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• 1800 30th Street, Fourth Floor

SCOTT K. KUNEY, Esq., SBN 111115 ERNEST A. CONANT, Esq., SBN 089111 THE LAW OFFICES OF YOUNG WOOLDRIDGE, LLP 1800 30th Street, Fourth Floor Bakersfield, CA 93301 Telephone: (661) 327-9661 Facsimile: (661) 327-0720

Attorneys for Craig Van Dam

SUPERIOR COURT OF THE STATE OF CALIFORNIA **COUNTY OF LOS ANGELES**

Coordination Proceeding Special Title (Rule 1550(b))

ANTELOPE VALLEY **GROUNDWATER CASES**

Included Actions:

Los Angeles County Waterworks District No. 40 v. Diamond FARMING/IRRIGATION Co. Superior Court of California County of Los Angeles, Case No. BC 325201

Los Angeles County Waterworks District No. 40 v. Diamond FARMING/IRRIGATION Co. Superior Court of California, County of Kern, Case No. S-1500-CV 254348

Wm. Bolthouse Farms, Inc. v. City of Lancaster Diamond FARMING/IRRIGATION Co. v. City of Lancaster Diamond FARMING/IRRIGATION Co. v. Palmdale Water Dist. Superior Court of California, County of Riverside, consolidated actions, Case Nos. RIC 353840, RIC 344436, RIC 344668

Judicial Council Coordination Proceeding No. 4408

SC Case No. 105CV 049053 Assigned to Hon. Jack Komar

STIPULATION WITH CRAIG VAN DAM FOR PHASE 4 TRIAL

ALIMITED LIABELITY PARTHERSHIE INCLUDING PROFESSIONAL CORPORATIONS
Westchester Corporate Plaza • 1800 30th Street, Fourth Floor • Bakersfield, CA 93301-5298 • Telephoae 661-327-9661 • Facsimile 661-327-0720 • http://www.youngwooldridge.com Wooldridge, LLP

The Law Offices Of

STIPULATION

Los Angeles Waterworks District No. 40, City of Palmdale, City of Lancaster,
Littlerock Creek Irrigation District, Palm Ranch Irrigation District, Palmdale Water District,
Quartz Hill Water District, Rosamond Community Services District, and California Water
Service Company (collectively, the "Public Water Suppliers") hereby enter into the following
stipulation with Craig Van Dam.

This Stipulation is entered pursuant to the Fifth Amended Case Management Order for Phase 4 Trial. This Stipulation is only for the purpose of determining groundwater pumping during 2011 and 2012. This stipulation shall not result in any determination of any water right, or the reasonableness of any party's water use or manner of applying water to the use. This Stipulation will not preclude any party from introducing in a later trial phase evidence to support its claimed water rights including, without limitation, evidence of water use in year other than 2011 and 2012. All parties reserve their rights to produce any evidence to support their claimed water rights and make any related legal arguments including, without limitation arguments based on any applicable constitutional, statutory, or decisional authority.

The parties hereto hereby stipulate that groundwater pumped by Craig Van Dam was 55 acre-feet in 2011 and 57 acre-feet in 2012.

Dated: May 24, 2013

BEST BEST & KRIEGER LLP

JEFFREY V. DUNN

STEFANIE D. HEDLUND

Attorneys for Cross-Complainant

LOS ANGELES COUNTY

WATERWORKS DISTRICT NO. 40

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ALIMITED LIABILITY PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
WESTChester Corporate Plaza • 1800 30⁴⁶ Street, Fourth Floor • Bakersfield, CA 93301-5298 • Telephone 661-327-9661 • Facsimile 661-327-0720 • http://www.youngwooldridge.com 1 Dated: May 23, 2013 2 JAMES L. MARKMAN 3 STEVEN ORR Attorneys for Cross-Defendant CITY OF PALMDALE 5 6 7 Dated: May , 2013 By 8 DOUGLAS J. EVERTZ 9 Attorneys for Cross-Defendant CITY OF LANCASTER AND ROSAMOND 10 COMMUNITY SERVICES DISTRICT 11 12 13 Dated: May ____, 2013 14 By WAYNE LEMIEUX 15 16 17 18 19 20 Dated: May , 2013 By 21 THOMAS BUNN III 22 23 24 25 Dated: May ____, 2013 Ву 26 27 28

Attorneys for Cross-Defendant LITTLEROCK CREEK IRRIGATION DISTRICT AND PALM RANCH IRRIGATION DISTRICT Attorneys for Cross-Defendant PALMDALE WATER DISTRICT BRADLEY T. WEEKS Attorneys for Cross-Defendant QUARTZ HILL WATER DISTRICT

STIPULATION WITH CRAIG VAN DAM FOR PHASE 4 TRIAL

ed Llability Partnership incliding propessional corporations Baketsfield, CA 93301-5298 (= Telephole 661-327-966f = Facsimile 661-327-0720 = http://www.youngwooldridge.com Dated: May , 2013 2 JAMES L. MARKMAN 3 STEVEN ORR Attorneys for Cross-Defendant CITY OF PALMDALE Dated: May 7, 2013 8 Attorneys for Cross-Defendant CITY OF LANCASTER AND ROSAMOND COMMUNITY SERVICES DISTRICT 12 13 Dated: May ____, 2013 Attorneys for Cross-Defendant LITTLEROCK CREEK IRRIGATION DISTRICT AND PALM RANCH IRRIGATION DISTRICT 19 20 Dated: May 242013 21 THOMAS BUNN III Attorneys for Cross-Defendant PALMDALE WATER DISTRICT 23 24 25 Dated: May , 2013 BRADLEY T. WEEKS Attorneys for Cross-Defendant QUARTZ HILL WATER DISTRICT

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Dated: May, 2013	JAMES L. MARKMAN
	STEVEN ORR
	Attorneys for Cross-Defendant CITY OF PALMDALE
	CILY OF PALMIDALE
Dated: May, 2013	Ву
P metro-rando	DOUGLAS J. EVERTZ
	Attorneys for Cross-Defendant CITY OF LANCASTER AND ROSAMONI COMMUNITY SERVICES DISTRICT
	COMMONITY SERVICES DISTRICT
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Dated: May 21, 2013	By MM
Dato. 17(a)	WAYNE LEMIEUX
	Attorneys for Cross-Defendant LITTLEROCK CREEK IRRIGATION
	DISTRICT AND PALM RANCH IRRIGATION DISTRICT
Dated: May, 2013	Ву
Dated: 191ay 201J	THOMAS BUNN III
	Attorneys for Cross-Defendant PALMDALE WATER DISTRICT
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STIPULATION	WITH CRAIG VAN DAM FOR PHASE 4 TRIAL

Young Wooldridge, LLP

Facsimile 661-327-0720 • http://www.youngwookdridge.com Dated: May , 2013 2 JAMES L. MARKMAN 3 STEVEN ORR Attorneys for Cross-Defendant CITY OF PALMDALE Dated: May DOUGLAS J. EVERTZ Attorneys for Cross-Defendant CITY OF LANCASTER AND ROSAMOND COMMUNITY SERVICES DISTRICT 13 Dated: May _____, 2013 WAYNE LEMIEUX Attorneys for Cross-Defendant LITTLEROCK CREEK IRRIGATION DISTRICT AND PALM RANCH IRRIGATION DISTRICT 18 Westchester Corporate Plaza . 1800 30th Street, Fourth Floor . 19 20 Dated: May 272013 21 THOMAS BUNN III Attorneys for Cross-Defendant 22 PALMDALE WATER DISTRICT 23 24 25 Dated: May 2013 26 BRADLEY T. WEEKS Attorneys for Cross-Defendant 27 QUARTZ HILL WATER DISTRICT 28

STIPULATION WITH CRAIG VAN DAM FOR PHASE 4 TRIAL

Young Wooldridge, LLP

Facilitie 661-327-0720 * http://www.youngwooldridge.com Dated: May ____, 2013 2 JAMES L. MARKMAN STEVEN ORR Attorneys for Cross-Defendant CITY OF PALMIDALE 5 7 Dated: May ... 2013 8 DOUGLAS J. EVERTZ Attorneys for Cross-Defendant CITY OF LANCASTER AND ROSAMOND Telephone 661-327-9661 COMMUNITY SERVICES DISTRICT 12 13 Dated: May ____, 2013 14 * 1800 30th Street, Fourth Floor * Bakersfield, CA 93301-5298 WAYNE LEMIEUX 15 Attorneys for Cross-Defendant LITTLEROCK CREEK IRRIGATION DISTRICT AND PALM RANCH IRRIGATION DISTRICT 20 Dated: May , 2013 By THOMAS BUNN III 21 Attorneys for Cross-Defendant 22 PALMDALE WATER DISTRICT 23 Westuliester Corporate Plaza 24 25 Dated: May 22, 2013 26 BRADLEY T. WEEKS Attorneys for Cross-Defendant 27 **QUARTZ HILL WATER DISTRICT** 28

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Dated: May ____, 2013

3.

Attorneys for Cross-Defendant CALFORNIA WATER SERVICE COMPANY

Dated: May 21, 2013

THE LAW OFFICES OF YOUNG WOOLDRIDGE, LLP

Attorneys for CRAIG VAN DAM

Dated: May ____, 2013

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By____

JOHN TOOTLE

Attorneys for Cross-Defendant CALIFORNIA WATER SERVICE

COMPANY

Dated: May 21, 2013

THE LAW OFFICES OF YOUNG WOOLDRIDGE, LLP

By

SCOTT K. KUNÉY

Attorneys for CRAIG VAN DAM

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF KERN

I, ERIN L. LINDSEY, declare: I am and was at the times of the service hereunder mentioned, over the age of eighteen (18) years, and not a party to the within cause. My business address is 1800 30th Street, Fourth Floor, Bakersfield, CA 93301.

On May <u>93</u>, 2013, I caused the below listed document(s) entitled as: **STIPULATION WITH CRAIG VAN DAM FOR PHASE 4 TRIAL**, to be served on the parties via the following service:

<u>X</u> (BY POSTING) I posted the document listed above to the Santa Clara Superior Court website regarding the Antelope Valley Groundwater matter pursuant to the Court's Clarification Order. Electronic service posting completed through www.scefiling.org.

 \underline{X} (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on May 23, 2013, at Bakersfield, California.

ERIN L. LINDSEY