

1 Law Offices of  
2 **MATHENY SEARS LINKERT & JAIME, LLP**  
3 NICHOLAS R. SHEPARD, ESQ. (SBN 300629)  
4 3638 American River Drive  
5 Sacramento, California 95864  
6 Telephone: (916) 978-3434  
7 Facsimile: (916) 978-3430  
8 [nshepard@mathenysears.com](mailto:nshepard@mathenysears.com)

9 Attorneys for Defendants, JOHNNY ZAMRZLA,  
10 PAMELLA ZAMRZLA, JOHNNY LEE  
11 ZAMRZLA AND JEANETTE ZAMRZLA

12 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
13 COUNTY OF LOS ANGELES – CENTRAL DISTRICT

14 Coordinated Proceeding,  
15 Special Title (Rule 1550(b))

16 ANTELOPE VALLEY  
17 GROUNDWATER CASES.

Judicial Council Coordination  
Proceeding No.: 4408

LASC Case No. BC32501

Santa Clara Sup. Court Case No.: 1-05-CV-049053  
Assigned to Hon. Jack Komar, Judge of the Santa  
Clara County Superior Court

**DECLARATION OF NICHOLAS R.  
SHEPARD IN SUPPORT OF JOHNNY AND  
PAMELLA ZAMRZLA’S MOTION TO SET  
ASIDE OR MODIFY JUDGMENT**

**Date: May 3, 2022**  
**Time: 9:00 a.m.**

18 I, Nicholas R. Shepard, declare as follows:

19  
20  
21  
22 1. I am an attorney of law, duly licensed to practice before all the Courts in the State  
23 of California. I am a partner at Matheny Sears Linkert & Jaime, LLP., attorneys of record for  
24 Defendants JOHNNY ZAMRZLA, PAMELLA ZAMRZLA, JOHNNY LEE ZAMRZLA and  
25 JEANETTE ZAMRZLA. This declaration is based upon my personal knowledge and if called as  
26 a witness I could and would testify competently to the facts stated herein.  
27

28 2. The Zamrzlas previously filed objections to the Dunn Declaration, on December 6,

1 2021. A true and correct copy of the Zamrzlas' Evidentiary Objections to the Dunn Declaration, is  
2 attached to the Compendium of Evidence as Exhibit 5.

3 3. A court hearing in this matter was held March 4, 2022, before Judge Komar. A true  
4 and correct copy of relevant portions of the transcript of the March 4 hearing is attached to the  
5 Compendium of Evidence as Exhibit 6.

6 I declare under penalty of perjury under the laws of the State of California that the foregoing  
7 is true and correct of my own knowledge, and if called to do so, could and would competently  
8 testify to the matters set forth herein.

9 Executed on this 11<sup>th</sup> day of April 2022 at Sacramento, California.

10 

11 \_\_\_\_\_  
12 NICHOLAS R. SHEPARD

13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28