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13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

14 **COUNTY OF LOS ANGELES**

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16 Coordination Proceeding
17 ANTELOPE VALLEY GROUNDWATER
CASES,
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Los Angeles County Waterworks District No.
19 40 v. Diamond Farming Co.
20 Los Angeles County Waterworks District No.
40 v. Diamond Farming Co.
21 Wm Bolthouse Farms, Inc. v. City of
22 Lancaster
23 Diamond Farming Co. v. City of Lancaster
24 Diamond Farming Co. v. Palmdale Water
District,
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26 AND RELATED ACTIONS
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Judicial Council Coordination
Proceeding No. 4408

**STIPULATION REGARDING
ZAMRZLAS' HEARING, DISCOVERY
AND BRIEFING SCHEDULE;
[PROPOSED] ORDER**

The Hon. Jack Komar, Dept. 17
Santa Clara Case No. 105 CV 049053

Riverside County Superior Court
Lead Case No. RIC 344436
Case No. RIC 344668
Case No. RIC 353840
Los Angeles Superior Court Case
No. BC 325201
Kern County Superior Court Case
No. S-1500-CV-254348

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1 August 15, 2022.

2 4. **Briefing and Page Limits.** The Settling Parties may file one opposition of 30 pages
3 or less. The Zamrzlas may file one reply to the Settling Parties' opposition of 20 pages or less. The
4 Watermaster may file separate briefing responding to the Zamrzlas' claims within statutory page
5 limits. The Zamrzlas may file a reply to the Watermaster's oppositions within statutory page limits.

6 5. **Discovery.**

7 a. The Parties are permitted to conduct discovery as to any other party, per the
8 Code of Civil Procedure and subject to the terms of this Stipulation.

9 b. Scope of Discovery. Discovery is limited to the scope of the issues to be
10 addressed at the August 23, 2022 hearing, as described above in Section 2.

11 c. Discovery cutoff. Based on an August 23, 2022, hearing date on the Motions
12 and Code of Civil Procedure, the discovery cutoff will be on Monday, July 25, 2022.

13 d. Depositions. The Parties agree to review and to provide signed deposition
14 transcripts within 10 days from receipt. Depositions of the Zamrzlas will take place in Sacramento,
15 California, unless otherwise agreed by the Parties.

16 e. Written discovery. The Parties agree to shorten the time for written discovery
17 responses to 20 days from service of discovery requests.

18 f. Disputes. If there are any discovery disputes that the Parties cannot settle
19 among themselves, the Parties will ask the Court's clerk to schedule a teleconference with the Court
20 to resolve the dispute informally.

21 g. Extending discovery and merits briefing and hearing schedule. If any party
22 determines more time is needed for discovery, that party shall file with the Court a written request
23 for an extension showing good cause.


24 6. **Experts.** Electronic exchange of expert disclosures shall be made by 5:00 p.m. on
25 Monday, June 20, 2022. Electronic exchange of rebuttal experts shall be made by 5:00 p.m. on
26 Monday, July 11, 2022. Any expert testimony or document shall be limited to the issues set for the
27 August 23, 2022, hearing, as described in Section 2, above. Expert disclosures will be made
28 according to the California Code of Civil Procedure. Expert depositions can be conducted on 7 days

1 electronic notice. Expert deposition transcript review and signature must be completed within 10
2 days of receipt.

3 7. **Court Reporter.** The Parties will provide for a court reporter for the hearing, and
4 will equally share the cost among the Settling Parties (1/3), Watermaster (1/3) and the Zamrzlas
5 (1/3). If any additional party decides to separately oppose the Zamrzlas' Motions, the cost will be
6 further divided equally among the Parties and any additional party.


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8 DATED: May 13, 2022

KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD
A Professional Corporation

10 By:  For
11 Eric N. Robinson
12 Jenifer N. Ryan
13 Attorneys for CITY OF LOS ANGELES and
LOS ANGELES WORLD AIRPORTS


14 DATED: May 13, 2022

LEBEAU THELEN LLP

16 By:  For
17 Robert G. Kuhs
18 Attorneys for GRIMMWAY ENTERPRISES

19 DATED: May 13, 2022

LAGERLOF, LLP


21 By:  For
22 Thomas S. Bunn
23 Attorneys for PALMDALE WATER DISTRICT
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1 DATED: May 13, 2022

ELLISON, SCHNEIDER, HARRIS & DONLAN LLP

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By:  For
Christopher M. Sanders
Attorneys for COUNTY SANITATION
DISTRICTS OF LOS ANGELES COUNTY NOS.
14 AND 20

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7 DATED: May 13, 2022

PRICE, POSTEL & PARMA LLP

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By:  For
Craig Parton
Attorneys for ANTELOPE VALLEY
WATERMASTER

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13 DATED: May ___, 2022

MATHENY SEARS LINKERT & JAIME, LLP

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By: _____
Nicholas R. Shepard
Attorneys for JOHNNY ZAMRZLA, PAMELLA
ZAMRZLA, JOHNNY LEE ZAMRZLA AND
JEANETTE ZAMRZLA

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1 DATED: May __, 2022

ELLISON, SCHNEIDER, HARRIS & DONLAN LLP

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By: _____

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Christopher M. Sanders

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Attorneys for COUNTY SANITATION

6

DISTRICTS OF LOS ANGELES COUNTY NOS.

14 AND 20

7 DATED: May __, 2022

PRICE, POSTEL & PARMA LLP

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By: _____

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Craig Parton

11

Attorneys for ANTELOPE VALLEY

WATERMASTER

12

13 DATED: May 13, 2022

MATHENY SEARS LINKERT & JAIME, LLP

14

15

By: _____



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Nicholas R. Shepard

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Attorneys for JOHNNY ZAMRZLA, PAMELLA

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ZAMRZLA, JOHNNY LEE ZAMRZLA AND

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JEANETTE ZAMRZLA

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[PROPOSED] ORDER

The Court having read the foregoing Stipulation, and good cause appearing, **IT IS SO ORDERED.**

DATED: May ____, 2022

Jack Komar

3 **PROOF OF SERVICE**

4 **STATE OF CALIFORNIA, COUNTY OF SACRAMENTO**

5 At the time of service, I was over 18 years of age and not a party to this action. I am
6 employed in the County of Sacramento, State of California. My business address is 1331 Garden
Hwy, 2nd Floor, Sacramento, CA 95833.

7 On May 13, 2022, I served true copies of the following document(s) described as
8 **STIPULATION REGARDING ZAMRZLAS' HEARING, DISCOVERY AND BRIEFING
SCHEDULE; [PROPOSED] ORDER** on the interested parties in this action as follows:

9 **BY ELECTRONIC TRANSMISSION:** By submitting an electronic version of the
document(s) to the parties, through the user interface at avwatermaster.org.

10 I declare under penalty of perjury under the laws of the State of California that the foregoing
11 is true and correct.

12 Executed on May 13, 2022, at Sacramento, California.

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Terri Whitman