1	ERIC N. ROBINSON, State Bar No. 191781	
2	erobinson@kmtg.com STANLEY C. POWELL, State Bar No. 254057	
3	spowell@kmtg.com JENIFER N. RYAN, State Bar No. 311492	
4	jryan@kmtg.com KRONICK, MOSKOVITZ, TIEDEMANN & G	JIRARD
5	A Professional Corporation 1331 Garden Highway, 2nd Floor	
6	Sacramento, California 95833 Telephone: (916) 321-4500	
7	Facsimile: (916) 321-4555	
8	MICHAEL N. FEUER, State Bar No. 111529 Los Angeles City Attorney	
9	JOSEPH BRAJEVICH, General Counsel, Water BRIAN C. OSTLER, General Counsel, Los Ang	geles World Airports
10	Attorneys for Defendant CITY OF LOS ANGE LOS ANGELES WORLD AIRPORTS	LES and
11	Attorneys for Cross-Defendants City of Los	
12	Angeles and Los Angeles World Airports	
13	SUPERIOR COURT OF TI	HE STATE OF CALIFORNIA
14	COUNTY OF LOS ANGELES	
15		
16	Coordination Proceeding	Judicial Council Coordination Proceeding No. 4408
17	ANTELOPE VALLEY GROUNDWATER CASES,	NOTICE OF ENTRY OF ORDER
18		
19	Los Angeles County Waterworks District No. 40 v. Diamond Farming Co.	The Hon. Jack Komar, Dept. 17
20	40 v. Diamonu Farming Co.	Santa Clara Case No. 105 CV 049053
	Los Angeles County Waterworks District No.	Riverside County Superior Court
21	Los Angeles County Waterworks District No. 40 v. Diamond Farming Co.	Riverside County Superior Court Lead Case No. RIC 344436 Case No. RIC 344668
21 22	Los Angeles County Waterworks District No.	Riverside County Superior Court Lead Case No. RIC 344436 Case No. RIC 344668 Case No. RIC 353840 Los Angeles Superior Court Case
	Los Angeles County Waterworks District No. 40 v. Diamond Farming Co. Wm Bolthouse Farms, Inc. v. City of	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
22	Los Angeles County Waterworks District No. 40 v. Diamond Farming Co. Wm Bolthouse Farms, Inc. v. City of Lancaster Diamond Farming Co. v. City of Lancaster Diamond Farming Co. v. Palmdale Water	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
22 23	Los Angeles County Waterworks District No. 40 v. Diamond Farming Co. Wm Bolthouse Farms, Inc. v. City of Lancaster Diamond Farming Co. v. City of Lancaster	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
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 22 23 24 25 26 	Los Angeles County Waterworks District No. 40 v. Diamond Farming Co. Wm Bolthouse Farms, Inc. v. City of Lancaster Diamond Farming Co. v. City of Lancaster Diamond Farming Co. v. Palmdale Water District,	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

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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
6		A Professional Corporation
7		By: Jendy n. Kyan
8		Eric N. Robinson
9		Jenifer N. Ryan Attorneys for Defendant CITY OF LOS
10 11		ANGELES and LOS ANGELES WORLD AIRPORTS
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2	Judicial Council Coordination Proceeding No. 4408 For Filing Purposes Only: Santa Clara County Case No.: 1-05-CV-049053
2	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 employed in the County of Sacramento, State of California. My business address is 1331 Garden Hwy, 2nd Floor, Sacramento, CA 95833.
6 7	On July 7, 2022, I served true copies of the following document(s) described as NOTICE OF ENTRY OF ORDER on the interested parties in this action as follows:
8 9	BY ELECTRONIC TRANSMISSION: By submitting an electronic version of the document(s) to the parties, through the user interface at avwatermaster.org.
9 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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14	Sharry Doming
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EXHIBIT A

1 2	ERIC N. ROBINSON, State Bar No. 191781 erobinson@kmtg.com STANLEY C. POWELL, State Bar No. 254057	
3	spowell@kmtg.com JENIFER N. RYAN, State Bar No. 311492	
_	jryan@kmtg.com	
4 5	KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD A Professional Corporation 1331 Garden Highway, 2nd Floor	
6	Sacramento, California 95833 Telephone: (916) 321-4500 Facsimile: (916) 321-4555	
7		
8	MICHAEL N. FEUER, State Bar No. 111529 Los Angeles City Attorney	
9	JOSEPH BRAJEVICH, General Counsel, Water BRIAN C. OSTLER, General Counsel, Los Ang	
10	Attorneys for CITY OF LOS ANGELES and LOS ANGELES WORLD AIRPORTS	
11	Attorneys for City of Los Angeles and Los Angeles World Airports	
12		
13	SUPERIOR COURT OF TH	IE STATE OF CALIFORNIA
14	COUNTY OF LOS ANGELES	
15		
16	Coordination Proceeding	Judicial Council Coordination Proceeding No. 4408
17	ANTELOPE VALLEY GROUNDWATER CASES,	STIPULATION REGARDING
18	Los Angeles County Waterworks District No.	ZAMRZLAS' HEARING, DISCOVERY AND BRIEFING SCHEDULE;
19	40 v. Diamond Farming Co.	[PROPOSED] ORDER
20	Los Angeles County Waterworks District No. 40 v. Diamond Farming Co.	The Hon. Jack Komar, Dept. 17 Santa Clara Case No. 105 CV 049053
21	Wm Bolthouse Farms, Inc. v. City of	Riverside County Superior Court
22	Lancaster	Lead Case No. RIC 344436 Case No. RIC 344668
23	Diamond Farming Co. v. City of Lancaster	Case No. RIC 353840 Los Angeles Superior Court Case
24	Diamond Farming Co. v. Palmdale Water	No. BC 325201 Kern County Superior Court Case
25	District,	No. S-1500-CV-254348
26	AND RELATED ACTIONS	
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		RING, DISCOVERY AND BRIEFING SCHEDULE; ED] ORDER
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1	STIPULATION	
2	The City of Los Angeles (Los Angeles World Airports), Grimmway Enterprises, Palmdale	
3	Water District, County Sanitation Districts of Los Angeles County Nos. 14 and 20 (collectively,	
4	"Settling Parties"), Antelope Valley Watermaster, and Johnny Zamrzla, Pamella Zamrzla, Johnny Lee	
5	Zamrzla and Jeanette Zamrzla ("Zamrzlas"), by and through their respective attorneys of record	
6	(individually, "Party" and collectively, "Parties"), stipulate and agree as follows:	
7	RECITALS	
8	A. The Court granted the Settling Parties' ex parte application to continue the May 3,	
9	2022, hearing on the Zamrzlas' Motions to Set Aside or Modify the Judgment ("Motions") to 9 a.m.	
10	on August 9, 2022.	
11	B. The Court directed the Parties to meet and confer and to inform the Court of the	
12	outcome of their meet-and-confer efforts on the following: (1) hearing date and length; (2) venue; (3)	
13	discovery and briefing deadlines; and (4) court reporter.	
14	C. The Parties on April 22, 2022, met and conferred on the issues designated by the Court	
15	and reached agreement as set forth in the May 14, 2022, Order regarding the Zamrzlas' Hearing,	
16	Discovery and Briefing Schedule.	
17	D. On June 20, 2022, the Parties agreed to continue the dates for discovery, briefing and	
18	the hearing as set forth below.	
19	IT IS HEREBY STIPULATED AND AGREED THAT:	
20	1. Hearing date and venue. The August 23, 2022, hearing date on the Motions is vacated	
21	and rescheduled to start at 9 a.m. on Tuesday, October 25, 2022. The hearing is estimated to last two	
22	days and will take place in Department 17 of the Santa Clara County Superior Court located at 161	
23	North First Street, San Jose, California 95113.	
24	2. Scope. The scope of issues for discovery and to be tried at the hearing will be limited	
25	to whether the Zamrzlas are bound by the Judgment and Physical Solution entered on December 28,	
26	2015, as raised by the Zamrzlas' motions. The Zamrzlas' claims to production rights are deferred to a	
27	later hearing.	
28	3. Deadlines. Based on an October 25, 2022, hearing date on the Motions:	
	2220256.2 1351-007 STIPULATION REGARDING ZAMRZLAS' HEARING, DISCOVERY AND BRIEFING SCHEDULE; [PROPOSED] ORDER 6	

a,

Opposition briefs shall be filed and served by the Settling Parties and 1 a. 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 less. The Zamrzlas may file one reply to the Settling Parties' opposition of 20 pages or less. The 6 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 The Parties are permitted to conduct discovery as to any other party, per the a. Code of Civil Procedure and subject to the terms of this Stipulation. 11 12 b. Scope of Discovery. Discovery is limited to the scope of the issues to be addressed at the October 25, 2022 hearing, as described above in Section 2. 13 14 c. Discovery cutoff. Based on an October 25, 2022, hearing date on the Motions and Code of Civil Procedure, the discovery cutoff will be on Monday, September 26, 2022. 15 d. 16 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, California, unless otherwise agreed by the Parties. The depositions of the Zamrzlas will take place 18 19 between August 17-19, 2022, and will continue day to day until completed. 20 Written discovery. The Parties agree to shorten the time for written discovery e. 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 Extending discovery and merits briefing and hearing schedule. If any party g. 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 **Experts.** Electronic exchange of expert disclosures shall be made by 5:00 p.m. on 6. 2220256.2 1351-007

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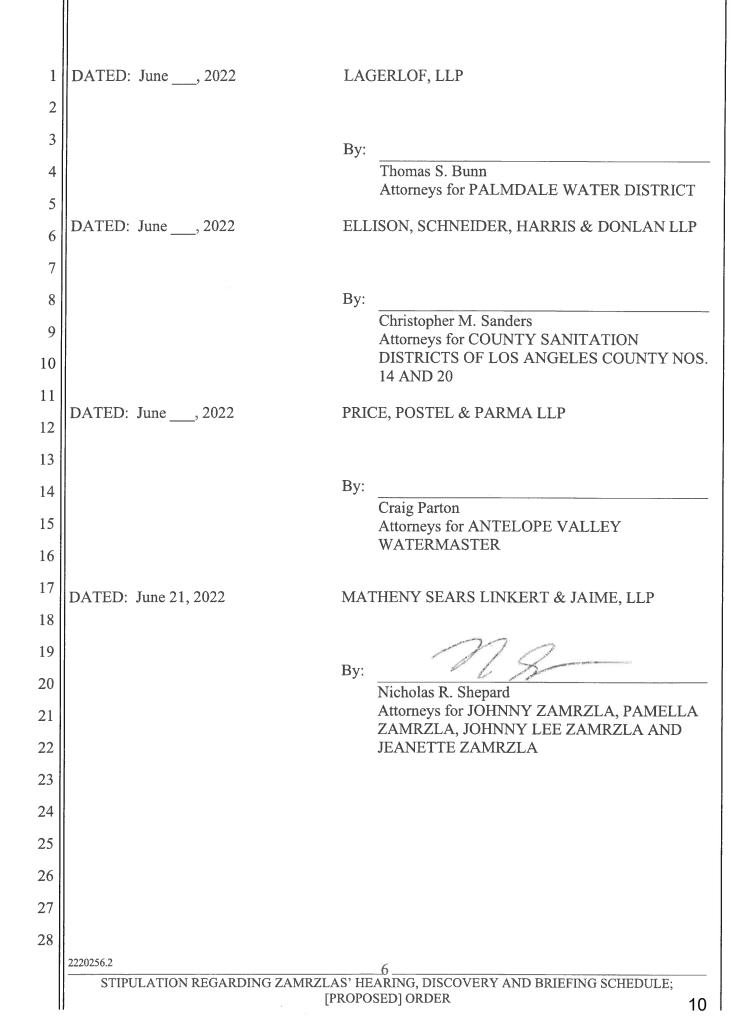
Friday, August 19, 2022. Electronic exchange of rebuttal experts shall be made by 5:00 p.m. on
Friday, September 9, 2022. Any expert testimony or document shall be limited to the issues set for the
October 25, 2022, hearing, as described in Section 2, above. Expert disclosures will be made
according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

KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD 12 DATED: June 22, 2022 A Professional Corporation 13 n. Ryan 14 By: 15 Eric N. Robinson 16 Jenifer N Ryan Attorneys for CITY OF LOS ANGELES and 17 LOS ANGELES WORLD AIRPORTS 18 DATED: June 22, 2022 LEBEAU THELEN LLP 19 n. Ryan 20 By: for 21 Robert G. Kuhs Attorneys for GRIMMWAY ENTERPRISES 22 23 DATED: June 22, 2022 LAGERLOF, LLP 24 25 By: for 26 Thomas S. Bunn 27 Attorneys for PALMDALE WATER DISTRICT 28 2220256.2 1351-007 STIPULATION REGARDING ZAMRZLAS' HEARING, DISCOVERY AND BRIEFING SCHEDULE: [PROPOSED] ORDER 8

1	DATED: June 22, 2022	ELLISON, SCHNEIDER, HARRIS & DONLAN LLP
2		Voin M. Kyran
3		By: for
4		Christopher M. Sanders
5		Attorneys for COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY NOS.
6		14 AND 20
7	DATED: June 22, 2022	PRICE, POSTEL & PARMA LLP
8		Jen M. Kyan
9		By:
10		Craig Parton Attorneys for ANTELOPE VALLEY
11		WATERMASTER
12		
13	DATED: June, 2022	MATHENY SEARS LINKERT & JAIME, LLP
14		
15		By:
16		Nicholas R. Shepard Attorneys for JOHNNY ZAMRZLA, PAMELLA
17		ZAMRŽLA, JOHNNY LEE ZAMRŽLA AND JEANETTE ZAMRZLA
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	STIPULATION REGARDING ZAMRZL	AS' HEARING, DISCOVERY AND BRIEFING SCHEDULE;
		PROPOSED] ORDER 9



1	[PROPOSED] ORDER	
2	The Court having read the foregoing Stipulation, and good cause appearing, IT IS	SO
3	ORDERED.	
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6	DATED: June <u>19</u> , 2022	
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	STIPULATION REGARDING ZAMRZLAS' HEARING, DISCOVERY AND BRIEFING SCHEDULE; [PROPOSED] ORDER	11

1	Judicial Council Coordination Proceeding No. 4408 For Filing Purposes Only: Santa Clara County Case No.: 1-05-CV-049053
2	PROOF OF SERVICE
3	STATE OF CALIFORNIA, COUNTY OF SACRAMENTO
4 5	At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Sacramento, State of California. My business address is 1331 Garden Hwy, 2nd Floor, Sacramento, CA 95833.
6	On June 22, 2022, I served true copies of the following document(s) described as
7 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 is true and correct.
11	Executed on June 22, 2022, at Sacramento, California.
12	Executed on sune 22, 2022, at Subramento, Camornia.
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14	skaning
15	Sherry Ramirez
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	STIPULATION REGARDING ZAMRZLAS' HEARING, DISCOVERY AND BRIEFING SCHEDULE;
	[PROPOSED] ORDER 12