

1 Bob H. Joyce, (SBN 84607)
2 LAW OFFICES OF
3 **LEBEAU • THELEN, LLP**
4 5001 East Commercenter Drive, Suite 300
Post Office Box 12092
Bakersfield, California 93389-2092
(661) 325-8962; Fax (661) 325-1127

5 Attorneys for DIAMOND FARMING COMPANY,
6 a California corporation, CRYSTAL ORGANIC
7 FARMS, a limited liability company, GRIMMWAY
8 ENTERPRISES, INC., and LAPIS LAND COMPANY, LLC

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

9 **IN AND FOR THE COUNTY OF LOS ANGELES**

11 Coordination Proceeding Special Title
12 (Rule 1550 (b))

Judicial Council Coordination No. 4408

13 ANTELOPE VALLEY GROUNDWATER
14 CASES

Case No.: 1-05-CV-049053

14 Included actions:

**STIPULATION RE: GROUNDWATER
PUMPING AND WATER USE BY
GRIMMWAY ENTERPRISES, INC.,
LAPIS LAND COMPANY, LLC,
DIAMOND FARMING COMPANY,
AND CRYSTAL ORGANIC FARMS**

15 Los Angeles County Waterworks District No.
16 40 vs. Diamond Farming Company
Los Angeles Superior Court
17 Case No. BC 325201

18 Los Angeles County Waterworks District No.
19 40 vs. Diamond Farming Company
Kern County Superior Court
Case No. S-1500-CV 254348 NFT

20 Diamond Farming Company vs. City of
21 Lancaster
Riverside County Superior Court
22 Lead Case No. RIC 344436 [Consolidated
w/Case Nos. 344668 & 353840]

23
24 **AND RELATED CROSS-ACTIONS.**

25 This stipulation is submitted by, and on behalf of the cross-defendants, DIAMOND FARMING
26 COMPANY, CRYSTAL ORGANIC FARMS, GRIMMWAY ENTERPRISES, INC., and LAPIS LAND
27 COMPANY, LLC.

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**STIPULATION RE: GROUNDWATER PUMPING AND WATER USE BY GRIMMWAY ENTERPRISES, INC.,
LAPIS LAND COMPANY, LLC, DIAMOND FARMING COMPANY, AND CRYSTAL ORGANIC FARMS**

1 Dated: _____, 2013

JEFFER, MANGELS, BUTLER & MARMARO, LLP

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3 By: _____
NEILL BROWER
KENNETH EHRLICH
Attorneys for City National Bank, Trustee

4
5 Dated: _____, 2013

LAW OFFICE OF MATTHEW A. KECES

6
7 By: _____
MATTHEW KECES
Attorneys for Lebata, Inc.

8
9 Dated: _____, 2013

10 By: _____
TERRI KENNEDY
Attorneys for Alice Lyon

11 Dated: _____, 2013

**KLEIN, DeNATALE, GOLDNER, COOPER,
ROSENLIEB & KIMBALL, LLP**

12
13 By: _____
JOSEPH HUGHES
Attorneys for H&N Development Co. West, Inc.

14
15 Dated: _____, 2013

KRAUSE, KALFAYAN, BENINK & SLAVENS, LLP

16
17 By: _____
RALPH KALFAYAN
Attorneys for the Willis Class


18
19 Dated: _____, 2013

**KRONICK, MOSKOVITZ, TIEDEMANN &
GIRARD**

20
21 By: _____
JANET GOLDSMITH
Attorneys for City of Los Angeles

22 Dated: 5-3-2013, 2013

KUHS & PARKER

23
24 By: 
ROBERT KUHS
Attorneys for Granite Construction Company,
Tejon Ranchcorp

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PROOF OF SERVICE

ANTELOPE VALLEY GROUNDWATER CASES
JUDICIAL COUNCIL PROCEEDING NO. 4408
CASE NO.: 1-05-CV-049053

I am a citizen of the United States and a resident of the county aforesaid; I am over the age of eighteen years and not a party to the within action; my business address is: 5001 E. Commercenter Drive, Suite 300, Bakersfield, California 93309. On May 3, 2013, I served the within **SIGNATURE OF ROBERT KUHS TO STIPULATION RE: GROUNDWATER PUMPING AND WATER USE BY GRIMMWAY ENTERPRISES, INC., LAPIS LAND COMPANY, LLC, DIAMOND FARMING COMPANY, AND CRYSTAL ORGANIC FARMS**

(BY POSTING) I am "readily familiar" with the Court's Clarification Order. Electronic service and electronic posting completed through www.scefilng.org ; All papers filed in Los Angeles County Superior Court and copy sent to trial judge and Chair of Judicial Council.

Los Angeles County Superior Court
111 North Hill Street
Los Angeles, CA 90012
Attn: **Department 1**
(213) 893-1014

Chair, Judicial Council of California
Administrative Office of the Courts
Attn: Appellate & Trial Court Judicial Services
(Civil Case Coordinator)
Carlotta Tillman
455 Golden Gate Avenue
San Francisco, CA 94102-3688
Fax (415) 865-4315

(BY MAIL) I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Bakersfield, California, in the ordinary course of business.

(OVERNIGHT/EXPRESS MAIL) By enclosing a true copy thereof in a sealed envelope designated by United States Postal Service (Overnight Mail)/Federal Express/United Parcel Service ("UPS") addressed as shown on the above by placing said envelope(s) for ordinary business practices from Kern County. I am readily familiar with this business' practice of collecting and processing correspondence for overnight/express/UPS mailing. On the same day that the correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service/Federal Express/UPS in a sealed envelope with delivery fees paid/provided for at the facility regularly maintained by United States Postal Service (Overnight Mail/Federal Express/United Postal Service [or by delivering the documents to an authorized courier or driver authorized by United States Postal Service (Overnight Mail)/Federal Express/United Postal Service to receive documents].

(STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct, and that the foregoing was executed on May 3, 2013, in Bakersfield, California.



LEQUETTA HANSEN