

1 **RYAN S. BEZERRA, State Bar No. 178048**
2 **JOSHUA M. HOROWITZ, State Bar No. 186866**
3 **KATRINA C. GONZALES, State Bar No. 258412**
4 **BARTKIEWICZ, KRONICK & SHANAHAN**
5 **A PROFESSIONAL CORPORATION**
6 **1011 TWENTY-SECOND STREET**
7 **SACRAMENTO, CALIFORNIA 95816-4907**
8 **TELEPHONE: (916) 446-4254**
9 **TELECOPIER: (916) 446-4018**
10 **E-MAIL: rsb@bkslawfirm.com**

11 **Attorneys for Cross-Defendant**
12 **Copa De Oro Land Company**

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
14 **COUNTY OF LOS ANGELES**

15 **Coordination Proceeding Special Title**
16 **(Rule 1550(b))**

17 **ANTELOPE VALLEY GROUNDWATER**
18 **CASES**

19 **Included Actions:**

20 **Los Angeles County Waterworks District**
21 **No. 40 v. Diamond Farming Co., Superior**
22 **Court of California, County of Los Angeles,**
23 **Case No. BC 325 201;**

24 **Los Angeles County Waterworks District**
25 **No. 40 v. Diamond Farming Co., Superior**
26 **Court of California, County of Kern, Case**
27 **No. S-1500-CV-254-348;**

28 **Wm. Bolthouse Farms, Inc. v. City of**
Lancaster, Diamond Farming Co. v.
Lancaster, Diamond Farming Co. v.
Palmdale Water Dist., Superior Court of
California, County of Riverside, Case No.
RIC 353 840, RIC 344 436, RIC 344 668

JUDICIAL COUNCIL COORDINATION
PROCEEDING NO. 4408

Case No. BC 391869
Assigned to Hon. Jack Komar

(Santa Clara Case No. 01-05-CV-049053)

STIPULATION FOR PHASE IV TRIAL
CONCERNING COPA DE ORO LAND
COMPANY

8792/P043013rsb Stipulation

PHASE IV STIPULATION CONCERNING COPA DE ORO LAND COMPANY

1 STIPULATION

2 This Stipulation establishes facts stated below between Copa de Oro Land Company
3 ("Copa de Oro") and the undersigned party(ies). Subject to the reservation of rights below, the
4 undersigned party(ies) hereby stipulate that the facts stated in the following documents are
5 undisputed, may be treated by the Court as facts proven in open court and shall be binding for
6 all purposes in this action as between Copa de Oro and the undersigned party(ies):

- 7 1. The Declaration of Elliot Joelson for Copa de Oro Land Company and all
8 exhibits incorporated therein, posted to the Court's Web site on January 31,
9 2013 (<http://www.sceffiling.org/document/document.jsp?documentId=76507>);
10 and
11 2. The Stipulation for Phase IV Trial Regarding Water Use on Copa de Oro Land
12 Company's Property, posted to the Court's Web site on April 19, 2013
13 (<http://www.sceffiling.org/document/document.jsp?documentId=79881>).

14 Copa de Oro and the undersigned party(ies) reserve their respective rights to make all
15 legal arguments concerning each other's water rights, and introduce related evidence that does
16 not contradict the stipulated facts above, in any future phase of this matter.

17 Dated: April 30, 2013

BARTKIEWICZ, KRONICK & SHANAHAN

18 By: 
19 Ryan S. Bezerra

20 Attorneys for Copa de Oro Land Company

21
22 Dated: May 2, 2013

Herum Crabtree (Firm name)

23
24 By: 
25 William R. Carlson (Attorney name)

26 Attorneys for Antelope Valley Water
27 Storage, LLC (Client(s))
28

8792/P043013rsb Stipulation

PHASE IV STIPULATION CONCERNING COPA DE ORO LAND COMPANY