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Exempt from Filing Fees
Government Code § 6103

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8 Antelope Valley Watermaster

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF LOS ANGELES - CENTRAL DISTRICT**

12 Coordination Proceeding,
Special Title (Rule 1550(b))

Judicial Council Coordination
Proceeding No. 4408

LASC Case No.: BC 325201

14 **ANTELOPE VALLEY**
15 **GROUNDWATER CASES**

Santa Clara Court Case No. 1-05-CV-049053
Assigned to the Hon. Jack Komar, Judge of
the Santa Clara Superior Court

18 AND ALL RELATED ACTIONS

**WATERMASTER'S RENEWED
MOTION FOR MONETARY,
DECLARATORY AND INJUNCTIVE
RELIEF AGAINST ZAMRZLAS;
REQUEST TO SET HEARING;
DECLARATION OF CRAIG A. PARTON;
EXHIBITS A & B**

Date:
Time:
Dept.:

22 **TO ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD:**

23 The Antelope Valley Watermaster ("Watermaster") hereby renews its motion for
24 monetary, declaratory and injunctive relief against Johnny Zamrzla and Pamella Zamrzla,¹
25 individually and as Trustees of the Johnny and Pamella Zamrzla 1999 Family Trust created u/d/t
26

27
28 ¹ The Watermaster is informed and believes that Pamella Zamrzla passed away on May 21, 2023.
The Motion originally named Pamella and Johnny, although the Watermaster is informed and
believes that Johnny is the sole remaining Party and Trustee involved in the present dispute.

1 dated April 30, 1999 (“J&P”), and against John Lee Zamrzla and Jeanette Zamrzla (“J&J”, and
2 collectively with J&P, the “Zamrzlas”) filed with this Court on September 29, 2021 (the
3 “Watermaster Motion”), and requests that the Court set a hearing on the Watermaster Motion to
4 award the injunctive relief requested therein, and to liquidate all past-due RWAs, AAs, interest
5 thereon, and attorneys’ fees requested therein.

6 I. PROCEDURAL HISTORY

7 The Watermaster filed the Watermaster Motion on September 29, 2021, seeking: (1)
8 \$28,755.35 in delinquent Replacement Water Assessments (“RWAs”) for the year 2018, plus
9 accrued interest of \$2,875.54 as to J&P; (2) \$6,415.90 in delinquent RWAs for the year 2018,
10 plus accrued interest of \$641.59 as to J&J; (3) attorneys’ fees of \$7,437 as to the Zamrzlas jointly
11 and severally; and (4) for such declaratory and injunctive relief as is necessary to prohibit the
12 Zamrzlas from producing any further groundwater from the Basin until all such delinquent 2018
13 RWAs with interest and fees are paid in full, the Zamrzlas each install water flow meters on all of
14 their respective wells, submit Annual Water Production Reports for years 2016 through 2020, and
15 pay RWAs and Administrative Assessments (“AAs”) for their respective annual production for
16 the years 2016 through 2020, plus accrued interest thereon.

17 The Watermaster Motion sought this relief on the basis that the Zamrzlas are members of
18 the Small Pumper Class under the Judgment and subject to the Jurisdiction of this Court, self-
19 reported production in excess of the Small Pumper Class allowance in the year 2018, and failed to
20 provide production reports for other years.

21 Opposition and Reply papers were filed. Among other arguments, the Zamrzlas alleged
22 that they are not properly named as members of the Small Pumper Class, and that they are not
23 subject to the Court’s jurisdiction under the Judgment. A hearing was held on January 5, 2022, at
24 which time the Court directed the parties to discuss options for potential resolution of the dispute.
25 On February 28, 2022, the Court issued a Notice of Hearing, directing that the Watermaster
26 Motion “is reset for jurisdiction hearing on March 4, 2022,” and that the parties were to meet and
27 confer “and establish an agreement whereby the court has jurisdiction to consider the water
28 entitlement of the Zamrzla parties and to set a hearing for an [sic] evidentiary hearing to

1 determine such water entitlement.”

2 At the March 4, 2022 hearing, the Court clarified that the Watermaster Motion “is
3 pending” and has “not been denied,” and recommended that if the Zamrzlas dispute their status as
4 Small Pumper Class members, they should file “a motion or a petition to the Court to modify that
5 finding.” (March 4, 2022 hearing Transcript at 10:15-11:16; 14:13-20.)

6 Counsel for the Zamrzlas at the time, Robert Brumfield, then suggested that “we could
7 hold [the Watermaster Motion] in abeyance and just leave it on calendar until such time as the
8 Zamrzla motion [to modify or set aside the Judgment] is filed and just track along with whatever
9 dates we’re doing without it being ruled upon and **no further briefing argument [sic] really**
10 **necessary—we’ve already done that**—and just let it track along.” (March 4, 2022 hearing
11 Transcript at 12:24-13:8 (emphasis added).) The Court agreed with Mr. Brumfield’s
12 recommendation, and noted that the Watermaster would not need to re-file the Watermaster
13 Motion after the Zamrzlas’ motion to modify or set aside the Judgment is ruled upon. (March 4,
14 2022 hearing Transcript at 19:19-20:2.) The Court noted further that if the Zamrzlas are
15 unsuccessful in their attempts to remove themselves from the Small Pumper Class and the
16 jurisdiction of the Court, “the next consequence is going to be that I am going to make a finding
17 that the assessment is going to be based upon the replacement water assessment in excess of the
18 small pumper class entitlement.” (March 4, 2022 hearing Transcript at 21:1-13.)

19 In summary, the Court determined that it would grant the Watermaster Motion in the event
20 the Zamrzlas failed to extricate themselves from the Small Pumper Class, without the necessity of
21 the Watermaster re-filing the Watermaster Motion or any further briefing on the matter. The
22 Court concluded the March 4, 2022 hearing as follows:

23 “And let me put it this way. As I said to you earlier, the evidence that I have before
24 me establishes [the Zamrzlas] are members of the small pumper class. And that
25 means that the replacement water assessment would be predicated upon pumping in
26 excess of the allocated amounts for that class so that if Mr. Brumfield and his clients
27 wish to not have that assessment, they need to file appropriate papers.” (March 4,
28 2022 hearing Transcript at 23:14-22.)

1 Those papers were filed by the Zamrzlas in the form of two motions each titled “Motion to Set
2 Aside or Modify Judgment,” filed on or about April 11, 2022, challenging the Zamrzlas’ status as
3 members of the Small Pumper Class and the Court’s jurisdiction over them (collectively, the
4 “**Zamrzla Motions**”). Discovery was completed, Opposition, Reply and Trial Briefs were filed,
5 an in-person hearing was held on March 15-16, 2023, followed by Closing Briefs, and on June 9,
6 2023, the Court entered an Order Denying the Zamrzlas’ Motions (the “**Order**”). The Zamrzlas
7 have appealed the Order, which appeal is currently pending.

8 **II. ARGUMENT**

9 At the March 4, 2022 hearing, the Court stated that the Watermaster Motion was
10 “pending” and “has not been denied,” and that the Court was offering the Zamrzlas a chance to
11 restructure their argument in order to avoid the relief sought by the Watermaster Motion. (March
12 4, 2022 hearing Transcript at 14:13-20). Then for over a year the Zamrzlas litigated and
13 eventually lost their argument that this Court lacks jurisdiction over them as Small Pumper Class
14 Members. Pursuant to the Order, the Court found that the Zamrzlas are Small Pumper Class
15 members subject to the Court’s jurisdiction, and the Watermaster is now entitled to a ruling on the
16 Watermaster Motion to liquidate the monetary amounts sought therein, as amended hereby.

17 **A. Past-Due RWAs; Interest**

18 As set forth in detail in the Watermaster Motion, because the Zamrzlas are members of the
19 Small Pumper Class, any production above 3 acre-feet per year per parcel improved with a well
20 will be subject to RWAs. The Zamrzlas each submitted production reports for the years 2018, and
21 do not dispute that they produced the amounts set forth in their respective production reports.
22 None of the Zamrzlas’ briefing ever disputed the Watermaster’s calculations of the RWAs owed
23 by the Zamrzlas for the year 2018 (assuming the Zamrzlas are members of the Small Pumper
24 Class). The Watermaster is also entitled to recover a 10% penalty for past-due RWAs, in the
25 amount and for the reasons set forth in the Watermaster Motion. No further briefing or evidence is
26 necessary on this topic, and the Court should enter judgment in favor of the Watermaster and
27 against the Zamrzlas for past-due RWAs and interest thereon as set forth in the Watermaster
28 Motion.

1 **B. Attorneys' Fees**

2 As set forth in detail in the Watermaster Motion, the Judgment and the Watermaster Rules
3 and Regulations authorize the Watermaster to recover its “costs of suit, attorneys fees and
4 reasonable costs of collection” in any action to collect delinquent assessments. (Judgment at ¶
5 18.4.12; R&Rs at § 19.g.) The Watermaster Motion originally sought a total of \$7,437 in
6 attorneys’ fees incurred to recover the delinquent assessments from the Zamrzlas. Since filing the
7 Watermaster Motion in the fall of 2021, the Watermaster has incurred significantly more
8 attorneys’ fees defeating the Zamrzlas’ attempts to thwart collection efforts by extricating
9 themselves from the Small Pumper Class Members subject to the Court’s jurisdiction. The
10 Zamrzlas’ efforts to modify or set aside the Judgment in this regard have failed, but the
11 Watermaster’s fees incurred to defeat the Zamrzla Motions were a necessary component of its
12 efforts to recover the assessments sought in the Watermaster Motion. Therefore the Watermaster
13 hereby requests attorneys’ fees in the total amount of \$147,675.00. (Parton Decl. at ¶4-7, Exh. B.)

14 Attached to the Declaration of Craig A. Parton as Exhibit “B” is a compilation of the
15 Watermaster’s billing records from November 4, 2021 through September 1, 2023, reflecting all
16 legal expenses the Watermaster has incurred in seeking to collect the Zamrzlas’ delinquent
17 assessments, including but not limited to defeating the Zamrzlas’ efforts to set aside or modify the
18 Judgment in order to avoid their obligation to pay the assessments demanded in the Watermaster
19 Motion. The Declaration of Mr. Parton establishes the reasonableness of the fees sought, as more
20 particularly set forth in the Watermaster Motion.

21 **C. The Zamrzlas’ Appeal of the Order Does Not Stay Enforcement of the**
22 **Judgment**

23 As the Court is probably aware, on June 23, 2023, the Zamrzlas filed a notice of appeal
24 from the Order. The Zamrzlas’ appeal does not, however, stay enforcement of the Judgment, for
25 two reasons. First, judgments and orders that are self-executing (i.e., no process for their
26 enforcement is required) are not automatically stayed by the filing of an appeal. “The rule has
27 always been that ‘[i]f the judgment is self-executing and requires no process for its enforcement,
28

1 there is no statutory stay and, as a general rule, supersedeas is equally inappropriate.” (*Veyna v.*
2 *Orange County Nursery, Inc.* (2009) 170 Cal.App.4th 146, 156.)

3 In this case, the Order denying the Zamrzlas’ motion to set aside the Judgment is a self-
4 executing order because it requires no process for its enforcement; it simply denies the relief
5 sought by the Zamrzlas. Since the Order is self-executing, the automatic stay of Code of Civil
6 Procedure section 916 does not apply to the Zamrzlas’ appeal of the Order.

7 Second and more importantly, the Judgment is not stayed because the Zamrzlas are
8 appealing the Order, not the Judgment itself. It is well established that “[i]f an appeal is taken
9 from an order after final judgment [citation] but not from the judgment itself, a stay of the
10 appealed order does not stay the underlying judgment [citation].” (*People v. American Surety Co.*
11 (2019) 31 Cal.App.5th 380, 393; see also *Miller v. Gross* (1975) 48 Cal.App.3d 608, 612-613
12 [appeal from denial of motion to vacate judgment did not stay enforcement of the underlying
13 judgment]; Eisenberg et al., Cal. Practice Guide: Civil Appeals and Writs (The Rutter Group
14 2022) ¶7.269 p. 7-77.)

15 In light of this rule, even if the Zamrzlas’ appeal stayed the Order (which it does not), their
16 appeal would not stay enforcement of the Judgment. The Court instead is fully empowered to
17 grant the relief requested herein notwithstanding the Zamrzlas’ appeal of the Order. Nevertheless,
18 the Watermaster will agree not to seek to enforce the money judgment against the Zamrzlas
19 during the pendency of the appeal of the Order.

20 **III. Conclusion**


21 The Watermaster respectfully requests that the Court set a hearing to rule on the
22 Watermaster Motion, award the injunctive and declaratory relief sought therein, and enter a
23 money judgment in favor of the Watermaster and against the Zamrzlas as follows: (1) \$28,755.35
24 in delinquent RWAs for the year 2018, plus accrued interest of \$2,875.54 as to J&P; (2)
25 \$6,415.90 in delinquent RWAs for the year 2018, plus accrued interest of \$641.59 as to J&J; and
26 (3) \$147,675.00 in attorneys’ fees as to the Zamrzlas jointly and severally.

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Respectfully submitted,

Dated: October 11, 2023

PRICE, POSTEL & PARMA LLP

By: 
CRAIG A. PARTON
TIMOTHY E. METZINGER
CAMERON GOODMAN
Attorneys for
Antelope Valley Watermaster

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1 to merely ignore its obligation to pay these vitally important RWAs so that the Watermaster can
2 purchase water to replenish the Basin.

3 7. In addition to the time necessary to bring the original Watermaster Motion in 2021,
4 additional PPP time has been necessary to defeat the Zamrzlas' efforts to extricate themselves from
5 the Small Pumper Class and the jurisdiction of this Court, which lasted over a year of extensive
6 discovery, litigation, trial and briefing, and which is now up on appeal. Further PPP time will be
7 necessary to reply to prepare for and attend the hearing requested herein, and subsequently to
8 enforce the money judgment sought herein.

9 I declare under penalty of perjury under the laws of the State of California that the
10 foregoing is true and correct.

11
12 Dated: October 11, 2023



CRAIG A. PARTON

Exhibit A

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

Coordination Proceeding)
Special Title (Rule 1550(b)))
) LASC Case No.
) BC325201
ANTELOPE VALLEY GROUNDWATER) Santa Clara Court Case
CASES,) Case No. 1-05-CU-049053
)
_____)
)
AND ALL RELATED ACTIONS.)
)
) Defendants.
_____)

Reporter's Telephonic Transcript of
Proceedings taken remotely before HON. JACK KOMAR
beginning at 9:00 a.m. and ending at 9:32 a.m. on
Friday, March 4, 2022, before JOANNA BROADWELL,
Certified Shorthand Reporter No. 10959.

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Continued Appearances - Page 4)

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1 (Continued Appearances - Page 5)

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Page 7

Continued Appearances - Page 6)

For Cross-defendant and Respondent U.S. Borax, Inc.:

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Also Present: J. Ukkestad, John Zanrzlas and Rowena Walker.

1 Friday, March 4, 2022

2 9:00 a.m.

3 REPORTER'S VIDEOCONFERENCE TRANSCRIPT OF PROCEEDINGS

4 THE COURT: Good morning. This is Judge Komar.
5 This is in the matter of the motion by the Watermaster
6 concerning the Zamrzlas. And I have received proposed
7 orders from Mr. Parton, Mr. Brumfield and a proposed
8 order from what purports to be from the landowner
9 parties and the settling parties who are proposing also
10 a proposed order here.

11 So Mr. Parton and Mr. Brumfield, is there
12 anything further that either of you want to add before
13 we hear from the other parties?

14 MR. PARTON: Your Honor, Craig Parton for the
15 Watermaster. We saw the proposed order from the
16 landowner parties and think that it's a very
17 constructive proposal. So if the Court wants to
18 consider, that the Watermaster's view is that we have no
19 objection to it. Our order sought to capture this
20 Court's direction provided back on February 18th if not
21 earlier than that in terms of how to resolve the matter.
22 And we think Mr. Brumfield's order for a number of
23 reasons is not sufficient.

24 THE COURT: Okay. Let me just interrupt by
25 telling you everybody is very faint on this line for

Page 9

1 some reason. And I think what you just said,
2 Mr. Parton, is that you have no objection to the
3 landowner's recommended proposed order; is that correct?

4 MR. PARTON: That is correct, Your Honor, and
5 several problems with Mr. Brumfield's proposed order.
6 We don't think that it takes into account what this
7 Court directed back on February 18th. There is no meet
8 and confer process for other interested parties.

9 The Watermaster is not allowed to take a position
10 on the motion. We think that's inappropriate. And he
11 wants four months to file a motion, and then if he
12 doesn't we're back to filing the motion and arguing
13 again the same things we have been arguing for four
14 months. So we think for those reasons --

15 THE COURT: Let me make an observation here. It
16 seems to me that we're right back where we were at the
17 first hearing when it was obvious to me that there was a
18 dispute by the respondents to the contention that they
19 were a small pumper class.

20 And I indicated at that time that if they felt
21 that way there were several options, but one of them was
22 a motion or a petition to the Court to modify that
23 finding. Because it is a very clear to me that there
24 was a finding that at least two of the parties were
25 members of the small pumper class. And that limits the

1 amount of pumping that they can do and increases,
2 obviously, the amount of cost to them in the event that
3 there is a finding that they are pumping in excess of
4 the amount that they are entitled to.

5 And if that happens to be the case then the
6 people who are pumping have to determine what their
7 pumping status is. And the proper way to do that,
8 obviously, is by filing an evidentiary motion, a motion
9 that will be supported by evidence so that the Court can
10 make a finding as to what their historic entitlement
11 might be.

12 Then they have to then go to the next step and
13 negotiate a reduction if they wish to be a part of the
14 stipulated settlement. And so far none of that has
15 happened. The motion was continued. It was not denied.
16 It was not taken off calendar. And I don't intend to
17 deny the motion by the Watermaster at this time pending
18 the appropriate either agreement if they can reach such
19 an agreement with both the Watermaster and the landowner
20 parties, the stipulating parties, or they can then file
21 whatever appropriate motions they wish to to modify the
22 judgment in terms of their status.

23 And I think that is essentially, as I read
24 quickly, the landowner's proposed order of what is in
25 place. And it seems to me that at this point the burden

1 really is on by Mr. Brumfield's clients to move to do
2 something other than to permit the Court to make a
3 finding that their small pumper class and that their
4 replacement water assessment is going to be based upon
5 that kind of an entitlement. So I would be happy to
6 hear from anybody else that wishes to address this
7 issue.

8 MR. BRUMFIELD: Your Honor, this is
9 Mr. Brumfield. Mr. Parton and I are the only two
10 parties actually to this motion. Back on December 10
11 you suggested along the lines of what you were just
12 saying. And basically the parties stipulate the court
13 has conferred jurisdiction. That is fine. We are not
14 disputing that. And we've had to invoke a procedure to
15 determine the amount of the entitlement.

16 You know, regardless of the failed efforts to try
17 to wordsmith those two simple concepts of what is now a
18 five and six-page long stipulation it seems as though we
19 both, Watermaster and the Zamrzlas, agreed to that
20 concept. Whether early determining the amount of
21 entitlement starts off with a motion to modify your
22 findings, which is what the Court is wanting, and that
23 is fine, I think that is probably okay with us.

24 And I was just thinking as an alternative to this
25 issue before the hearing, before the Court's comments in

1 regards to the Watermaster's motion of not denying it
2 today or ruling on it today, perhaps we could hold that
3 motion in abeyance and just leave it on calendar until
4 such time as the Zamrzla's motion is filed and just
5 track along with whatever dates we're doing without it
6 being ruled upon and no further briefing argument really
7 necessary -- we've already done that -- and just let it
8 track along.

9 The Zamrzlas aren't going to sit around.
10 Mr. Parton makes the claim, oh, they sat around idly.
11 I'll just remind the Court that the Watermaster sat
12 around and did nothing for at least a year before they
13 filed this motion. And the pleadings clearly showed
14 that parties didn't just sit around. There were many,
15 many conversations trying to work things out. So that
16 is sort of a bit of an exaggeration.

17 But I think as to the simple concepts we're in
18 agreement. It's just been difficult trying to wordsmith
19 something that everybody can agree. And obviously
20 lawyers see different meanings in different words, and
21 we're just not able to come together on this lengthy
22 stipulation.

23 I think the OSC process is also inappropriate.
24 That is not something that's ever been contemplated
25 without the landowners -- excuse me, the landowner's

1 order and I think the settling parties so-called filed
2 and settled order. That's not been contemplated at all
3 in the process in the last two and a half months between
4 the Watermaster and the Zamrzlas. I don't think it is,
5 quite honestly, properly before the Court.

6 THE COURT: Well, I disagree with you. I think
7 that the proposed landowner's proposed order is amicus
8 curiae. And they are parties here, and there is no
9 question that any kind of order that I make has to deal
10 with the fact that there are multiple other parties
11 pumping in this aquifer and that they have a right to be
12 heard.

13 So as far as I am concerned the central point
14 here is this. The order -- I'm sorry -- the motion by
15 the Watermaster is pending. It's not been denied. The
16 Court offered Counsel an opportunity to try to
17 restructure the position that their clients -- that your
18 clients have, Mr. Brumfield, with regard to their
19 pumping rights in this valley. But that has to occur
20 with a motion and/or a settlement among all the parties.

21 And there is no way that the Watermaster can
22 stipulate to a specific amount. And if I ever said that
23 it was -- I was misspeaking. He does not have that
24 power. But that means there has to be a finding based
25 upon evidence as to what the entitlement is.

1 of what the Zamrzlas commit to do. And if they will
2 commit in 45 days to file a motion essentially
3 challenging their status as small pumper class members
4 that moves the ball along.

5 THE COURT: I think that is appropriate. I think
6 that is appropriate. I think Mr. Brumfield agrees
7 that's another way of doing it. So let's let me see if
8 I can --

9 MR. BRUMFIELD: I'm sorry.

10 THE COURT: Say that again?

11 MR. BRUMFIELD: I'm saying -- this is
12 Mr. Brumfield -- I think we can probably stipulate to
13 that in the next couple or three days if the Court would
14 prefer that.

15 THE COURT: Well, I think we should have a
16 hearing, and you should have an opportunity to establish
17 what your pumping rights are.

18 MR. BRUMFIELD: Yes.

19 THE COURT: And I think if we set that for the
20 20th, and that means you are going to have to present
21 both some authorities as well as some evidence to
22 support your position, then we can make a ruling at
23 least tentatively as to what your entitlement might be
24 as well as give Mr. Parton an opportunity then to
25 without having to refile his motion establish what the

1 current assessment should be. Does anybody have any
2 objection to that?

3 MR. BUNN: Your Honor, this is Thomas Bunn for
4 Palmdale Water District.

5 THE COURT: Yes, Mr. Bunn.

6 MR. BUNN: That proposal that had been called the
7 landowner's proposal did have a one public water
8 supplier, namely my client, subscribing to it. But I
9 would like it to be clear whether we're actually going
10 to be trying or trying to settle the amount of the
11 entitlement in this initial phase. Our thought was that
12 we would first settle whether Mr. Brumfield's clients
13 are appropriately remaining in the small pumper class or
14 whether, in fact, they might be entitled to more of that
15 rather than trying to figure out the amount of the "more
16 of that" which proved in an earlier case when we did
17 that, that was quite a complex procedure to try and come
18 up with an amount.

19 So it was the landowner's thought and my thought
20 that we would first determine whether he would stay in
21 the non -- in the small pumper class.

22 THE COURT: Well, at this point they are in the
23 small pumper class. There is no question about that.
24 At least two of them are.

25 MR. BUNN: Right.

1 THE COURT: It seems to me that if they wished to
2 modify the judgment to exclude them from that status,
3 that's going to require a formal hearing with notice and
4 obviously some evidentiary proof to establish that this
5 was a mistake. And equity has the power to deal with
6 that.

7 And I would invite Counsel, Mr. Brumfield, to
8 provide as much in support of his client's position as
9 he can and to do that by the 20th. And if you don't do
10 that, the next consequence is going to be that I am
11 going to make a finding that the assessment is going to
12 be based upon the replacement water assessment in excess
13 of the small pumper class entitlement.

14 And I don't think that's in your client's best
15 interest at this point if what they are saying is true.
16 So that's up to you, Mr. Brumfield. And I was trying to
17 see if there was a way we could save your client's time
18 and effort and attorneys' fees by entering into some
19 sort of an agreement with the Watermaster and others so
20 that that was not going to be a problem.

21 Now the other thing that I think you all
22 remember --

23 MR. BRUMFIELD: Your Honor, you cut out there.

24 THE COURT/CALL OPERATOR: Hello. This is the
25 CourtCall operator. Please stay on the line one moment.

1 So at this point I think what we need to do is
2 reset this matter. I will set it for April 20th. I
3 wish you well with your surgery, Mr. Brumfield, and see
4 where we go from there. But I expect that the parties
5 will have a substantial agreement as to a number of
6 these issues by the 20th with notice to me so that I
7 know what I am going to be dealing with at that time.
8 And if you could give me notice more than one day prior
9 to the hearing that would be helpful.

10 MR. PARTON: Your Honor, what will occur on
11 April 20th? Is Mr. Brumfield being directed to file a
12 motion to modify the judgment to not be included in the
13 small pumper class by that date?

14 THE COURT: Well, yes, he should. And let me put
15 it this way. As I said to you earlier, the evidence
16 that I have before me establishes they are members of
17 the small pumper class. And that means that the
18 replacement water assessment would be predicated upon
19 pumping in excess of the allocated amounts for that
20 class so that if Mr. Brumfield and his clients wish to
21 not have that assessment, they need to file appropriate
22 papers.

23 MR. PARTON: And the approved -- those papers
24 would be filed before April 20th?

25 THE COURT: Absolutely.

1 line with us?

2 THE COURT: Unfortunately you were breaking up.
3 I couldn't hear what you said.

4 MR. BUNN: This is Mr. Bunn. She was asking for
5 appearances. It was the reporter asking for
6 appearances.

7 THE COURT: Okay. CourtCall should have that
8 list of everybody who signed in. I think Mrs. Walker
9 has it.

10 MS. WALKER: Your Honor, I'll provide it to the
11 reporter. This is Rowena Walker.

12 THE COURT: All right. Anything else we need to
13 deal with here this morning?

14 MR. BRUMFIELD: This is Mr. Brumfield. I don't
15 think so.

16 THE COURT: All right. Thank you very much. I
17 will be looking to read your motion, and we'll talk to
18 you on May the 3rd.

19 MR. PARTON: Is that at 9:00 a.m., Your Honor?
20 Craig Parton for the Watermaster.

21 THE COURT: Yes. Okay. Thank you very much
22 everybody. We're adjourned.

23

24 (TIME NOTED: 9:32 a.m.)

25

1 I, the undersigned, a Certified Shorthand
2 Reporter of the State of California, do hereby
3 certify:


4 That the foregoing proceedings were taken
5 before me at the time and place herein set forth;
6 that any witnesses in the foregoing proceedings,
7 prior to testifying, were administered an oath; that
8 a record of the proceedings was made by me using
9 machine shorthand which was thereafter transcribed
10 under my direction; that the foregoing transcript is
11 a true record of the testimony given.

12 Further, that if the foregoing pertains to
13 the original transcript of a deposition in a Federal
14 Case, before completion of the proceedings, review
15 of the transcript [] was [] was not requested.

16 I further certify I am neither financially
17 interested in the action nor a relative or employee
18 of any attorney or any party to this action.

19 IN WITNESS WHEREOF, I have this date
20 subscribed my name.

21 Dated: 03/07/2022

22 
23 _____

24 JOANNA BROADWELL

25 CSR No. 10959

Exhibit B

Status	Date	Timekeeper	Client	Matter	Billed Rate	Hours	Amount	Bill	Billed Hours	Billed Total	Narrative
Posted	09/01/2023	CAP	23641	00001	0	2.5	987.5	0	0	0	Zamrila: Prepare amendment to motion to recover costs.
Billed	08/30/2023	CAP	23641	00001	395	0.8	316	206760	0.8	316	Zamrila: Review court order regarding deeming June 9th order as a Statement of Decision; determine impact on appeal and recovering costs from Zamrila's.
Billed	08/18/2023	TEM	23641	00001	395	1.5	592.5	206760	1.5	592.5	Review status of Zamrila appeal; prepare report to Watermaster board regarding events and timeline of appeal.
Billed	08/17/2023	CAP	23641	00001	395	2.8	1106	206760	2.8	1106	Drafting of introduction to amended motion for monetary relief from Zamrila's.
Billed	08/16/2023	CAP	23641	00001	395	2.5	987.5	206760	2.5	987.5	Review history of motion for monetary relief against the Zamrila's and create timeline.
Billed	08/15/2023	CAP	23641	00001	395	1.5	592.5	206760	1.5	592.5	Work on cost recovery issues from Zamrila--what amount of attorneys fees are recoverable.
Billed	08/11/2023	CAP	23641	00001	395	0.8	316	206760	0.8	316	Zamrila: Review draft order of June 9th, and consider submitting competing order.
Billed	08/11/2023	TEM	23641	00001	395	2.3	908.5	206760	2.3	908.5	Review Zamrila's proposed order denying statement of decision; conferences and correspondence regarding same; revise proposed alternate order; continue preparation of index to appeal appendix.
Billed	08/08/2023	TEM	23641	00001	395	1.9	750.5	206760	1.9	750.5	Review Zamrila's desipation of the record for appeal; prepare docket regarding pleadings to be included in same; legal research regarding requirements for respondent's appendix.
Billed	08/02/2023	CAP	23641	00001	395	2.5	987.5	206760	1.2	474	Work on collection issues as to interest and attorneys fees recoverable from Zamrila's.
Billed	08/02/2023	TEM	23641	00001	395	3.3	1303.5	206760	2	790	Conferences and correspondence regarding protection of record for Zamrila appeal; legal research regarding same; prepare alternate proposed order denying motion regarding statement of decision; conferences regarding same; review court's informal order regarding same; correspondence regarding same.
Billed	08/01/2023	CAP	23641	00001	395	5.5	2172.5	206760	3.5	1382.5	Correspondence with counsel regarding hearing today on Statement of Decision by Court in Zamrila; prepare for that critical hearing and attend the same on behalf of the Watermaster; prepare report for client on results; review Court's final decision.
Paid	08/01/2023	CG	23641	00001	350	0.8	280	206760	0	0	Attend hearing on Zamrila appeal and statement of decision; strategy with counsel for Settling Parties.
Paid	07/31/2023	CAP	23641	00001	395	4.5	1777.5	206099	4.5	1777.5	Prepare for court hearing on Zamrila's motion to set aside Judgment and draft order denying their motion and converting order to a Statement of Decision.
Paid	07/31/2023	CG	23641	00001	350	0.5	175	206099	0.5	175	Strategy meeting with co-counsel regarding Zamrila appeal, statement of decision, etc.
Paid	07/31/2023	TEM	23641	00001	395	1.7	671.5	206099	1.7	671.5	Conferences and correspondence regarding hearing on objections to statement of decision for Zamrila order; review and revise proposed order on objections.
Paid	07/28/2023	CAP	23641	00001	395	3.5	1382.5	206099	3.5	1382.5	Work in response to Zamrila's new position on the appeal they filed and formulate response to Zamrila's objections to the hearing they filed requested.
Paid	07/28/2023	TEM	23641	00001	395	4.2	1659	206099	4.2	1659	Continue legal research regarding Zamrila's objections; prepare memorandum regarding same; emails and conferences regarding decision issues.
Paid	07/27/2023	TEM	23641	00001	395	2.9	1145.5	206099	2.9	1145.5	Legal research regarding appeal issues for Zamrila order; conference regarding same; prepare memo regarding statement to decision issues.
Paid	07/27/2023	CAP	23641	00001	395	3.5	1382.5	206099	3.5	1382.5	Review Zamrila's objections to hearing on Statement of Decision; discussion with Settling Parties' counsel.
Paid	07/26/2023	TEM	23641	00001	395	2.4	948	206099	2.4	948	Review Zamrila's objections to order; conference and correspondence regarding same; legal research regarding same.
Paid	07/14/2023	TEM	23641	00001	395	0.6	237	206099	0.6	237	Conferences and correspondence regarding Zamrila's appeal.
Paid	07/11/2023	CAP	23641	00001	395	4.5	1777.5	206099	4.5	1777.5	Review and comment on Zamrila's objections to Statement of Decision and work on draft reply to those objections.
Paid	07/10/2023	TEM	23641	00001	395	2.4	948	206099	2.4	948	Review request to deem order a statement of decision, the Zamrila's objections thereto, and the Zamrila's notice of intent to object to statement of decision; legal research regarding same; conferences and emails regarding same.
Paid	07/10/2023	CG	23641	00001	350	0.3	105	206099	0.3	105	Strategy regarding reply to Zamrila's objections to request for statement of decision.
Paid	07/07/2023	CG	23641	00001	350	0.4	140	206099	0.4	140	Review Zamrila objections to Statement of Decision.
Paid	07/06/2023	CAP	23641	00001	395	3.5	1382.5	206099	3.5	1382.5	Review objections filed by Zamrila's Order and prepare strategy for Reply.
Paid	06/15/2023	CAP	23641	00001	395	2	790	205421	2	790	Work on Statement of Decision issues and review order that is deemed Statement of Decision in Zamrila; prepare for closed session on Zamrila matter.
Paid	06/13/2023	CAP	23641	00001	395	2.5	987.5	205421	2.5	987.5	Finalize research on letter to Zamrila's counsel regarding payment of fees and costs to Watermaster.
Paid	06/12/2023	CAP	23641	00001	395	3.5	1382.5	205421	1.5	592.5	Research fee entitlement for Watermaster from Zamrila parties; draft attorney regarding fee recovery to Zamrila lawyers.
Paid	06/12/2023	TEM	23641	00001	395	0.4	158	205421	0.4	158	Correspondence with Zamrila's regarding post-order proceedings; conference regarding same.
Paid	06/11/2023	CAP	23641	00001	395	4.5	1777.5	205421	2.8	1106	Review trial transcript in Zamrila to begin research on fees and costs we might obtain from prevailing at trial; draft letter to counsel for Zamrila regarding attorneys fees his clients might be found to pay on behalf of the Watermaster.
Paid	06/08/2023	TEM	23641	00001	395	1	395	205421	1	395	Conference regarding post-judgment issues in Zamrila matter; legal research regarding same.
Paid	06/01/2023	CAP	23641	00001	395	1.5	592.5	205421	2.5	987.5	Review Judge Komar's 16-page decision denying the Zamrila's motions to set aside the Judgment; transmit decision to Board; discuss tulling of Court on Zamrila with several attorneys for Settling Parties.
Paid	05/29/2023	CAP	23641	00001	395	1.5	592.5	204701	1.5	592.5	Review proposed order and edit the same and consider submitting it to Court as draft order for court to consider to deny the Zamrila's motion to set aside the Judgment.
Paid	05/26/2023	CG	23641	00001	350	0.4	140	204701	0.4	140	Review Zamrila replies to oppositions to motions to set aside or modify Judgment.
Paid	05/19/2023	CG	23641	00001	350	3.5	1225	204701	2.7	945	Proposed Order regarding Zamrila motions to set aside Judgment.
Paid	05/19/2023	CAP	23641	00001	395	1.5	592.5	204701	1.5	592.5	Work on Statement of Decision and draft of Proposed Order in Zamrila case.
Paid	05/12/2023	CG	23641	00001	350	0.3	105	204701	0.3	105	Closing brief in opposition to Zamrila's motion to set aside Judgment.
Paid	05/11/2023	CG	23641	00001	350	0.8	280	204701	0.8	280	Finalize closing brief in opposition to Zamrila's motions to set aside Judgment.
Paid	05/10/2023	CG	23641	00001	350	1.6	560	204701	1.6	560	Finalize closing brief in opposition to Zamrila's motions to set aside Judgment.
Paid	05/09/2023	CAP	23641	00001	395	6.5	2567.5	204701	1.5	592.5	Edit and amend brief as to other Zamrila parties and review draft brief done by Settling Parties including Public Water Suppliers.
Paid	05/09/2023	CG	23641	00001	350	3.7	1295	204701	2.7	945	Edit closing briefs in opposition to Zamrila's motions to set aside Judgment.
Paid	05/08/2023	CAP	23641	00001	395	6.8	2686	204701	1.8	711	Edit and amend closing brief as to two of the Zamrila parties and check legal citations; calls with staff regarding board agenda and closed session content.
Paid	05/05/2023	CAP	23641	00001	395	3.5	1382.5	204701	3.5	1382.5	Edit and amend brief to court on legal position of Johnny Zamrila Jr. and spouse.
Paid	05/04/2023	CG	23641	00001	350	1	350	204701	0	0	Closing brief in opposition to Zamrila motion to set aside or modify Judgment.
Paid	05/04/2023	CAP	23641	00001	395	3.5	1382.5	204701	1.5	592.5	Edit and amend closing brief as to Johnny and Pamela Zamrila per court order.
Paid	05/03/2023	CG	23641	00001	350	4.6	1610	204701	2.6	910	Draft closing brief in opposition to Zamrila motion to set aside or modify Judgment.
Paid	05/02/2023	CG	23641	00001	350	5.7	1995	204701	3.7	1285	Draft closing brief in opposition to Zamrila motion to set aside or modify Judgment.
Paid	05/01/2023	CAP	23641	00001	395	2.5	987.5	204701	2.5	987.5	Review closing briefs of Zamrila's and amend responsive outline.
Paid	05/01/2023	CG	23641	00001	350	6	2100	204701	3	1050	Draft opposing closing brief in Zamrila motions to modify or set aside Judgment.
Paid	04/28/2023	CAP	23641	00001	395	2.5	987.5	203996	2.5	987.5	Work on closing brief required by court in Zamrila; review trial court record.
Paid	04/25/2023	CG	23641	00001	350	0.9	315	203996	0.9	315	Closing brief of closing briefs by Zamrila parties.
Paid	04/14/2023	CAP	23641	00001	395	3	1185	203996	2	790	Review first of closing briefs by Zamrila parties.
Paid	04/12/2023	CG	23641	00001	350	0.2	70	203996	0.2	70	Analysis and advice regarding response to Zamrila Public Records Act request.

Paid	04/12/2023	CG	23641	00001	350	1	350	203996	1	350	203996	350	Prepare for opposition to Zamriza dosing briefs.
Paid	04/11/2023	CG	23641	00001	350	0.3	105	203996	0.3	105	203996	105	Advice and analysis regarding Zamriza public records request for fee agreement.
Paid	03/17/2023	CAP	23641	00001	395	7	2765	203996	4.5	1777.5	203996	1777.5	Return to office from trial; finalize memorandum to board regarding Zamriza trial.
Paid	03/16/2023	CG	23641	00001	350	0.5	175	203283	0	175	203283	0	0 Prepare for hearing on Zamriza's motions to set aside Judgment.
Paid	03/16/2023	CG	23641	00001	350	5	1750	203283	3.5	1225	203283	1225	Attend Day 2 hearing by zoom on Zamriza's motions to set aside Judgment.
Paid	03/15/2023	CG	23641	00001	350	5.5	1925	203283	5.5	1925	203283	1925	Attend Day 1 of Zamriza hearing by Zoom on motion to set aside Judgment.
Paid	03/15/2023	CAP	23641	00001	395	9.5	3752.5	203283	9.5	3752.5	203283	3752.5	0 Prepare for and attend and participate in day one of Zamriza trial; prepare for day two.
Paid	03/15/2023	CG	23641	00001	350	0.6	210	203283	0	210	203283	0	0 Prepare for hearing on Zamriza motions to set aside Judgment.
Paid	03/14/2023	CG	23641	00001	350	1.6	580	203283	1.6	580	203283	580	0 Prepare for Zamriza motion to set aside Judgment.
Paid	03/14/2023	CAP	23641	00001	395	9.5	3752.5	203283	5.5	2172.5	203283	2172.5	Prepare for trial in Zamriza; discuss trial with trial counsel; meet with counsel in San Jose to discuss trial. Finalize examination of Pamela and Johnny Lee Zamriza.
Paid	03/13/2023	CG	23641	00001	350	2.5	875	203283	2.5	875	203283	875	Prepare for hearing on Zamriza motions to set aside Judgment.
Paid	03/12/2023	CAP	23641	00001	395	5	1975	203283	3	1165	203283	1165	Trial preparation in Zamriza--edit examinations of Zamriza parties, prepare opening statement.
Paid	03/11/2023	CAP	23641	00001	395	5.5	2172.5	203283	4.5	1777.5	203283	1777.5	Trial preparation by reviewing deposition transcripts of Zamriza and finalizing exhibits for trial--and reviewing 126 exhibits of Zamriza.
Paid	03/10/2023	CAP	23641	00001	395	5.6	2212	203283	3.5	1382.5	203283	1382.5	Preparation for Zamriza trial--finalize trial brief and work on examination of Zamriza parties; discussions with representatives of Public Water Suppliers as well as representatives of overlying Ex. 4 parties and others. Engage in extensive trial discussions.
Paid	03/10/2023	CG	23641	00001	350	0.4	140	203283	0.4	140	203283	140	Prepare for hearing on Zamriza motion to set aside Judgment.
Paid	03/09/2023	CG	23641	00001	350	2.8	980	203283	2.8	980	203283	980	Prepare for hearing on Zamriza motion to set aside Judgment.
Paid	03/08/2023	CG	23641	00001	350	4.1	1435	203283	2.2	770	203283	770	Prepare for hearing on Zamriza motion to set aside Judgment.
Paid	03/08/2023	CAP	23641	00001	395	6.5	2567.5	203283	4	1580	203283	1580	Prepare cross-examination of Zamriza witnesses; edit and amend Watermaster Trial Brief; prepare evidence for trial.
Paid	03/07/2023	CG	23641	00001	350	0.2	70	203283	0.2	70	203283	70	Prepare for hearing on Zamriza motion to set aside Judgment.
Paid	03/04/2023	CAP	23641	00001	395	4.5	1777.5	203283	3.5	1382.5	203283	1382.5	Review Watermaster's motion to enforce judgment as to Zamriza and review evidence.
Paid	03/02/2023	CG	23641	00001	350	0.5	175	203283	0	175	203283	0	0 Prepare for hearing on Zamriza motion to set aside Judgment.
Paid	03/01/2023	CAP	23641	00001	395	2	790	203283	1.5	592.5	203283	592.5	Prepare for Zamriza trial by assembling exhibits and preparing cross-examination.
Paid	03/01/2023	CG	23641	00001	350	0.7	245	203283	0.7	245	203283	245	Prepare for hearing on Zamriza motion to set aside Judgment.
Paid	02/28/2023	CG	23641	00001	350	1	350	202612	1	350	202612	350	Prepare for hearing on Zamriza motion to set aside Judgment; meeting with Settling Parties regarding same.
Paid	02/23/2023	CAP	23641	00001	395	3.5	1382.5	202612	1.5	592.5	202612	592.5	Prepare examination of Johnny Zamriza for trial.
Paid	02/22/2023	CG	23641	00001	350	0.6	210	202612	0.6	210	202612	210	Prepare for hearing on Zamriza motion.
Paid	02/21/2023	CG	23641	00001	350	0.9	315	202612	0.9	315	202612	315	Prepare for hearing on Zamriza motion.
Paid	02/20/2023	CAP	23641	00001	395	2.5	987.5	202612	2.5	987.5	202612	987.5	Prepare and edit and amend draft exhibit list for Zamriza trial.
Paid	02/17/2023	CG	23641	00001	350	0.3	105	202612	0.3	105	202612	105	Prepare for Zamriza hearing to set aside Judgment.
Paid	02/15/2023	CAP	23641	00001	395	5.5	2172.5	202612	2.8	1106	202612	1106	General trial preparation for hearing on February 17th covering two matters; preparation for March 15-16 trial of Zamriza's motion to set aside Judgment.
Paid	02/15/2023	CG	23641	00001	350	0.1	35	202612	0	35	202612	0	0 Prepare for hearing on Zamriza motion to set aside Judgment.
Paid	02/09/2023	CAP	23641	00001	395	0.8	316	202612	0.8	316	202612	316	Review and edit Stipulation and Order concerning Zamriza trial in March.
Paid	02/08/2023	CAP	23641	00001	395	4.5	1777.5	202612	1.5	592.5	202612	592.5	Review edits to trial stipulation with Zamriza parties; call with counsel for Response and respond to inquiry from staff regarding Response; finalize memos to Board.
Paid	02/08/2023	CG	23641	00001	350	0.1	35	202612	0	35	202612	0	0 Zamriza motion to set aside Judgment.
Paid	02/03/2023	CG	23641	00001	350	0.3	105	202612	0.3	105	202612	105	Zamriza motion to set aside Judgment; meet and confer with opposing counsel.
Paid	02/02/2023	CG	23641	00001	350	0.2	70	202612	0.2	70	202612	70	Work on Zamriza motion to set aside Judgment.
Paid	02/01/2023	CAP	23641	00001	395	2.8	1106	202612	1.5	592.5	202612	592.5	0 Prepare for and participate in call with Zamriza's counsel regarding adopting a scheduling order.; revise Stipulation and Order regarding trial parameters in Zamriza hearing.
Paid	02/01/2023	CG	23641	00001	350	1.3	455	202612	1.3	455	202612	455	Meet and confer with Zamriza counsel regarding motion to set aside Judgment.
Paid	01/31/2023	CG	23641	00001	270	0.2	70	201951	0.2	70	201951	54	Prepare for meet and confer with Zamriza counsel regarding hearing on motions.
Paid	01/26/2023	CG	23641	00001	270	1.8	630	201951	1.8	630	201951	468	Zamriza hearing preparation; meeting with Settling Parties regarding same; meet and confer with opposing counsel regarding same.
Paid	01/26/2023	CAP	23641	00001	395	4.5	1777.5	201951	4.5	1777.5	201951	1777.5	Work with group of Settling Parties counsel on stipulation for conduct of evidentiary hearing in Zamriza case; edit Stipulation and Order regarding Zamriza hearing.
Paid	01/20/2023	CG	23641	00001	270	2.1	735	201951	2.1	735	201951	567	Participation in Zamriza meet and confer, prepare for hearing on motions.
Paid	01/18/2023	CG	23641	00001	270	1.4	490	201951	1.4	490	201951	378	Zamriza motions meet and confer process, prepare for hearing.
Paid	01/19/2023	CG	23641	00001	270	0.8	280	201951	0.8	280	201951	218	Meet & Confer regarding Zamriza motion to set aside Judgment; coordination with Settling Parties' counsel regarding same.
Paid	01/11/2023	CAP	23641	00001	395	4.5	1777.5	201951	1.5	592.5	201951	592.5	Prepare for call with parties participating in Zamriza trial; lead discussion with counsel on Zamriza trial.
Paid	01/11/2023	CG	23641	00001	270	0.7	245	201951	0.7	245	201951	189	Meet and confer regarding Zamriza motion to set aside Judgment.
Paid	01/05/2023	CAP	23641	00001	395	2.5	987.5	201951	1.5	592.5	201951	592.5	Prepare for interview of testifying witness in Zamriza hearing and interview the same.
Paid	01/04/2023	CG	23641	00001	270	0.3	105	201951	0.3	105	201951	81	Review Zamriza Motion to set aside Judgment.
Paid	01/03/2023	CG	23641	00001	270	0.2	70	201951	0.2	70	201951	54	Research regarding Zamriza motion to set aside Judgment.
Paid	12/16/2022	CAP	23641	00001	395	3.5	1382.5	201251	3.5	1382.5	201251	1382.5	Work on Zamriza trial preparation for evidentiary hearing; organize exhibits for same.
Paid	12/14/2022	CG	23641	00001	270	0.2	54	201251	0.2	54	201251	54	Review Zamriza motion to set aside Judgment.
Paid	12/09/2022	CG	23641	00001	270	1	270	201251	1	270	201251	270	Prepare for hearing on Zamriza motion to set aside Judgment; legal research regarding arguments in opposition to motion; document motions.
Paid	11/28/2022	CG	23641	00001	270	0.2	54	200531	0.2	54	200531	54	Negotiations with Zamriza counsel regarding procedures for hearings.
Paid	11/27/2022	CG	23641	00001	270	0.4	108	200531	0.4	108	200531	108	Negotiations with Zamriza counsel regarding hearings on motions.
Paid	11/25/2022	CG	23641	00001	270	0.2	54	200531	0.2	54	200531	54	Negotiations with Zamriza counsel regarding hearings on motions.
Paid	11/23/2022	CG	23641	00001	270	1.4	378	200531	1.4	378	200531	378	Hearing logistics regarding Zamriza motions; discussions with Settling Parties, opposing counsel.
Paid	11/23/2022	CAP	23641	00001	395	2	790	200531	2	790	200531	790	Review edits of Zamriza's counsel (now they have 2 law firms representing them) about proposed changes to the evidentiary hearing schedule; zoom call with settling parties counsel regarding schedule.
Paid	11/22/2022	CG	23641	00001	270	0.3	81	200531	0.3	81	200531	81	Negotiations with Zamriza counsel regarding motions; hearings and evidentiary stipulations.
Paid	11/21/2022	CAP	23641	00001	395	3.5	1382.5	200531	2.5	987.5	200531	987.5	Prepare for and participate in discussion with PWS counsel and counsel for overliers about strategy at hearing on Zamriza; edit and amend letter to Zamriza's counsel regarding hearing date and details of trial.
Paid	11/21/2022	CG	23641	00001	270	1.7	459	200531	1.7	459	200531	459	Review opposition to Zamriza motion to set aside Judgment, prepare for hearing

Paid	04/14/2022	CG	23641	00001	270	3.5	945	194898	3.5	945	Opposition to Zamriza motions to set aside Judgment regarding Small Pumper Class status.
Paid	04/13/2022	CAP	23641	00001	395	4.5	1777.5	194898	4.5	1777.5	Prepare for conference call with attorneys filing opposition to Zamriza motion; call with same.
Paid	04/13/2022	CG	23641	00001	270	1.5	405	194898	1.5	405	Opposition to Zamriza motions to set aside Judgment.
Paid	04/12/2022	CAP	23641	00001	395	3.5	1382.5	194898	3.5	1382.5	Review voluminous documents produced by Zamriza's new counsel for evidentiary hearing.
Paid	04/12/2022	CG	23641	00001	270	0.6	162	194898	0.6	162	Opposition to Zamriza motion to set aside Judgment.
Paid	04/12/2022	CAP	23641	00001	395	2.5	987.5	194898	2.5	987.5	Review Zamriza's motion to elude court jurisdiction.
Paid	04/11/2022	CG	23641	00001	270	0.9	243	194898	0.9	243	Opposition to Zamriza motion regarding Jurisdiction and small pumper class status.
Paid	04/07/2022	CAP	23641	00001	395	2.6	1027	194898	2.6	1027	Opposition to Zamriza motion regarding Jurisdiction and small pumper class status.
Paid	04/07/2022	CG	23641	00001	270	0.5	135	194898	0.5	135	Review Long Valley motion and Court decision and integrate same into Zamriza Court hearing presentation.
Paid	04/04/2022	CAP	23641	00001	395	2.5	987.5	194898	2.5	987.5	Prepare for opposition to Zamriza motion to challenge small pumper class status.
Paid	04/04/2022	CG	23641	00001	270	0.5	135	194898	0.5	135	Prepare for opposition to Zamriza motion to prove-up small pumper class status.
Paid	04/01/2022	CG	23641	00001	270	0.9	243	194898	0.9	243	Zamriza - prepare for opposition to motion to prove-up small pumper class status.
Paid	03/30/2022	CAP	23641	00001	395	3.5	1382.5	194010	3.5	1382.5	Prepare for evidentiary hearing in Zamriza; review Zamriza opposition to our motion and all declarations and prepare cross-examination questions for declarants that we assume Zamriza will attempt to present at evidentiary hearing.
Paid	03/29/2022	CAP	23641	00001	395	3.1	1224.5	194010	3.1	1224.5	Prepare opposition to Zamriza's motion claiming Court has no jurisdiction over them.
Paid	03/07/2022	CG	23641	00001	270	1.1	297	194010	1.1	297	Zamriza - prepare for opposition to motion to establish Small Pumper Class status; telephone call with Mr. Perton and John Calandri regarding same.
Paid	03/04/2022	CG	23641	00001	270	2	540	194010	2	540	Zamriza - prepare for and attend Zamriza motion hearing; prepare for opposition to Small Pumper Class motion.
Paid	03/04/2022	TEM	23641	00001	395	0.3	118.5	194010	0	0	Conference regarding Zamriza hearing and future handling
Paid	03/03/2022	CG	23641	00001	270	1	270	194010	1	270	Zamriza settlement negotiations, responses to proposed orders from Zamriza counsel and Landowner Counsel.
Paid	03/03/2022	CAP	23641	00001	395	4.5	1777.5	194010	2.5	987.5	Prepare objections to Zamriza's proposed Order; prepare for hearing with Judge Komar; conference with landowner counsel and review of alternate order regarding the Zamriza's
Paid	03/02/2022	CG	23641	00001	270	1.2	324	194010	1.2	324	Prepare and submit Status Report to Court regarding Zamriza settlement negotiations, proposed order.
Paid	03/01/2022	CG	23641	00001	270	0.8	216	194010	0.8	216	Zamriza - review and respond to opposing counsel's edits to Stipulation.
Paid	02/28/2022	CG	23641	00001	270	0.4	108	193183	0.4	108	Zamriza - settlement negotiations and litigation strategy.
Paid	02/24/2022	CG	23641	00001	270	1.2	324	193183	1.2	324	Zamriza - discussions with counsel for SCI regarding Small Pumper Class status; draft proposed order after hearing on motion.
Paid	02/18/2022	CG	23641	00001	270	1	270	193183	1	270	Prepare for and attend hearing on Zamriza motion; prepare revisions to Stipulation per Court's direction at hearing.
Paid	02/17/2022	CG	23641	00001	270	0.2	54	193183	0	0	Zamriza settlement negotiations.
Paid	02/15/2022	CG	23641	00001	270	0.5	135	193183	0.5	135	Finalize status update to court regarding Zamriza settlement update; discussion with Watermaster Engineer regarding same.
Paid	02/14/2022	CG	23641	00001	270	1	270	193183	1	270	Draft status update to Court regarding Zamriza settlement negotiations.
Paid	02/11/2022	CAP	23641	00001	395	1.8	711	193183	1.8	711	Edit Case Management Conference statement to court; draft response to Zamriza's brief.
Paid	02/09/2022	CAP	23641	00001	395	2.5	987.5	193183	2.5	987.5	Work on drafting of revised settlement agreement in Zamriza; draft status update for Judge Komar in Zamriza.
Paid	02/08/2022	CG	23641	00001	270	1.4	378	193183	1.4	378	Settlement negotiations with Zamriza counsel; draft revisions to Stipulation for settlement regarding same.
Paid	02/07/2022	CAP	23641	00001	395	0.8	316	193183	0.8	316	Review responses to enforcement letters; correspondence with Zamriza's counsel for settlement.
Paid	02/04/2022	CG	23641	00001	270	0.3	81	193183	0.3	81	Zamriza - settlement negotiations, prepare for upcoming hearing.
Paid	01/24/2022	CAP	23641	00001	395	2.5	987.5	192203	2.5	987.5	Work on preparation for court hearing on Zamriza and review correspondence from their counsel.
Paid	01/19/2022	CAP	23641	00001	395	1.5	592.5	192203	1.5	592.5	Draft status report on Zamriza motion for Court.
Paid	01/14/2022	CAP	23641	00001	395	2.5	987.5	192203	2.5	987.5	Edit and amend stipulated settlement with Zamriza's counsel.
Paid	01/14/2022	TEM	23641	00001	395	0.6	237	192203	0.6	237	Review and revise stipulated settlement with Zamriza's counsel.
Paid	01/13/2022	TEM	23641	00001	395	0.5	197.5	192203	0.5	197.5	Prepare stipulation regarding settlement of Zamriza matter.
Paid	01/12/2022	CG	23641	00001	270	1.7	459	192203	1.7	459	Zamriza - draft Stipulation for settlement.
Paid	01/12/2022	CG	23641	00001	395	2.5	987.5	192203	2.5	987.5	Prepare for and engage in discussions with counsel for Zamriza per Court's December 10th Order; prepare stipulation.
Paid	01/06/2022	CAP	23641	00001	270	0.7	189	192203	0.7	189	Zamriza - review hearing transcript, discuss settlement options with opposing counsel, draft same.
Paid	01/06/2022	CG	23641	00001	270	0.7	189	192203	0.7	189	Zamriza - review hearing transcript, discuss settlement options with opposing counsel, draft same.
Paid	12/01/2021	TEM	23641	00001	395	2.5	987.5	190695	2.5	987.5	Prepare reply brief for Zamriza's motion; conferences regarding same.
Paid	12/01/2021	CG	23641	00001	270	3.3	891	190695	3.3	891	Zamriza - prepare reply brief; correspondence with Small Pumper Class Counsel regarding same.
Paid	11/29/2021	CG	23641	00001	270	3	810	189750	3	810	Zamriza - prepare for hearing with Judge Komar regarding evidentiary hearing, draft reply to opposition.
Paid	11/16/2021	CG	23641	00001	395	2.5	987.5	189750	2.5	987.5	Review Zamriza opposition declarations and outline response.
Paid	11/16/2021	CG	23641	00001	270	0.5	135	189750	0.5	135	Zamriza - review opposition to Motion for collection of RWAs; generate reply thereto, correspondence with Watermaster Engineer regarding same.
Paid	11/15/2021	CG	23641	00001	270	0.4	108	189750	0.4	108	Review Zamriza opposition to RWA motion.
Paid	11/04/2021	CAP	23641	00001	395	3.8	1501	189750	2.8	1106	Multiple communications with attorney for Zamriza who is seeking continuance of hearing; respond to each; correspond with Court regarding continuing the hearing date on Zamriza due to health issues with Brumfield's clients.
Grand Totals:						481.5	\$178,701.00			\$144,350.00	

Grand Totals:

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF SANTA BARBARA

I am employed in the County of Santa Barbara, State of California. I am over the age of eighteen (18) and not a party to the within action. My business address is 200 East Carrillo Street, Fourth Floor, Santa Barbara, California 93101.

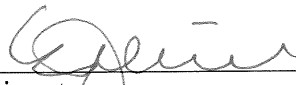
On October 11, 2023, I served the foregoing document described **WATERMASTER'S REVIEWED MOTION FOR MONETARY, DECLARATORY AND INJUNCTIVE RELIEF AGAINST ZAMRZLAS; REQUEST TO SET HEARING; DECLARATION OF CRAIG A. PARTON; EXHIBITS A & B** on all interested parties in this action by placing the original and/or true copy.

☒ **BY ELECTRONIC SERVICE:** I posted the document(s) listed above to the Santa Clara County Superior Court Website @ www.scefilings.org and Glotrans website in the action of the Antelope Valley Groundwater Cases.

☒ (*STATE*) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

☐ (*FEDERAL*) I hereby certify that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.

Executed on October 11, 2023, at Santa Barbara, California.



Signature
Elizabeth Wright