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13
14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
15 **COUNTY OF LOS ANGELES**

16 Coordination Proceeding

17 ANTELOPE VALLEY GROUNDWATER
18 CASES,

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

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

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

24 Diamond Farming Co. v. City of Lancaster

25 Diamond Farming Co. v. Palmdale Water
District,

26 AND RELATED ACTIONS
27
28

Judicial Council Coordination
Proceeding No. 4408

LEAD CASE: LASC Case No. BC 325201

**SETTLING PARTIES AND
WATERMASTER'S JOINT WITNESS
AND EXHIBIT LIST**

Date: March 15, 2023
Time: 9:00 a.m.

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

Riverside County Superior Court
Case No. RIC 344436
Case No. RIC 344668
Case No. RIC 353840

Kern County Superior Court Case
No. S-1500-CV-254348

1 The City of Los Angeles (Los Angeles World Airports), Grimmway Enterprises, Palmdale
 2 Water District, County Sanitation Districts of Los Angeles County Nos. 14 and 20 (collectively,
 3 “Settling Parties”), and Antelope Valley Watermaster (“Watermaster”), respectfully submit the
 4 following joint list of witnesses and exhibits in support of their cases in chief.

5 **I. WITNESS LIST**

- 6 1. Jeffrey Dunn
- 7 2. Stefanie Hedlund
- 8 3. Matt Knudson
- 9 4. Rick Koch
- 10 5. Johnny Zamrzla
- 11 6. Pamela Zamrzla
- 12 7. Johnny Lee Zamrzla
- 13 8. Jeanette Zamrzla

14 **II. EXHIBIT LIST**

15 **A. Records Supporting December 23, 2015, Judgment**

Ex. No.	Date	Description
1	August 7, 2008	Declaration of Stefanie D. Hedlund re Status of Service of Process, Glo-Trans No. (“GTN”) 1750
2	September 12, 2008	Declaration of Jeffrey V. Dunn re Status of Service of Process, GTN 2011
3	December 16, 2008	Plaintiff Willis’ Revised Order Governing Class Notice, GTN 2314
4	February 18, 2009	Small pumper class action notice, GTN 2445
5	March 13, 2009	Order Approving Revised Class Notice for Small Pumper Class Action, GTN 2524
6	March 19, 2010	Declaration of Jeffrey V. Dunn re Status of Service of Process, GTN 3489
7	October 7, 2013	2013 small pumper class action notice of partial settlement, GTN 7188
8	October 25, 2013	Order Granting Preliminary Approval of Class Action Partial Settlement and Notice to the Class.

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Ex. No.	Date	Description
		GTN 7310
9	December 3, 2013	Declaration of Jennifer M. Keough regarding Notice Dissemination, GTN 7678
10	December 3, 2013	Supplemental Declaration of Michael D. McLachlan in Support of Motion for Final Approval of Partial Class Settlement, GTN 7679
11	January 5, 2014	Declaration of Michael D. McLachlan regarding Class Membership After Partial Settlement and Exhibit 4 attached thereto filed by Richard A. Wood, GTN 7858
12	March 4, 2015	2015 small pumper class action notice of settlement, GTN 9623 [Ex. 2]
13	April 6, 2015	Order Granting Preliminary Approval of Small Pumper Class Action Settlement and Notice to the Class, GTN 9752
14	June 3, 2015	Declaration of Jennifer M. Keough regarding Dissemination of Small Pumper Notice, GTN 9968
15	June 4, 2015	Declaration of Michael D. McLachlan re: Publication of Summary Class Notice of Settlement, GTN 9969
16	October 11, 2022	Declaration of Kevin Berg Regarding Dissemination of Small Pumper Class Action Notice, dated August 24, 2022 and filed with the Court on October 11, 2022 as GTN 12374

B. Post-Judgment Pleadings re Long Valley Road L.P.

Ex. No.	Date	Description
17	October 9, 2018	Long Valley Road L.P.'s Notice of Motion and Motion for Leave to Intervene in Judgment; Memorandum of Points and Authorities in Support, dated and filed with the Court on October 9, 2018 as GTN 11811
18	October 9, 2018	Declaration of Bruce E. Pherson Jr. in Support of Long Valley Road L.P.'s Motion to Intervene in Judgment, dated October 8, 2018 and filed with the Court on October 9, 2018 as GTN 11808
19	October 9, 2018	Declaration of Andrew W. Homer in Support of Long Valley Road L.P.'s Motion to Intervene in Judgment, dated and filed with the Court on October 9, 2018 as GTN 11810
20	October 9, 2018	Proposed Order Re: Long Valley Road L.P.'s Motion for Leave to Intervene in Judgment, filed with the Court on October 9, 2018 as GTN 11809
21	October 18, 2018	Joint Opposition to Motion of Long Valley Road, L.P. for Leave to Intervene in Judgment; Objections to the Declarations of Andrew W. Homer and Bruce E. Pherson, Jr., Filed in Support of the Motion; and Objection to the Proposed Order on the Motion, dated and filed with the Court on October 18, 2018 as GTN 11813
22	October 19, 2018	Watermaster's Opposition to Long Valley Road, L.P.'s Motion for Leave to Intervene in Judgment; Declarations of Craig A. Parton, Michael D. McLachlan, and Jeffrey V. Dunn in Support Thereof, dated and filed with the Court on October 19, 2018 as GTN 11814
23	October 19, 2018	Notice of Errata to Watermaster's Opposition to Long Valley Road, L.P.'s Motion for Leave to Intervene in Judgment; Declarations of Craig A. Parton, Michael D. McLachlan, and Jeffrey V. Dunn in Support Thereof, dated and filed with the Court on October 19, 2018 as GTN 11819
24	October 19, 2018	Watermaster's Request for Judicial Notice in Support of its Opposition to Long Valley Road, L.P.'s Motion for Leave to Intervene in Judgment; Exhibits 1-5, dated and filed with the Court on October 19, 2018 as GTN 11815
25	October 19, 2018	[Proposed] Order Denying Long Valley Road, L.P.'s Motion for Leave to Intervene in Judgment, filed with the Court on October 19, 2018 as GTN 11816
26	October 19, 2018	Public Water Supplier Opposition to Long Valley Road, L.P.'s Motion for Leave to Intervene in Judgment, dated and filed with the Court on October 19, 2018 as GTN

Ex. No.	Date	Description
		11817
27	October 25, 2018	Long Valley Road, L.P.'s Reply in Support of Motion to Intervene in Judgment, dated and filed with the Court on October 25, 2018 as GTN 11825
28	November 9, 2018	Order Denying Long Valley Road, L.P.'s Motion to Intervene in Judgment, dated November 1, 2018 and filed with the Court on November 9, 2018 as GTN 11833

C. Communications and Pleadings re Zamrzlas

Ex. No.	Date	Description
29	January 22, 2019	January 22, 2019 invoice from the Watermaster to Johnny Zamrzla for 2018 RWAs imposed by the Antelope Valley Watermaster, and attached as Exhibit E to Watermaster's Motion for Monetary and Injunctive Relief as GTN 12093
30	March 18, 2019	Pumping data dated March 18, 2019, relating to groundwater pumped by the Zamrzlas in 2018, submitted by the Zamrzla Parties to the Watermaster, and attached as Exhibit A to Watermaster's Motion for Monetary and Injunctive Relief as GTN 12093
31	April 24, 2019	Resolution 19-27 of the Antelope Valley Watermaster, and attached as Exhibit D to Watermaster's Motion for Monetary and Injunctive Relief as GTN 12093
32	August 28, 2019	Attorney billing ledger for Price, Postel & Parma LLP, and attached as Exhibit C to Watermaster's Motion for Monetary and Injunctive Relief as GTN 12093
33	September 5, 2019	Memorandum dated September 5, 2019 from Todd Groundwater to Craig Parton "Re: Groundwater Production on Zamrzla Parcels," and attached as Exhibit B to Watermaster's Motion for Monetary and Injunctive Relief as GTN 12093
34	December 3, 2021	Declaration of Jeffrey V. Dunn in support of Watermaster's Reply to Zamrzla's Opposition to Motion for Declaratory and Injunctive Relief, filed with this Court as an attachment to the Watermaster's Reply brief, GTN 12153

1 **D. Evidence Post-Zamrzlas' Motions to Set Aside or Modify Judgment**

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3	Ex. No.	Date	Description
4	35	February 8, 1961	1961 Parcel Map (028) – Pamela Zamrzla deposition markings
5	36	February 8, 1961	1961 Parcel Map (028) – Johnny Lee Zamrzla deposition markings
6	37	October 2, 1970	1970 Grant Deed, Parcel 026 (Z000001)
7	38	October 6, 1986	1986 Grant Deed, Parcels 002 and 003 (Z000002)
8	39	May 25, 1999	1999 Grant Deed, Parcel 026 (Z000005)
9	40	May 25, 1999	1999 Grant Deed, Parcels 002 and 003 (Z000003)
10	41	May 25, 1999	1999 Grant Deed, Parcel 028 (Z000004)
11	42	January 14, 2002	Aerial photo of Zamrzla and Van Dam properties
12	43	2006	2006 Parcel Map – Johnny Zamrzla deposition markings
13	44	2006	2006 Parcel Map – Pamela Zamrzla deposition markings
14	45	February 7, 2006	Aerial photo of Zamrzla and Van Dam properties
15	46	August 10, 2007	2007 Grant Deed (Z001262-64)
16	47	November 16, 2007	2007 lease signed between Grimmway and Johnny Zamrzla
17	48	Approx. April 2008	Google Earth image of Zamrzlas' properties
18	49	Approx. July 2008	Google Earth image of Zamrzlas' properties
19	50	Approx June 2009	Google Earth image of Zamrzlas' properties
20	51	February 19, 2014	2014 Grant Deed, Parcel 027 (JLZ000001-4)
21	52	Approx. September 2018	Google Earth image of Zamrzla properties
22	53	November 12, 2021	Declaration of Johnny Zamrzla re Opposition by the Zamrzla's to the Watermaster's Motion for Monetary, Declaratory and Injunctive Relief Against Zamrzla's and exhibits attached thereto, GTN 12133
23	54	May 26, 2022	Johnny Zamrzla's Responses to Settling Parties' Demand for Production of Documents, Set One

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Ex. No.	Date	Description
55	June 3, 2022	Johnny Zamrzla deposition transcript excerpts
56	August 17, 2022, and August 18, 2022	Pamella Zamrzla deposition transcript excerpts
57	August 17, 2022	Johnny Lee Zamrzla deposition transcript excerpts
58	August 18, 2022	Jeanette Zamrzla deposition transcript excerpts
59	August 22, 2022	Zamrzla Response to Settling Parties' Requests for Production

DATED: February 22, 2023

KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD
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By: 

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DATED: February 22, 2023

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DATED: February 22, 2023

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By: 

Thomas S. Bunn
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1 DATED: February 22, 2023

ELLISON, SCHNEIDER, HARRIS & DONLAN LLP

2

3

By:  for

4

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

5

6

7 DATED: February 22, 2023

PRICE, POSTEL & PARMA LLP

8

By:  for

9

Craig Parton
Attorneys for ANTELOPE VALLEY
WATERMASTER

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF SACRAMENTO

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.

On February 22, 2023, I served true copies of the following document(s) described as **SETTLING PARTIES AND WATERMASTER'S JOINT WITNESS AND EXHIBIT LIST** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

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

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

Executed on February 22, 2023, at Sacramento, California.

Sherry Ramirez