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FAX COVER SHEET

DATE: 01-25-13

TO: Bryan Drake

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Number of Pages Including Cover Sheet: 5

RE: Stipulation

THANK YOU,

Julio Kyle

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6 DISTRICT NO. 40

**EXEMPT FROM FILING FEES  
UNDER GOVERNMENT CODE  
SECTION 6103**

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13  
14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
15 **COUNTY OF LOS ANGELES**  
16

17 **ANTELOPE VALLEY**  
18 **GROUNDWATER CASES**

Included Actions:  
19 Los Angeles County Waterworks District  
No. 40 v. Diamond Farming Co., Superior  
20 Court of California, County of Los  
Angeles, Case No. BC 325201;

21 Los Angeles County Waterworks District  
22 No. 40 v. Diamond Farming Co., Superior  
Court of California, County of Kern, Case  
23 No. S-1500-CV-254-348;

24 Wm. Bolthouse Farms, Inc. v. City of  
Lancaster, Diamond Farming Co. v. City of  
25 Lancaster, Diamond Farming Co. v.  
Palmdale Water Dist., Superior Court of  
26 California, County of Riverside, Case Nos.  
RIC 353 840, RIC 344 436, RIC 344 668  
27

Judicial Council Coordination No. 4408

**CLASS ACTION**

Santa Clara Case No. 1-05-CV-049053  
Assigned to The Honorable Jack Komar

**STIPULATION IN LIEU OF DEPOSITION  
TESTIMONY FOR PHASE 4 TRIAL**

28  
**STIPULATION**

LAW OFFICES OF  
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**STIPULATION**

Los Angeles Waterworks District No. 40, City of Palmdale, City of Lancaster, Little Rock 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"), and Julie Kyle hereby  
enter into the following stipulation with Julie Kyle.

Whereas, for purposes of the Phase 4 trial the above parties wish to enter into the  
following stipulation in lieu of taking depositions;

Whereas, Julie Kyle has signed the attached Declaration of Julie Kyle  
under penalty of perjury;

**NOW, THEREFORE**, in consideration and on the basis of the foregoing recitals, the  
Public Water Suppliers and Julie Kyle, enter into the following stipulation:

1. Based on the attached Declaration of Julie Kyle, the Public Water  
Suppliers will forego taking the deposition of Julie Kyle during discovery for the  
Phase 4 trial set for February 11, 2013;

2. The attached Declaration may be used in the same manner at trial as a deposition  
transcript executed under penalty of perjury by Julie Kyle.

3. The Public Water Suppliers reserve the right to depose Julie Kyle  
during discovery for subsequent trial phases or in the event the Court continues the Phase 4 trial  
to a date other than February 11, 2013; and

4. The Public Water Suppliers reserve their right to challenge the testimony of  
Julie Kyle at trial.

1 Dated: January \_\_, 2013

BEST BEST & KRIEGER LLP

2  
3 By

4 ERIC L. GARNER  
5 JEFFREY V. DUNN  
6 STEFANIE D. HEDLUND  
7 Attorneys for Cross-Complainant  
8 LOS ANGELES COUNTY  
9 WATERWORKS DISTRICT NO. 40

10 Dated: January \_\_, 2013

11 By

12 JAMES L. MARKMAN  
13 STEVEN ORR  
14 Attorneys for Cross-Defendant  
15 CITY OF PALMDALE

16 Dated: January \_\_, 2013

17 By

18 DOUGLAS J. EVERTZ  
19 Attorneys for Cross-Defendant  
20 CITY OF LANCASTER AND  
21 ROSAMOND COMMUNITY SERVICES  
22 DISTRICT

23 Dated: January \_\_, 2013

24 By

25 WAYNE LEMIEUX  
26 Attorneys for Cross-Defendant  
27 LITTLEROCK CREEK IRRIGATION  
28 DISTRICT AND PALM RANCH  
IRRIGATION DISTRICT

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1 Dated: January \_\_, 2013

2  
3 By \_\_\_\_\_

THOMAS BUNN III  
Attorneys for Cross-Defendant  
PALMDALE WATER DISTRICT

4  
5  
6 Dated: January \_\_, 2013

7  
8 By \_\_\_\_\_

BRADLEY T. WEEKS  
Attorneys for Cross-Defendant  
QUARTZ HILL WATER DISTRICT

9  
10  
11 Dated: January \_\_, 2013

12  
13 By \_\_\_\_\_

JOHN TOOTLE  
Attorneys for Cross-Defendant  
CALIFORNIA WATER SERVICE  
COMPANY

14  
15  
16 Dated: January 24, 2013

17  
18 By  \_\_\_\_\_

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