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A Professional Corporation  
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8 MICHAEL N. FEUER, State Bar No. 111529  
Los Angeles City Attorney  
JOSEPH BRAJEVICH, General Counsel, Water and Power  
9 BRIAN C. OSTLER, General Counsel, Los Angeles World Airports  
Attorneys for Defendant CITY OF LOS ANGELES and  
10 LOS ANGELES WORLD AIRPORTS  
11 Attorneys for Cross-Defendants City of Los  
Angeles and Los Angeles World Airports  
12

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

14 **COUNTY OF LOS ANGELES**  
15

16 Coordination Proceeding  
17 ANTELOPE VALLEY GROUNDWATER  
CASES,  
18  
19 Los Angeles County Waterworks District No.  
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,  
25

26 AND RELATED ACTIONS  
27  
28

Judicial Council Coordination  
Proceeding No. 4408

**NOTICE OF ENTRY OF 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

1 **TO ALL PARTIES HEREIN AND TO THEIR ATTORNEYS OF RECORD:**

2 PLEASE TAKE NOTICE that the Stipulation Regarding Zamrzlas' Hearing, Discovery and  
3 Briefing Schedule and Order was entered on June 29, 2022. A true and correct copy is attached hereto  
4 as Exhibit "A."

5 DATED: July 7, 2022

KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD  
A Professional Corporation

6  
7  
8 By: 

Eric N. Robinson  
Jenifer N. Ryan  
Attorneys for Defendant CITY OF LOS  
ANGELES and  
LOS ANGELES WORLD AIRPORTS

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 July 7, 2022, I served true copies of the following document(s) described as **NOTICE**  
8 **OF ENTRY OF 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 is true and correct.

11 Executed on July 7, 2022, at Sacramento, California.

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15 Sherry Ramirez  
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# EXHIBIT A

1 ERIC N. ROBINSON, State Bar No. 191781

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8 Los Angeles City Attorney

JOSEPH BRAJEVICH, General Counsel, Water and Power

9 BRIAN C. OSTLER, General Counsel, Los Angeles World Airports

Attorneys for CITY OF LOS ANGELES and

10 LOS ANGELES WORLD AIRPORTS

11 Attorneys for City of Los Angeles and Los

12 Angeles World Airports

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

14 **COUNTY OF LOS ANGELES**

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16 Coordination Proceeding

17 ANTELOPE VALLEY GROUNDWATER  
18 CASES,

19 Los Angeles County Waterworks District No.  
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20 Los Angeles County Waterworks District No.  
21 40 v. Diamond Farming Co.

22 Wm Bolthouse Farms, Inc. v. City of  
Lancaster

23 Diamond Farming Co. v. City of Lancaster

24 Diamond Farming Co. v. Palmdale Water  
25 District,

26 AND RELATED ACTIONS

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

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No. S-1500-CV-254348

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1 a. Opposition briefs shall be filed and served by the Settling Parties and  
2 Watermaster on or before Friday, October 7, 2022.

3 b. Reply briefs shall be filed and served by the Zamrzlas on or before Monday,  
4 October 17, 2022.

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

9 5. **Discovery.**

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

12 b. Scope of Discovery. Discovery is limited to the scope of the issues to be  
13 addressed at the October 25, 2022 hearing, as described above in Section 2.

14 c. Discovery cutoff. Based on an October 25, 2022, hearing date on the Motions  
15 and Code of Civil Procedure, the discovery cutoff will be on Monday, September 26, 2022.

16 d. Depositions. The Parties agree to review and to provide signed deposition  
17 transcripts within 10 days from receipt. Depositions of the Zamrzlas will take place in Bakersfield,  
18 California, unless otherwise agreed by the Parties. The depositions of the Zamrzlas will take place  
19 between August 17-19, 2022, and will continue day to day until completed.

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

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

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

28 6. **Experts.** Electronic exchange of expert disclosures shall be made by 5:00 p.m. on

1 Friday, August 19, 2022. Electronic exchange of rebuttal experts shall be made by 5:00 p.m. on  
2 Friday, September 9, 2022. Any expert testimony or document shall be limited to the issues set for the  
3 October 25, 2022, hearing, as described in Section 2, above. Expert disclosures will be made  
4 according to the California Code of Civil Procedure. Expert depositions can be conducted on 7 days  
5 electronic notice. Expert deposition transcript review and signature must be completed within 10 days  
6 of receipt.

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

11  
12 DATED: June 22, 2022

KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD  
A Professional Corporation

13  
14  
15 By:



Eric N. Robinson

Jenifer N Ryan

Attorneys for CITY OF LOS ANGELES and  
LOS ANGELES WORLD AIRPORTS

16  
17  
18 DATED: June 22, 2022

LEBEAU THELEN LLP

19  
20  
21 By:



for

Robert G. Kuhs

Attorneys for GRIMMWAY ENTERPRISES

22  
23 DATED: June 22, 2022

LAGERLOF, LLP

24  
25  
26 By:



for

Thomas S. Bunn

Attorneys for PALMDALE WATER DISTRICT



1 DATED: June 22, 2022

ELLISON, SCHNEIDER, HARRIS & DONLAN LLP

2  
3 By:



for

4 Christopher M. Sanders  
5 Attorneys for COUNTY SANITATION  
6 DISTRICTS OF LOS ANGELES COUNTY NOS.  
14 AND 20

7 DATED: June 22, 2022

PRICE, POSTEL & PARMA LLP

8  
9 By:



for

10 Craig Parton  
11 Attorneys for ANTELOPE VALLEY  
12 WATERMASTER

13 DATED: June \_\_, 2022

MATHENY SEARS LINKERT & JAIME, LLP

14  
15 By:

16 Nicholas R. Shepard  
17 Attorneys for JOHNNY ZAMRZLA, PAMELLA  
18 ZAMRZLA, JOHNNY LEE ZAMRZLA AND  
19 JEANETTE ZAMRZLA  
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DATED: June \_\_, 2022

LAGERLOF, LLP

By: \_\_\_\_\_  
Thomas S. Bunn  
Attorneys for PALMDALE WATER DISTRICT

DATED: June \_\_, 2022

ELLISON, SCHNEIDER, HARRIS & DONLAN LLP

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


DATED: June \_\_, 2022

PRICE, POSTEL & PARMA LLP

By: \_\_\_\_\_  
Craig Parton  
Attorneys for ANTELOPE VALLEY  
WATERMASTER

DATED: June 21, 2022

MATHENY SEARS LINKERT & JAIME, LLP

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

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**[PROPOSED] ORDER**

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

DATED: June 19, 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 June 22, 2022, I served true copies of the following document(s) described as  
8 **STIPULATION REGARDING ZAMRZLAS' HEARING, DISCOVERY AND BRIEFING**  
9 **SCHEDULE; [PROPOSED] ORDER** on the interested parties in this action as follows:

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

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

14 Executed on June 22, 2022, at Sacramento, California.

15 

16 Sherry Ramirez