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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 WDS California II, LLC

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 WDS CALIFORNIA II, LLC FOR PHASE 4 TRIAL

A LIMITED LIABILITY PARTINERSEIP INCLUDING PROFESSIONAL CORPORATIONS
Westchester Corporate Plaza • 1800 30th Street, Fourth Floor • Bakersfield, CA 9330L-5298 • Telephone 661-327-9661 • Facsimile 661-327-0720 • http://www.youngwooldridge.com oung Wooldridge, LLP

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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 WDS California II, LLC ("WDS".)

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 WDS was 2,244 acrefeet in 2011 and 2,550 acre-feet in 2012.

Dated: May 24, 2013

BEST BEST & KRIEGER LLP

EFANIE D. HEDLUND

Attorneys for Cross-Complainant

LOS ANGELES COUNTY

WATERWORKS DISTRICT NO. 40

Young Wooldridge, LLP

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6 second		DOUGLAS J. EVERTZ
E 10		Attorneys for Cross-Defendant CITY OF LANCASTER AND ROSAMOND
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° 14	Dated: May, 2013	Ву
ž 15		WAYNE LEMIEUX Attorneys for Cross-Defendant
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1 21	· · · · · · · · · · · · · · · · · · ·	THOMAS BUNN III
± 22		Attorneys for Cross-Defendant PALMDALE WATER DISTRICT
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Westchester Corporate Plaza • 1800 30 th Street, Fourth Floor • Bakersfield, CA 93301-5298 • Telephone 661-327-9661 • Facsionite 661-327-0720 • http://www.youngwooldridge.com		
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The Law Offices Of
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	Dated: May, 2013	By JAMES L. MARKMAN
		STEVEN ORR
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WESTCHESTER COPPUTATE PLAZA • 1800 30th Street, Fourth Floor • Bakerstield, CA 93301-3298 • Telephone 661-327-9661 • F2 CITY OF LANCASTER AND ROSAMOND COMMUNITY SERVICES DISTRICT 13 Dated: May WAYNE LEMIEUX 15 Attorneys for Cross-Defendant LITTLEROCK CREEK IRRIGATION DISTRICT AND PALM RANCH IRRIGATION DISTRICT 18 20 Dated: May 21 Attorneys for Cross-Defendant 22 PALMDALE WATER DISTRICT 23 24 25 Dated: May ____, 2013 26 BRADLEY T. WEEKS 27 Attorneys for Cross-Defendant QUARTZ HILL WATER DISTRICT 28

STIPULATION WITH WDS CALIFORNIA II, LLC FOR PHASE 4 TRIAL

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A LIMITED LIABILITY PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS WESTCHESTER COTPORAGE PHAZA • 1800 30th Street, Fourth Floor • Bakeysfield, CA 93301-5298 • Telephone 661-327-3661 • F.

Facsimile 661-327-9720 . http://www.youngwooldridge.com Dated: May , 2013 2 JAMES L. MARKMAN 3 STEVEN ORR Attorneys for Cross-Defendant 4 CITY OF PALMDALE 5 6 7 Dated: May ____, 2013 8 By DOUGLAS J. EVERTZ Attorneys for Cross-Defendant CITY OF LANCASTER AND ROSAMOND COMMUNITY SERVICES DISTRICT 12 13 Dated: May ____, 2013 14 By WAYNE LEMIEUX 15 Attorneys for Cross-Defendant LITTLEROCK CREEK IRRIGATION DISTRICT AND PALM RANCH IRRIGATION DISTRICT 19 20 Dated: May , 2013 21 THOMAS BUNN III Attorneys for Cross-Defendant 22 PALMDALE WATER DISTRICT 23 24 25 Dated: May 22, 2013 26 BRADLEY T. WEEKS 27 Attorneys for Cross-Defendant QUARTZ HILL WATER DISTRICT 28

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Dated: May ____, 2013

JOHN TOOTLE
Attorneys for Cross-Defendant
CALIFORNIA WATER SERVICE
COMPANY

Dated: May 21, 2013

THE LAW OFFICES OF YOUNG WOOLDRIDGE, LLP

Attorneys for Cross-Defendant WDS CALIFORNIA II, LLC

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Dated: May ____, 2013

 $By_{\underline{}}$

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

Dated: May 21, 2013

THE LAW OFFICES OF YOUNG WOOLDRIDGE, LLP

Attorneys for Cross-Defendant WDS CALIFORNIA II, LLC

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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 WDS CALIFORNIA II, LLC 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.

(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.