and Jeannette Zamrzla to Set Aside or Modify Judgment (collectively with the J&P Motion, the “Zamrzla Motions”); and

(3) Motion by the Watermaster for Monetary, Declaratory and Injunctive Relief Against the Zamrzlas (“Watermaster Motion”).

The undersigned have met and conferred as to the scope of evidence and oral argument necessary for the Court to consider the above-referenced Motions, and desire to limit the scope and timing of the hearings on the Motions as follows:

Zamrzla Motions

The Parties have agreed that the hearing on the Zamrzla Motions will be solely a law and motion hearing, without the presentation of any live testimony. In light of this, the hearing can be completed on December 13, 2022, and there is no need for the Court to reserve a December 14, 2022 hearing date. The Zamrzlas intend to appear in person and request an in-person hearing. Some of the Parties may appear at the hearing via Zoom and request to do so. The Parties request that the Court confirm the date, time and physical location of the hearing via minute order so that necessary arrangements can be made for travel, lodging, court reporter, etc.

Watermaster Motion

The Zamrzlas’ attorney who will be handling the Watermaster Motion, Wesley A. Miliband, is unavailable on December 13 and 14, 2022. In light of this, the Parties have agreed to continue the hearing on the Watermaster Motion to a mutually-acceptable date in January or February 2023, upon confirmation of the Court’s availability. The Parties will meet and confer regarding whether the hearing on the Watermaster Motion will include additional briefing and evidence. If so, the timing, nature and scope of additional briefing and/or evidence by any of the Parties will be determined after the conclusion of the hearing on the Zamrzla Motions by stipulation of the Parties and approval from the Court, or if a stipulation cannot be reached, then by hearing before the Court.

We appreciate the Court’s consideration of these requests, and welcome the opportunity to discuss via phone if necessary to finalize these changes.

(Signatures on following pages)

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DATED: November 28, 2022

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NOS. 14 AND 20

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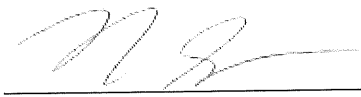
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DATED: November 28, 2022


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