1

2

3

4

5

6

7

8

10

11

12

13

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1800 30th Street, Fourth

Westchester Corporate Plaza

The Law Offices Of

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 Delmar D. Van Dam, Gertrude J. Van Dam, and Gary 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 DELMAR D. VAN DAM, GERTRUDE J. VAN DAM, AND GARY VAN DAM FOR PHASE 4 TRIAL

oung Wooldridge, LLP

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

Westchester Corporate Plaza • 1800 30th Street, Fourth Floor • Bakersfield, CA 93301-5298 • Telephone 661-327-9661 • Facsimile 661-327-0720 • http://www.youngwooldridge.com A LIMITED LIABILITY PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

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 Delmar D. Van Dam, Gertrude J. Van Dam, and Gary Van Dam (collectively, "VAN DAMS".)

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 VAN DAMS was 9,840 acre-feet in 2011 and 10,023 acre-feet in 2012.

Dated: May 21, 2013

BEST BEST & KRIEGER LLP

Attorneys for Cross-Complainant

LOS ANGELES COUNTY

WATERWORKS DISTRICT NO. 40

The Law Offices Of

Young Wooldridge,

රි 26.	26. 27	25	© 0081 23 • 24	h	Fourt	19 5 20 19	# 18	kersie 17	16 5 16	25-1056 3301-52	14 8	ਜ਼ਿਲ੍ਹ ਜ਼ਿਲ੍ਹ 13	12 12 12	22-366-11 11 52-366-1	SKOLL 10	csimile 661-327-0	97.	http://w	mox-xxx 4	ngwooldr.
orpora	corporate Corpor	Δ.,	· § 24	8 22	13S #10E 00	20 30 th Street,	20 30 th Street,	20 30 th Street, Fourth Floor	10 30th Street, Fourth Floor - Bakersfield, CA 93301-5298 • Telepho 10 30th 12 12 12 12 12 12 12 12 12 12 12 12 12	10 30th Street, Fourth Floor - Bakersfield, CA 93301-5298 • Telepho 10 30th 12 12 12 12 12 12 12 12 12 12 12 12 12	10 30th Street, Fourth Floor • Bakersfield, CA 93301-5239 • Telephone 661-327-9661 • 10 20 20 20 20 20 20 20 20 20 20 20 20 20	10 30th Street, Fourth Floor • Bakersfield, CA 93301-5239 • Telephone 661-327-9661 • 10 20 20 20 20 20 20 20 20 20 20 20 20 20	10 30th Street, Fourth Floor • Bakersfield, CA 93301-5239 • Telephone 661-327-9661 • 10 20 20 20 20 20 20 20 20 20 20 20 20 20	00.30th Street, Fourth Floor • Bakersfield, CA 93301-5298 • Telephone 661-327-9661 • Facsimile 661-327-0720 • http://doi.org/10.1001/1	103.00 Street, Fourth Floor • Bakersfield, CA 9301-521.					
0 76	ථ 26 .	불 25		23	13S n 0 0 0 0 2 2 3 • 2 4	21 22 22 23 24 24	21 22 22 23 24 24	1800 30th Street, Fourth Floor 20 20 21 22 23	a • 1800 30 th Street, Fourth Floor • Bakersfield, CA 93301-5298 • Telepho Roper a • 1800 30 th Street, Fourth Floor • Bakersfield, CA 93301-5298 • Telepho a • 1800 30 th Street, Fourth Floor • Bakersfield, CA 93301-5298	a • 1800 30 th Street, Fourth Floor • Bakersfield, CA 93301-5298 • Telepho Roper a • 1800 30 th Street, Fourth Floor • Bakersfield, CA 93301-5298 • Telepho a • 1800 30 th Street, Fourth Floor • Bakersfield, CA 93301-5298	a • 1800 30 th Street, Fourth Floor • Bakersfield, CA 93301-5298 • Telephone 661-327-9661 • a 1800 30 th Street, Fourth Floor • Bakersfield, CA 93301-5298 • Telephone 661-327-9661 • a 20 21 22 23 24 25 25 25 25 25 25 25 25 25 25 25 25 25	a • 1800 30 th Street, Fourth Floor • Bakersfield, CA 93301-5298 • Telephone 661-327-9661 • a 1800 30 th Street, Fourth Floor • Bakersfield, CA 93301-5298 • Telephone 661-327-9661 • a 20 21 22 23 24 25 25 25 25 25 25 25 25 25 25 25 25 25	a • 1800 30 th Street, Fourth Floor • Bakersfield, CA 93301-5298 • Telephone 661-327-9661 • a 1800 30 th Street, Fourth Floor • Bakersfield, CA 93301-5298 • Telephone 661-327-9661 • a 20 21 22 23 24 25 25 25 25 25 25 25 25 25 25 25 25 25	a • 1800 30th Street, Fourth Floor • Bakersfield, CA 93301-5298 • Telephone 661-327-9661 • Facsimile 661-327-0720 • http://doi.org/10.0001/10.	a • 1800 30th Street, Fourth Floor • Bakersfield, CA 93301-5298 • Telephone 661-327-9661 • Facsimile 661-327-0720 • http://doi.org/10.0001/10.					
-	ster	0 76	ਕੂ 35 25	0081 23 • 24	22 23 • Blaza 24 25	21 22	21 22	re Plaza • 1800 30th Street, Fourth Floor 50 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	re Plaza • 1800 30th Street, Fourth Floor 50 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	re Plaza • 1800 30th Street, Fourth Floor 50 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	re Plaza • 1800 30th Street, Fourth Floor 50 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	re Plaza • 1800 30th Street, Fourth Floor 50 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	re Plaza • 1800 30th Street, Fourth Floor 50 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	re Plaza • 1800 30 th Street, Fourth Floor • Bakersfield, CA 93301-5298 • Telepho PROPE 12	re Plaza • 1800 30 th Street, Fourth Floor • Bakersfield, CA 93301-5298 • Telepho PROPE 12	re Plaza • 1800 30 th Street, Fourth Floor • Bakersfield, CA 93301-5298 • Telephone (661-327-9661 • 1800 30 th Street, Fourth Floor • Bakersfield, CA 93301-5298 • Telephone (661-327-9661 • 1800 30 th Street, Fourth Floor • Bakersfield, CA 93301-5298 • Telephone (661-327-9661 • 1800 30 th Street, Fourth Floor • Bakersfield, CA 93301-5298 • Telephone (661-327-9661 • 1800 30 th Street, Fourth Floor • 1800 30 th Street, Floor • 18	re Plaza • 1800 30 th Street, Fourth Floor • Bakersfield, CA 93301-5298 • Telephone (661-327-9661 • 1800 30 th Street, Fourth Floor • Bakersfield, CA 93301-5298 • Telephone (661-327-9661 • 1800 30 th Street, Fourth Floor • Bakersfield, CA 93301-5298 • Telephone (661-327-9661 • 1800 30 th Street, Fourth Floor • Bakersfield, CA 93301-5298 • Telephone (661-327-9661 • 1800 30 th Street, Fourth Floor • 1800 30 th Street, Floor • 18	re Plaza • 1800 30 th Street, Fourth Floor • Bakersfield, CA 93301-5298 • Telephone (661-327-9661 • 1800 30 th Street, Fourth Floor • Bakersfield, CA 93301-5298 • Telephone (661-327-9661 • 1800 30 th Street, Fourth Floor • Bakersfield, CA 93301-5298 • Telephone (661-327-9661 • 1800 30 th Street, Fourth Floor • Bakersfield, CA 93301-5298 • Telephone (661-327-9661 • 1800 30 th Street, Fourth Floor • 1800 30 th Street, Floor • 18	re Plaza • 1800 30 th Street, Fourth Floor • Bakersfield, CA 93301-5298 • Telephone 661-327-9661 • Facsimile 661-327-0720 • http://doi.org/10.100/10	re Plaza • 1800 30 th Street, Fourth Floor • Bakersfield, CA 93301-5298 • Telephone 661-327-9661 • Facsimile 661-327-0720 • http://doi.org/10.100/10

Dated: May 23, 2013 JAMES L. MARKMAN STEVEN ORR Attorneys for Cross-Defendant CITY OF PALMDALE Dated: May ____, 2013 DOUGLAS J. EVERTZ Attorneys for Cross-Defendant CITY OF LANCASTER AND ROSAMOND COMMUNITY SERVICES DISTRICT Dated: May ____, 2013 WAYNE LEMIEUX Attorneys for Cross-Defendant LITTLEROCK CREEK IRRIGATION DISTRICT AND PALM RANCH IRRIGATION DISTRICT Dated: May , 2013 THOMAS BUNN III Attorneys for Cross-Defendant PALMDALE WATER DISTRICT 26 Dated: May ____, 2013 By 27 BRADLEY T. WEEKS 28 Attorneys for Cross-Defendant QUARTZ HILL WATER DISTRICT

> STIPULATION WITH DELMAR D. VAN DAM, GERTRUDE J. VAN DAM, AND GARY VAN DAM FOR PHASE 4 TRIAL



Facsimile 661-327-0720 . http://www.youngwooldridge.com 2 Dated: May ____, 2013 3 JAMES L. MARKMAN 4 STEVEN ORR Attorneys for Cross-Defendant 5 CITY OF PALMDALE 8 Dated: May 2, 2013 10 Attorneys for Cross-Defendant ED LIABILITY PARTNERSHIP INCLUDING PROCESSIONAL CORPORAT Bakersfield, CA 93301-5298 • Telephone 661-327-9661 CITY OF LANCASTER AND ROSAMOND COMMUNITY SERVICES DISTRICT Dated: May ____, 2013 WAYNE LEMIEUX Attorneys for Cross-Defendant The Law Offices Of LITTLEROCK CREEK IRRIGATION DISTRICT AND PALM RANCH IRRIGATION DISTRICT 19 20 21 1800 30th Street, Dated: May 2 2013 22 THOMAS BUNN III Attorneys for Cross-Defendant 23 PALMDALE WATER DISTRICT Westchester Corporate Plaza 24 25 26 Dated: May ____, 2013 27 BRADLEY T. WEEKS 28 Attorneys for Cross-Defendant QUARTZ HILL WATER DISTRICT

> STIPULATION WITH DELMAR D. VAN DAM, GERTRUDE J. VAN DAM, AND GARY VAN DAM FOR PHASE 4 TRIAL

· http://www.youngwooldridge.eam

Facsimile 661-327-0720 8

9

10

11

12 13

14

15

16

17

18 19

20 21

22

23

2

3

Dated: May ____, 2013 JAMES L. MARKMAN STEVEN ORR Attorneys for Cross-Defendant CITY OF PALMDALE Dated: May ____, 2013 DOUGLAS J. EVERTZ Attorneys for Cross-Defendant CITY OF LANCASTER AND ROSAMOND COMMUNITY SERVICES DISTRICT Dated: May , 2013 WAYNE LEMIEUX Attorneys for Cross-Defendant LITTLEROCK CREEK IRRIGATION DISTRICT AND PALM RANCH IRRIGATION DISTRICT Dated: May , 2013 THOMAS BUNN III Attorneys for Cross-Defendant PALMDALE WATER DISTRICT Dated: May ____, 2013 BRADLEY T. WEEKS Attorneys for Cross-Defendant QUARTZ HILL WATER DISTRICT STIPULATION WITH DELMAR D. VAN DAM, GERTRUDE J. VAN DAM, AND GARY VAN DAM FOR PHASE 4 TRIAL

The Law Offices of Young Wooldridge, LLP

Dated: May, 2013	JAMES L. MARKMAN STEVEN ORR Attorneys for Cross-Defendant CITY OF PALMDALE
	JAMES L. MARKMAN STEVEN ORR Attorneys for Cross-Defendant
Dated: May 2013	STEVEN ORR Attorneys for Cross-Defendant
Dated: May 2013	Attorneys for Cross-Defendant
Dated: May 2013	CITY OF PALMDALE
Dated: May 2013	
Dated: May 2013	
Dated: May 2013	
	Ву
	DOUGLAS J. EVERTZ
	Attorneys for Cross-Defendant CITY OF LANCASTER AND ROSAMON
	COMMUNITY SERVICES DISTRICT
Dated: May, 2013	By WAYNE LEMIEUX
	Attorneys for Cross-Defendant
	LITTLEROCK CREEK IRRIGATION DISTRICT AND PALM RANCH
	IRRIGATION DISTRICT
Dated: May 22013	By Thomas & France
weed. Had	THOMAS BUNN III
	Attorneys for Cross-Defendant PALMDALE WATER DISTRICT
Dated: May, 2013	Ву
	BRADLEY T. WEEKS Attorneys for Cross-Defendant
•	QUARTZ HILL WATER DISTRICT
CTORE ATTION WITH BUILDING	3
	Dated: May, 2013 Dated: May, 2013 Dated: May, 2013

The Law Offices Of

Young Wooldridge, LLF

EDLIABLITY PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS Baketsfield, CA 93301-5298 ® Telephone 661-327-9661 ® Facsimile 661-327-0720 ® http://www.youngwooldtidge.com 8 2 Dated: May ____, 2013 3 By JAMES L. MARKMAN 4 STEVEN ORR Attorneys for Cross-Defendant 5 CITY OF PALMDALE Dated: May ____, 2013 DOUGLAS J. EVERTZ Attorneys for Cross-Defendant CITY OF LANCASTER AND ROSAMOND COMMUNITY SERVICES DISTRICT 14 Dated: May , 2013 15 WAYNE LEMIEUX Attorneys for Cross-Defendant LITTLEROCK CREEK IRRIGATION DISTRICT AND PALM RANCH IRRIGATION DISTRICT * 1800 30th Street, Fourth Floor 20 21 Dated: May ____, 2013 22 THOMAS BUNN III Attorneys for Cross-Defendant 23 PALMDALE WATER DISTRICT Westchester Corporate Plaza 24 25 26 Dated: May 22, 2013 27 BRADLEY T. WEEKS 28 Attorneys for Cross-Defendant QUARTZ HILL WATER DISTRICT

> STIPULATION WITH DELMAR D. VAN DAM, GERTRUDE J. VAN DAM, AND GARY VAN DAM FOR PHASE 4 TRIAL

The Law Offices Of

Young Woothester Copporate Plaza • 1800 30th Sireel Fourth Floor • Bakerstield, CA 93301-5298 • Telephone 661-327-9661 • 1

http:	į
ø	
0720	4
7	ş
3	
 racsimile 661-527-0720 	9
¥	4.
7007	1(

16

22 23

24

25 26

27 28

/www.youngwooldridge.com 2 3

4

Dated: May ____, 2013

rneys for Cross-Defendant LIFORNIA WATER SERVICE COMPANY

Dated: May 24, 2013

THE LAW OFFICES OF YOUNG WOOLDRIDGE, LLP

Attorneys for DELMAR D. VAN DAM, GERTRUDE J. VAN DAM, AND

GARY VAN DAM

A LIMITED LIABILITY PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
Westchester Corporate Plaza • 1800 30th Street, Fourth Floor • Bakersfield, CA 93301-5298 • Telephone 661-327-9661 • Facsimile 661-327-0720 • http://www.youngwooldridge.com 10 11 12 13 15 18 19 20 21 22 23 24 25

26

27

28

1

2

3

4

5

7

Dated: May , 2013

By

JOHN TOOTLE Attorneys for Cross-Defendant CALIFORNIA WATER SERVICE **COMPANY**

Dated: May 21, 2013

THE LAW OFFICES OF YOUNG WOOLDRIDGE, LLP

Attorneys for DELMAR D. V GERTRUDE J. VAN DAM, AND

GARY VAN DAM

INCLUDING PROFESSIONAL CORPORATIONS 5298 • Telephone 661-327-961 • http://www.youngwooldridge.com

Westchester Corporate Plaza • 1800 30th Street, Fourth Floor • Bakersfield, CA 93301-5298

20

21

22

23

25

26

27

28

2

3

11

12

13

15

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 23, 2013, I caused the below listed document(s) entitled as: STIPULATION WITH DELMAR D. VAN DAM, GERTRUDE J. VAN DAM, AND GARY VAN DAM FOR PHASE 4 TRIAL, to be served on the parties via the following service:

(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.

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