
Subject: FW: Antelope Valley Adjudication: Draft Judgment and Stipulation
Attachments: Signature Pg (Executed) to Stip & Physical Solution-George Lane.pdf; Signature Pg (Executed) to Stip & Physical Solution-Radia.pdf; Signature Pg (Executed) to Stip & Physical Solution-Burrows.pdf

From: Ted Chester
Sent: Friday, February 20, 2015 4:25 PM
To: 'Dubois, James (ENRD)'
Subject: RE: Antelope Valley Adjudication: Draft Judgment and Stipulation

Jim,

Attached are the signature pages for my clients: Landinv, Inc.; Bruce Burrows; 300 A 40 H, LLC; The George and Charlene Lane Family Trust; The Frank and Yvonne Lane 1993 Family Trust; Little Rock Sand and Gravel, Inc.; Monte Vista Building Sites, Inc.; and A.V. Materials, Inc. I understand that these signature pages will be held in trust/escrow pursuant to your email below. Also, the signature of Little Rock Sand and Gravel, Inc. is provided with the understanding that the subdivision of the joint allocation to Granite and Little Rock shown on Ex. 4 of the proposed judgment remains unresolved, and such subdivision will be addressed and resolved at a later time.

Ted

From: Dubois, James (ENRD) [<mailto:James.Dubois@usdoj.gov>]
Sent: Tuesday, February 17, 2015 3:55 PM
To: 'Daphne Borromeo Hall'; 'Casey, Ed'; 'jtootle@calwater.com'; 'jgoldsmith@kmtg.com'; 'franksatalino@sbcglobal.net'; 'lmcclhane@bmbllawoffice.com'; 'DEvertz@murphyevertz.com'; 'TomBunn@lagerlof.com'; 'BJoyce@lebeauthelen.com'; 'mike@mclachlanlaw.com'; 'Brady, Andrew'; 'wsloan@mofa.com'; 'jgreen@grimmway.com'; 'cms@eslawfirm.com'; 'keith@Lemieux-Oneill.com'; 'Brad@charltonweeks.com'; 'erenwick@hanmor.com'; 'wcarlson@herumcrabtree.com'; 'ajr@bkslawfirm.com'; 'RSB@bkslawfirm.com'; 'jlewis@walshdelaney.com'; 'Rusinek, Walter E.'; 'Wwellen@counsel.lacounty.gov'; 'Michael.Davis@greshamsavage.com'; 'rgkuhs@kuhsparkerlaw.com'; 'noah.goldenkrasner@doj.ca.gov'; Ted Chester; 'Jeffrey V. Dunn (jeffrey.dunn@bbklaw.com)'; 'marilyn.levin@doj.ca.gov'; 'rmyers@clifford-brownlaw.com'; 'eric.garner@bbklaw.com'; 'mfife@bhfs.com'; Scott Kune; Wendy Wang (Wendy.Wang@bbklaw.com); Jmarkman@rwglaw.com; jim@mcmurtreyhartsock.com; JHughes@KleinLaw.com; 'Richard Zimmer (RZimmer@clifford-brownlaw.com)'; Arnold K. Graham; bbrunick@bmklawplc.com; OYARZO, EDWIN M GS-14 USAF HAF AFCEC/AFLOA-JACE-WR; Seidel, Warren Civ USAF AFMC 412 TW/JA
Cc: Leininger, Lee (ENRD); Himebaugh, Laurie (ENRD); Dubois, James (ENRD)
Subject: Antelope Valley Adjudication: Draft Judgment and Stipulation
Importance: High

Colleagues:

Attached please find a spreadsheet showing the parties from whom I have received an actual PDF signature, as opposed to mere assurance that a signature is in hand. Please make sure that everyone who will be signing the stipulation is included on the spreadsheet for tracking purposes. If you think someone has been inadvertently omitted, please let me know. If you think someone should be removed let me know.

Given that we have assured the Court that we will be filing Stipulations on the 26th of this month, I propose the following:

- 1) Those who have signed stipulations, please send me a pdf of the signature(s) as soon as possible. **SINCE MIKE MCLACHLAN WILL BE FILING THE STIPULATION WITH HIS MOTION FOR APPROVAL OF THE CLASS**

SETTLEMENT, AND MIKE WILL BE UNAVAILABLE AFTER MIDMORNING ON 2/26, ALL SIGNATURES NEED TO BE SENT TO THE THREE ADDRESSES IN THE CC LINE BY COB ON FEBRUARY 25TH.

- 2) We will “escrow” the signatures and compile a complete document to provide to Mike. That package will include the Stipulation, signature pages and the December 10, 2014 version of the Judgment that folks have been getting approval for. If we don’t close on the 26th, nothing will be done with the signatures we receive.
- 3) NOTHING will be filed on the 26th, or sent to Mike for filing, unless the U.S., Waterworks 40 and the Small Pumper Class have all signed the stipulation. We understand that without these major players we do not really have any “deal”. The United States’ approval is still in process, but those with authority are aware of the deadlines we are working with and I expect we will be able to meet the deadline.
- 4) We will keep track of signatures received and send out an update on Monday, February 23rd. Feel free to lean on anyone who has not provided a signature.
- 5) At the close of business on the 25th we will send out the status of signatures and try to address any issue that have arisen.
- 6) Assuming completion, we will send the entire package to Mike and the rest of the parties early on the 26th. They will all become exhibits to Mike’s motion.

Jim

James J. DuBois
U.S. Department of Justice
Environment & Natural Resources Division
999 18th Street
South Terrace - Suite 370
Denver, CO 80202
Phone: (303) 844-1375
FAX: (303) 844-1350
E-mail: james.dubois@usdoj.gov