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10 Attorneys for Defendant CITY OF LOS ANGELES and
LOS ANGELES WORLD AIRPORTS

11 Attorneys for City of Los Angeles and Los
12 Angeles World Airports

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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
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28

Judicial Council Coordination
Proceeding No. 4408

LEAD CASE: LASC Case No. BC 325201

**STIPULATION REGARDING SCOPE OF
HEARING ON ZAMRZLA MOTIONS;
[REPOSED] ORDER**

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

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1 produce, if any, pursuant to California water law, the Judgement and other such relevant legal
2 authority, and the monetary, injunctive and declaratory relief to which the Watermaster may be
3 entitled, if any, pursuant to the Watermaster Motion are reserved for a later date pending the outcome
4 of the Hearing.

5 3. **Briefing.** The Parties may, at their discretion, submit trial briefs ahead of the Hearing
6 in accordance with the Code of Civil Procedure and local rules of court.

7 4. **Exchange of Witness List and Trial Exhibits.**

8 a. The Parties shall exchange a list of all witnesses and trial exhibits that each
9 Party intends to call or introduce in its case in chief by Wednesday, February 22, 2023.

10 b. The Parties shall exchange a list of all rebuttal witnesses and exhibits by
11 Wednesday, March 1, 2023.

12 c. The Parties are not required to disclose impeachment witnesses and exhibits
13 in advance of the Hearing.

14 d. The Parties agree that declarations in support of and in opposition to the
15 Parties' Motions are admissible in lieu of live testimony.

16 5. **Experts.** None of the Parties disclosed retained experts or disclosed expert reports.
17 Accordingly, absent order of the Court, no expert reports will be submitted and no retained experts
18 will testify. The Zamrzlas identified Rick Koch of Southern California Edison as a non-retained
19 expert whose testimony will be limited to the statements contained in his declaration.

20 6. **Court reporter.** The Zamrzlas will arrange for a court reporter for the Hearing. The
21 Parties will equally share the cost among the Settling Parties (1/3), Watermaster (1/3) and the
22 Zamrzlas (1/3). If any additional party decides to separately oppose the Zamrzlas' Motions, the cost
23 will be further divided equally among the Parties and any additional party.

24 7. **Remote Hearing Logistics.** The Parties will meet and confer by Wednesday, March
25 1, 2023, to determine remote hearing logistics.

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1 DATED: February 13, 2023

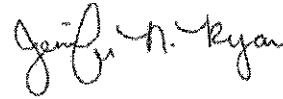
KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD
A Professional Corporation

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By:



Eric N. Robinson

Jenifer N. Ryan

Attorneys for CITY OF LOS ANGELES and
LOS ANGELES WORLD AIRPORTS

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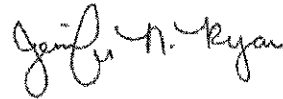
DATED: February 13, 2023

LEBEAU THELEN LLP

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By:



for

Robert G. Kuhs

Attorneys for GRIMMWAY ENTERPRISES

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DATED: February 13, 2023

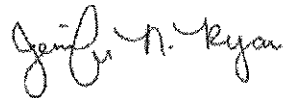
LAGERLOF, LLP

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By:



for

Thomas S. Bunn

Attorneys for PALMDALE WATER DISTRICT

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DATED: February 13, 2023

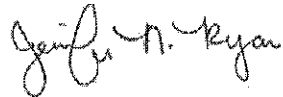
ELLISON, SCHNEIDER, HARRIS & DONLAN LLP

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By:



for

Christopher M. Sanders

Attorneys for COUNTY SANITATION

DISTRICTS OF LOS ANGELES COUNTY NOS.
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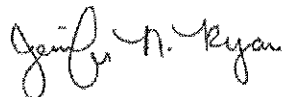
DATED: February 13, 2023

PRICE, POSTEL & PARMA LLP

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By:



for

Craig Parton

Attorneys for ANTELOPE VALLEY
WATERMASTER

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1 DATED: Feburary 13, 2023

MATHENY SEARS LINKERT & JAIME, LLP

2

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By:



Nicholas R. Shepard
Attorneys for JOHNNY ZAMRZLA, PAMELLA
ZAMRZLA, JOHNNY LEE ZAMRZLA AND
JEANETTE ZAMRZLA

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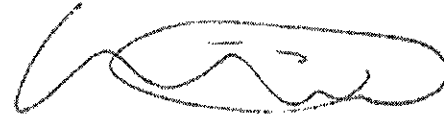
7 DATED: Feburary 13, 2023

ATKINSON, ANDELSON, LOYA RUUD & ROMO

8

9

By:



Wesley A. Miliband
Attorneys for JOHNNY ZAMRZLA, PAMELLA
ZAMRZLA, JOHNNY LEE ZAMRZLA AND
JEANETTE ZAMRZLA

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[PROPOSED] ORDER

The Court having read the foregoing Stipulation, and good cause appearing, **IT IS SO ORDERED.**

DATED: February 17 2023



Jack Komar

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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 13, 2023, I served true copies of the following document(s) described as **STIPULATION REGARDING SCOPE OF HEARING ON ZAMRZLA MOTIONS; [PROPOSED] ORDER** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY 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 13, 2023, at Sacramento, California.



Sherry Ramirez