

1 James W. Lewis (SBN 207599)
TAYLOR & RING
2 10900 Wilshire Boulevard, Suite 920
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3 Telephone: (310) 209-4100
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4

Attorneys for Cross-defendants,
5 LITTLE ROCK SAND AND GRAVEL, INC.,
a California Corporation;
6 THE GEORGE AND CHARLENE LANE FAMILY TRUST;
THE FRANK AND YVONNE LANE 1993 FAMILY
7 TRUST, DATED MARCH 5, 1993, AS RESTATED
JULY 20, 2000; MONTE VISTA BUILDING SITES, INC.,
8 a California Corporation; A.V. MATERIALS, INC.,
a California Corporation; A.C. WARNACK,
9 as Trustee of the A.C. WARNACK TRUST;
HOLLIDAY ROCK CO., INC.,
10 successor in interest to
LITTLEROCK AGGREGATE CO., INC. dba
11 ANTELOPE VALLEY AGGREGATE, INC.;
LITTLEROCK AGGREGATE CO., INC. dba
12 ANTELOPE VALLEY AGGREGATE, INC.

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

16 ANTELOPE VALLEY GROUNDWATER CASES)	Judicial Council Coordination No.
17 Included Actions:)	4408
18 Los Angeles County Waterworks)	For filing purposes only:
19 District No. 40 v. Diamond)	Santa Clara County Case No.
Farming Co. Superior Court of)	1-05-CV-049053
20 California County of Los Angeles,)	[Assigned to the Honorable Jack
Case No. BC 325 201)	Komar]
21 Los Angeles County Waterworks 2)	STIPULATION OF FACTS FOR TRIAL
22 District No. 40 v. Diamong)	PURSUANT TO CASE MANAGEMENT
Farming Co. Superior court of)	ORDER FOR PHASE IV TRIAL
23 Califronia, County of Kern, Case)	
24 No. S-1500-CV-254-348)	

1 Wm. Bolthouse Farms, Inc. V. City)
of Lancaster Diamong Farming Co.)
2 V. City of Lancaster Diamond)
Farming Co. V. Palmdale Water)
3 Dist. Superior Court of)
California, County of Riverside,)
4 consolidated actions, Case No.)
RIC 353 840, RIC 344 436, RIC 344)
5 668)

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7
8 **STIPULATION**

9 IT IS HEREBY STIPULATED by and through the parties to this stipulation, through
10 their counsel of record, that the facts set forth in the following declarations are true and require
11 no proof at the Phase IV trial in this matter:

- 12 1. Declaration of George M. Lane in Lieu of Deposition Testimony for Phase 4 Trial,
dated January 31, 2013, as corrected by the Notice of Errata on February 5, 2013;
- 13 2. Declaration of Blake McCullough-Sanden Re Phase 4 Trial dated January 31, 2013;
- 14 3. Declaration of Robert J. Pluss in Lieu of Deposition Testimony for Phase 4 Trial dated
15 January 31, 2013;
- 16 4. Declaration of Dean Browning in Lieu of Deposition Testimony for Phase 4 Trial
dated January 31, 2013;
- 17 5. Declaration of John Holliday in Lieu of Deposition Testimony for Phase 4 Trial dated
18 January 31, 2013;

19 ///
20 ///
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22 ///
23 ///

1 6. Declaration of Peter H. Pouwels in Lieu of Deposition Testimony for Phase 4 Trial
2 dated January 31, 2013.

3
4 IT IS SO STIPULATED:

5 Dated: ~~February~~ ^{April 25} ____, 2013

TAYLOR & RING

6
7 By: 

8 James W. Lewis
9 Attorneys for Cross-
10 Defendants HOLLIDAY ROCK
11 CO., INC., successor in
12 interest to LITTLE ROCK
13 AGGREGATE CO., INC. dba
14 ANTELOPE VALLEY
15 AGGREGATE, INC.; THE
16 FRANK AND YVONNE LANE
17 1993 FAMILY TRUST, DATED
18 MARCH 5, 1993, AS
19 RESTATED JULY 20, 2000,
20 successor in interest to
21 FRANK A. LANE, ROE 612;
22 THE GEORGE AND CHARLENE
23 LANE FAMILY TRUST,
24 Successor in interest to
George M. Lane, Roe 316;
MONTE VISTA BUILDING
SITES, INC., a
California Corporation;
A.V. MATERIALS, INC., a
California Corporation,
ROE 9; A.C. WARNACK,
as Trustee of the A.C.
WARNACK TRUST; LITTLE
ROCK SAND AND GRAVEL,
INC.

1 Dated: ~~February~~ ^{May} 21, 2013

BEST BEST & KRIEGER LLP

By: Jeffrey V. Dunn
Eric Garner
Jeffrey V. Dunn
Stefanie D. Hedlund
Attorneys for Cross-
Complainant, Los Angeles
County Waterworks
District No. 40

8 Dated: ~~February~~ ^{May} 23, 2013

RICHARDS, WATSON & GERSHON

By: James L. Markman
Steven Orr
James L. Markman
Attorneys for Cross-
Defendant, City of
Palmdale

14 Dated: February __, 2013

CHARLTON WEEKS LLP

By: _____
Bradley T. Weeks
Attorneys for Defendant
and Cross-Complainant,
Quartz Hill Water
District

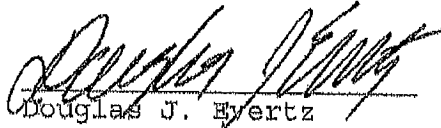
1 Dated: February ^{NA7} 17, 2013

MURPHY & EVERTZ

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3

By:


Douglas J. Evertz
Attorneys for Cross-
Defendant, City of
Lancaster and Rosamond
Community Services
District

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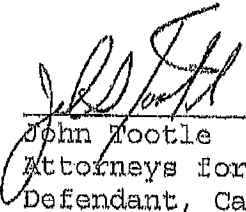
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7 Dated: February  ___, 2013

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9

By:


John Fottle
Attorneys for Cross-
Defendant, California
Water Service Company

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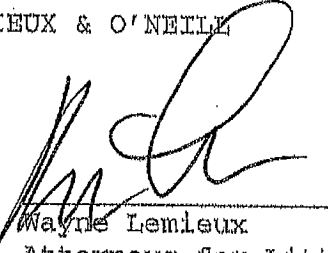
13 Dated: February 23, 2013

LEMIEUX & O'NEILL

14

15

By:


Wayne Lemieux
Attorneys for Little Rock
Creek Irrigation
District, Palm Ranch
Irrigation District, et
al.

16

17

18


19 Dated: February ^{April 25} ___, 2013

LAGERLOF SENECAI GOSNEY &
KRUSE

20

21

By:


Thomas Bunn III
Attorneys for Cross-
Defendant, Palmdale
Water District


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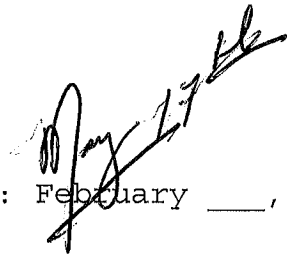
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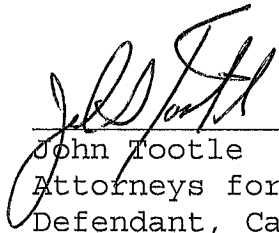
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1 Dated: ^{NA7} February 17, 2013

MURPHY & EVERTZ

2
3
4 By: 
Douglas J. Evertz
Attorneys for Cross-
5 Defendant, City of
Lancaster and Rosamond
6 Community Services
District

7 Dated: February , 2013

8
9
10 By: 
John Tootle
Attorneys for Cross-
11 Defendant, California
Water Service Company


12 Dated: February ___, 2013

LEMIEUX & O'NEILL

13
14
15 By: _____
Wayne Lemieux
Attorneys for Littlerock
16 Creek Irrigation
District, Palm Ranch
17 Irrigation District, et
18 al.

19 Dated: ^{April 25} February ___, 2013

LAGERLOF SENEAL GOSNEY &
KRUSE

20
21
22 By: 
Thomas Bunn III
Attorneys for Cross-
23 Defendant, Palmdale
Water District

PROOF OF SERVICE
(C.C.P. 1013A, 2015.5)

STATE OF CALIFORNIA

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen years and not a party to the within action; my business address is 10900 Wilshire Boulevard, Suite 920, Los Angeles, California 90024.

On May 16, 2013, I served the foregoing document, described as:

STIPULATION OF FACTS FOR TRIAL PURSUANT TO CASE MANAGEMENT ORDER FOR PHASE IV TRIAL

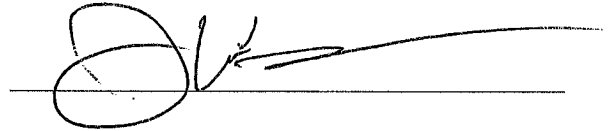
on the interested parties in this action in the following manner:

 X **BY ELECTRONIC SERVICE AS FOLLOWS** by posting the document(s) listed above to the Santa Clara website in the action of the *Antelope Valley Groundwater Litigation*, Judicial Council Coordination Proceeding No. 4408, Santa Clara Case No. 1-05-CV-049053.

Executed on May 16, 2013 at Los Angeles, California.

 XX **(State)** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

James W. Lewis



PROOF OF SERVICE
(C.C.P. 1013A, 2015.5)

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