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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

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ANTELOPE VALLEY GROUNDWATER CASES

Included Actions:

Los Angeles County Waterworks District No. 40 v. Diamond Farming Co. Superior Court of California County of Los Angeles, Case No. BC 325 201 Los Angeles County Waterworks District No. 40 v. Diamond Farming Co. Superior Court of California, County of Kern, Case No. S-1500-CV-254-348 Wm. Bolthouse Farms, Inc. v. City of Lancaster Diamond Farming Co. v. City of Lancaster Diamond Farming Co. v. Palmdale Water Dist. Superior Court of California, County of Riverside, consolidated actions, Case No. RIC 353 840, RIC 344 436, RIC 344 668

Judicial Council Coordination Proceeding No. 4408

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

STIPULATION FOR PHASE IV TRIAL RE 2011-12 GROUNDWATER PUMPING BY TIERRA BONITA RANCH COMPANY

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Tierra Bonita Ranch Co., and the parties that have signed this Stipulation agree and stipulate, for the purposes of determining groundwater pumping during 2011 and 2012 for the Phase 4 trial only, as follows:

- 1. Groundwater pumping by Tierra Bonita Ranch Co. during the calendar year 2011 was 607 af.
- 2. Groundwater pumping by Tierra Bonita Ranch Co. during the calendar year 2012 was 403 af.
- 3. Consistent with the Court's Case Management Order, as amended, for the Phase 4 Four trial of this matter, Tierra Bonita Ranch Co. and the undersigned parties reserve, for a future phase of this action, determination of all other facts and legal issues in this action, including but not limited to:
- A. The determination of the groundwater rights of Tierra Bonita Ranch Co., including the applicability and application of all constitutional, statutory and decisional law;
- B. The ability to introduce in a later trial phase evidence of water use in years other than 2011 and 2012; and
- C. The determination of the reasonableness of water use by Tierra Bonita Ranch Co. during the period 2000 to 2012.

[signatures on following pages]

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BROWNSTEIN HYATT FARBER SCHRECK, LLP 21 East Carillo Street Senia Barbara, CA 93101-2706	1	Dated: May <u>26</u> , 2013	BROWNSTEIN HYATT FARBER SCHRECK, LLP
	2.		SCHRECK, LLP
	3 4		By: Bushy J. Hun
	5		MICHAEL 7. PIFE BRADLEY J. HERREMA
	6		Attorneys for ANTELOPE VALLEY GROUNDWATER AGREEMENT ASSOCIATION
	7		AGREEMENT ASSOCIATION
	8	Dated: May 14, 2013	BEST BEST & KRIEGER LLP
	9		
	10	,	By Lang 12 Dunns
	11	·	ERICIV. CARNER JEFFREY V. DUNN
	12	i .	STEFANIE D. HEDLUND
	13		Attorneys for Cross-Complainant LOS ANGELES COUNTY WATERWORKS DISTRICT NO. 40
	14		
	15	Dated: May, 2013	
	16		
	17		By
	18		STEVEN ORR
	19	,	Attorneys for Cross-Defendant CITY OF PALMDALE
	20	24	
	21	Dated: May	
	22		By A Degley (Mul)
	23		DOUGLAS J. EVERTE Attorneys for Cross-Defendant CITY OF LANCASTER AND
	24		ROSAMOND COMMUNITY SERVICES
	25		DISTRICT
	26		
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Ву	WAYNE LEMIE	JX
	Attorneys for Cros	ss-Defendant REEK IRRIGATION PALM RANCH
Ву		15.00
	THOMAS BUNN Attorneys for Cros PALMDALE WA	ss-Defendant
By	BRADLEY T. WE Attorneys for Cros	s-Defendant
	QUARTZ HILL V	VATER DISTRICT
Ву		
	JOHN TOOTLE Attorneys for Cros CALIFORNIA WA COMPANY	

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