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11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **COUNTY OF LOS ANGELES**

13 Coordination Proceeding) Judicial Council Coordination
Special Title (Rule 1550(b))) Proceeding No. 4408
14)
ANTELOPE VALLEY GROUNDWATER)
CASES) **FEDERAL DEFENDANTS'**
15) **REPORT RE: SETTLEMENT**
16 Included actions:)
17 Los Angeles County Waterworks District No. 40 v.)
Diamond Farming Co., et al.)
18 Los Angeles County Superior Court, Case No. BC)
325 201)
19 Los Angeles County Waterworks District No. 40 v.)
Diamond Farming Co., et al.)
20 Kern County Superior Court, Case No. S-1500-CV-)
254-348)
21 Wm. Bolthouse Farms, Inc. v. City of Lancaster)
22 Diamond Farming Co. v. City of Lancaster)
Diamond Farming Co. v. Palmdale Water District)
23 Riverside County Superior Court, Consolidated)
24 Action, Case nos. RIC 353 840, RIC 344 436, RIC)
344 668)
25 **AND RELATED CROSS ACTIONS**)

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1 Cross-Defendant United States respectfully submits this report addressing settlement
2 efforts and progress. Counsel for the United States and representatives from the U.S. Air Force
3 attended the April 30 settlement conference mediated by Justice Robie. The settlement talks
4 continue to be productive. A comprehensive settlement in the form of a stipulated judgment and
5 physical solution has been proposed. While significant issues remain, parties are engaged in
6 constructive discussion on the elements of the proposed settlement document. Draft revisions of
7 the document are expected to be circulated and the editing process is expected to continue over
8 the course of the next several weeks. A follow-up settlement conference of all settling parties
9 was agreed-to and has been set for May 30, 2012.

10 Respectfully submitted this 1st day of May, 2012.

11
12 /s/
13 R. LEE LEININGER
14 JAMES J. DUBOIS
United States Department of Justice

PROOF OF SERVICE

I, Amber Petrie, declare:

I am a resident of the State of Colorado and over the age of 18 years, and not a party to the within action. My business address is U.S. Department of Justice, Environment and Natural Resources Section, 999 18th Street, South Terrace - Suite 370, Denver, Colorado 80202.

On May 1, 2012, I caused the foregoing document(s) described as: **FEDERAL DEFENDANTS' REPORT, RE: SETTLEMENT**, to be served on the parties via the following service:

BY ELECTRONIC SERVICE AS FOLLOWS by posting the document(s) listed above to the Santa Clara website in regard to the Antelope Valley Groundwater matter.

BY MAIL AS FOLLOWS (to parties so indicated on attached service list): By placing true copies thereof enclosed in sealed envelopes addressed as indicated on the attached service list.

BY OVERNIGHT COURIER: I caused the above-referenced document(s) be delivered to FEDERAL EXPRESS for delivery to the above address(es).

Executed on May 1, 2012 at Denver, Colorado.

/s/ Amber Petrie
Amber Petrie
Legal Assistant