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10 Attorneys for Tejon Ranchcorp and Tejon Ranch Company

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12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
13
14 **COUNTY OF LOS ANGELES - CENTRAL DISTRICT**

15 ANTELOPE VALLEY GROUNDWATER
16 CASES

17 Included Actions:

18 Los Angeles County Waterworks District No. 40
19 v. Diamond Farming Co., Superior Court of
20 California, County of Los Angeles, Case No. BC
21 325201;

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

26 Wm. Bolthouse Farms, Inc. v. City of Lancaster,
27 Diamond Farming Co. v. Lancaster, Diamond
28 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 No. 4408

Santa Clara Case No. 1-05-CV-049053
Assigned to Hon. Jack Komar

**STIPULATION FOR PHASE 4
TRIAL REGARDING LAND
OWNERSHIP AND WATER USE ON
TEJON PROPERTY**

Phase 4 Trial Date: May 28, 2013
Time: 10:00 a.m.
Dept.: 322

I. STIPULATION

IT IS HEREBY STIPULATED by and between TEJON RANCHCORP and TEJON
RANCH COMPANY (collectively, Tejon) and the undersigned parties by and through their

1 respective counsel of record, that for purposes of the Phase 4 Trial the facts listed below are
2 undisputed and may be treated by the Court as facts proven in open court and shall be binding for
3 all purposes in the Phase 4 Trial.

4 1. Tejon holds fee title to approximately 33,530 acres of real property located within
5 the Antelope Valley Area of Adjudication (AVAA) as more particularly set forth in **Exhibit A**
6 attached hereto and incorporated herein by reference.

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8 2. The parties hereby stipulate to the following 2011 and 2012 groundwater
9 pumping on Tejon property:

Party	2011 Groundwater Pumping	2012 Groundwater Pumping
Tejon	1,603 acre-feet	2,749 acre-feet

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15 This Stipulation is entered pursuant to the Fifth Amended Case Management Order for
16 Phase 4 Trial. This Stipulation is only for the purpose of determining groundwater pumping
17 during 2011 and 2012. This Stipulation shall not result in any determination of any water right,
18 or the reasonableness of any party's water use or manner of applying water to the use. This
19 Stipulation will not preclude any party from introducing in a later trial phase evidence to support
20 its claimed water rights including, without limitation, evidence of water use in years other than
21 2011 and 2012. All parties reserve their rights to produce any evidence to support their claimed

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1 water rights and make any related legal arguments including, without limitation arguments based
2 on any applicable constitutional, statutory, or decisional authority.

3 Dated: May 23, 2013

KUHS & PARKER

4
5 By /s/ Robert G. Kuhs

6 ROBERT G. KUHS, Attorney for
7 TEJON RANCHCORP AND
8 TEJON RANCH COMPANY

9 Dated: May __, 2013

BEST BEST & KRIEGER, LLP

10
11 By _____

12 ERIC L. GARNER
13 JEFFREY V. DUNN
14 STEFANIE D. HEDLUND
15 Attorneys for Cross-Complainant
16 LOS ANGELES COUNTY WATERWORKS
17 DISTRICT NO. 40

18 Dated: May __, 2013

19 By _____

20 JAMES L. MARKMAN
21 STEVEN ORR
22 STEFANIE D. HEDLUND
23 Attorneys for Cross-Complainant
24 LOS ANGELES COUNTY WATERWORKS
25 DISTRICT NO. 40

26 Dated: May __, 2013

27 By _____

28 DOUGLAS J. EVERTZ
Attorneys for Cross-Defendant
CITY OF LANCASTER AND ROSAMOND
COMMUNITY SERVICES DISTRICT

(Signatures cont. on next page)

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Dated: May __, 2013

By _____
WAYNE LEMIEUX
Attorneys for Cross-Defendant
LITTLE ROCK CREEK IRRIGATION
DISTRICT AND PALM RANCH IRRIGATION
DISTRICT

Dated: May __, 2013

By _____
THOMAS BUNN III
Attorneys for Cross-Defendant
PALMDALE WATER DISTRICT

Dated: May __, 2013

By _____
BRADLEY T. WEEKS
Attorneys for Cross-Defendant
QUARTZ HILL WATER DISTRICT

Dated: May __, 2013

By _____
JOHN TOOTLE
Attorneys for Cross-Defendant
CALIFORNIA WATER SERVICE COMPANY

Dated: May __, 2013

By _____
Attorneys for Cross-Defendant