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Government Code § 6103

7 Attorneys for
8 Antelope Valley Watermaster

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

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

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

16
17
18
19 **AND ALL RELATED ACTIONS**

Judicial Council Coordination
Proceeding No. 4408

LASC Case No.: BC 325201

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

**WATERMASTER'S OPPOSITION TO
ZAMRZLAS' MOTION TO STAY
PROCEEDINGS AGAINST THEM
PENDING APPEAL; EXHIBITS A & B**

Date: November 17, 2023
Time: 9:00 a.m.
Dept.: Court Call

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22 The Antelope Valley Watermaster ("Watermaster") hereby opposes the Zamrzlas' Motion
23 to Stay Proceedings Against Them Pending Appeal as follows:
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1 **I. INTRODUCTION**

2 This motion constitutes yet another attempt by the Zamrzlas to avoid their obligations
3 under the Judgment to pay Replacement Water Assessments (“RWAs”) for the water they
4 extracted in 2018 and to install flow meters on their wells to measure their pumping. When in
5 September 29, 2021 the Watermaster filed a motion to compel the Zamrzlas to comply with these
6 obligations, the Zamrzlas responded by filing a motion to set aside the Judgment; they further
7 demanded that their motion be adjudicated before the Watermaster’s motion was heard. Although
8 their motion was unsuccessful, the Zamrzlas succeeded in delaying the enforcement of the
9 Judgment for two years, during which time they have continued to extract water from the Basin
10 without metering and without paying RWAs.

11 After the Court denied the Zamrzlas’ attack on the Judgment, the Watermaster renewed its
12 motion to compel the Zamrzlas to install flow meters and to pay RWAs for the water they have
13 admittedly extracted (“Renewed Motion”). The Renewed Motion is currently scheduled to be
14 heard on November 17, 2023. As before, the Zamrzlas have responded by filing a counter-
15 motion, this time seeking to stay enforcement of the Judgment on the ground that they have filed
16 an appeal of the Court’s June 9, 2023 order (“Order”) denying their motion to set aside the
17 Judgment.

18 The Zamrzlas’ request for a stay is meritless and should be denied. Contrary to the
19 Zamrzlas’ motion, their appeal of the Order does not stay enforcement of the Judgment. It is well
20 established that the appeal of a post-judgment order denying a motion to set aside or vacate a
21 judgment does not stay the enforcement of the underlying judgment. In this case, the Zamrzlas
22 are not appealing the Judgment; they are only appealing the Order denying their motion to set
23 aside the Judgment. As a matter of law, the Judgment is not stayed by the Zamrzlas’ appeal of the
24 Order.

25 The Zamrzlas have also failed to identify any persuasive grounds for the issuance of a
26 discretionary stay. The Watermaster has already indicated in its moving papers that it will
27 forebear from enforcing the monetary component of the order requested in the Renewed Motion.
28 The Zamrzlas consequently are unable to identify any unfair prejudice resulting from the Court

1 ruling on the Renewed Motion. In contrast, the Watermaster will be unfairly prejudiced if the
2 Court delays ruling on the Renewed Motion until after the appeal of the Order is completed. If
3 the appeal of the Order is unsuccessful, and the Court then proceeds to rule on the Renewed
4 Motion, the Zamrzlas will be able to appeal that ruling, causing a second very considerable delay
5 (approximately eighteen months on average for each appeal) in the enforcement of the Judgment.

6 **II. THE JUDGMENT IS NOT AUTOMATICALLY STAYED BY THE**
7 **ZAMRZLAS' APPEAL OF THE ORDER DENYING THEIR MOTION TO**
8 **VACATE**

9 The Zamrzlas' first argument in support of the requested stay is that their appeal of the
10 Order denying their motion automatically stays the enforcement of the Judgment. This is legally
11 incorrect. "If an appeal is taken from an order after final judgment [citation] but not from the
12 judgment itself, a stay of the appealed order does not stay the underlying judgment [citation]."
13 (*People v. American Surety Co.* (2019) 31 Cal.App.5th 380, 393; see also *Miller v. Gross* (1975)
14 48 Cal.App.3d 608, 612-613 [appeal from denial of motion to vacate judgment did not stay
15 enforcement of the underlying judgment]; Eisenberg et al., *Cal. Practice Guide: Civil Appeals*
16 *and Writs* (The Rutter Group 2022) ¶7.269 p. 7-77.)

17 In this case, the Zamrzlas have only appealed the Order denying their motion to set aside the
18 Judgment. They have not appealed the Judgment itself. Because the appeal of a post-judgment
19 order does not stay enforcement of the underlying judgment, the Zamrzlas' appeal of the Order does
20 not affect the enforceability of the Judgment. The Court instead is fully empowered to grant the
21 relief requested in the Watermaster's Renewed Motion.

22 The Zamrzlas' motion for stay makes no attempt to dispute or distinguish the above
23 authorities holding that the appeal of a post-judgment order does not stay the enforcement of the
24 underlying appeal. The Zamrzlas instead simply cite a century-old case, *In re Estate of Waters*,
25 (1919) 181 Cal. 584, for the general proposition that the filing of an appeal divests the trial court
26 of jurisdiction. (Motion at pp. 3-4.) *In re Estate of Waters* did not address the issue presented
27 here and does not support the Zamrzlas' position.¹

28 ¹*In re Estate of Waters* instead holds that "where . . . a separate appeal from an order on a
motion for a new trial is authorized, the perfection of an appeal from the judgment or order in the

1 **III. THE COURT SHOULD DENY THE ZAMRZLA'S REQUEST FOR A**
2 **DISCRETIONARY STAY**

3 Implicitly recognizing that their appeal of the Order does not automatically stay the
4 Judgment, the Zamrzlas proceed to request that the Court issue a discretionary stay of the
5 Judgment during the pendency of their appeal. The Court should deny this request (1) because
6 staying enforcement of the Judgment would unfairly prejudice the Watermaster, and (2) because
7 the Zamrzlas have not shown that they will suffer any unfair prejudice in the absence of the
8 requested stay.

9 **1. The Requested Stay Would Unfairly Prejudice The Watermaster**

10 The Watermaster will suffer unfair prejudice if the Court grants the requested stay because
11 it will enable the Zamrzlas to sequentially appeal the Order denying their motion to set aside the
12 Judgment, which they are doing now, and then, approximately eighteen months later, when that
13 appeal is finally completed, file a separate appeal of the Court's ruling on the Renewed Motion,
14 causing a second approximately eighteen-month delay while the second appeal is being heard. In
15 contrast, if the Court denies the requested stay and rules immediately on the Watermaster's
16 Renewed Motion, any appeal of that order by the Zamrzlas can be consolidated with the
17 Zamrzlas' current appeal, which has not yet progressed to the briefing stage. The court of appeal
18 could then review both rulings at the same time (though of course the appellate court will not
19 review the ruling on the Renewed Motion if it reverses the Order). Appellate review of both
20 orders at the same would be more economical and would save considerable time. If both orders
21 (the Order denying the Zamrzlas' motion to set aside the judgment and the order on the Renewed
22 Motion) are appealed at the same time, the total time for appellate review will be approximately
23 eighteen months. On the other hand, if the Court grants the requested stay and does not rule on
24 the Renewed Motion until the completion of the Zamrzlas' current appeal, the total period for
25 appellate review will be approximately thirty-six months, because Zamrzlas will be able to

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27 main proceeding does not divest the court of jurisdiction to hear and determine the motion." (*Id.*
28 at p. 587.) This holding underscores the fact that in many circumstances the appeal of a judgment
or order will not stay proceedings relating to a different order.

1 separately appeal the ruling on the Renewed Motion after the completion of the first appeal. This
2 is an unacceptable delay which can easily be avoided by proceeding with a ruling on the Renewed
3 Motion, thereby compelling the Zamrzlas to pursue any appeal of that ruling at the same time as
4 their appeal of the Order denying their motion to set aside the Judgment.

5 **2. The Zamrzlas Will Not Be Unfairly Prejudiced If the Court Grants the**
6 **Renewed Motion**

7 In contrast to the clear prejudice that will be suffered by the Watermaster if the Renewed
8 Motion is stayed, the Zamrzlas are unable to demonstrate any unfair prejudice to them if the
9 requested stay is denied.

10 As the Zamrzlas' acknowledge, the Watermaster has stated in its Renewed Motion that it
11 will not enforce the monetary component of the order it seeks against the Zamrzlas. The Zamrzlas
12 nevertheless argue, however, that allowing the Watermaster's Renewed Motion to go forward will
13 cause them to incur attorney fees in connection with discovery related to the Renewed Motion.
14 This assertion is meritless. The Watermaster's Renewed Motion seeks RWAs based solely on the
15 Zamrzlas' self-reported pumping records which they submitted to the Watermaster. As set forth in
16 Exhibit A to the declaration of Patricia Rose in support of the Watermaster Motion, the Zamrzlas
17 submitted documentation to the Watermaster dated March 18, 2019, stating that they had pumped
18 cumulatively 93.75 acre-feet (AF) of water from their properties in 2018--75.29 AF from the J&P
19 property, and 18.46 AF from the J&J property.

20 The Watermaster's Renewed Motion seeks to recover the past-due RWAs for 2018 based
21 solely on these self-reported numbers. The Zamrzlas have never disputed these numbers since the
22 Watermaster filed its original Motion on September 29, 2021. Since the Watermaster's motion is
23 based solely on the Zamrzlas' own numbers, there is no need for the Zamrzlas to propound
24 discovery on the Watermaster. Likewise, the Watermaster does not need to propound any
25 discovery on the Zamrzlas, because it has already agreed to accept the Zamrzlas' self-reported
26 numbers.

1 Given the absence of any harm to the Zamrzlas, and the very considerable probability that
2 granting the stay would delay enforcement of the Judgment to the harm of the Watermaster and the
3 Basin, the Court should deny the request for a discretionary stay.

4 **IV. CONCLUSION**

5 For all of the foregoing reasons, the Court should deny the Zamrzlas' motion for stay in its
6 entirety and proceed to rule on the Watermaster's Renewed Motion.

7 Respectfully submitted,

8 Dated: November 3, 2023

PRICE, POSTEL & PARMA LLP

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

1 **DECLARATION OF CRAIG A. PARTON**

2 I, CRAIG A. PARTON, declare as follows:

3 1. I am a partner in the law firm of Price, Postel & Parma LLP (“**PPP**”), counsel of
4 record for Antelope Valley Watermaster (“**Watermaster**”) herein. I have personal knowledge of
5 the matters set forth below and if called as a witness could testify competently thereto.

6 2. I have served as the principal attorney responsible for providing general counsel and
7 litigation services to the Watermaster since November 2017, and I have been intimately involved in
8 the ongoing dispute with the Zamrzlas related to enforcement efforts to collect delinquent RWAs,
9 interest thereon, and costs and fees.

10 3. On March 4, 2022, from 9:00 a.m. – 9:32 a.m., the Court held a remote hearing on
11 the Watermaster Motion. I attended the March 4, 2022 hearing via teleconference. Attached hereto
12 as Exhibit “A” are true and correct copies of excerpts from the transcript of the March 4, 2022
13 hearing on the Watermaster Motion, which excerpts are relevant to the Watermaster’s Renewed
14 Motion and referenced therein.

15 4. Attached hereto as Exhibit “B” is a true and correct copy of our firm’s billing ledger
16 detailing all time entries for fees billed for this matter for the period of time from November 4,
17 2021 through September 1, 2023, which totals \$144,350.00. Additional attorneys’ fees in the
18 amount of \$3,325.00 (5 hours of partner time at \$395 per hour, and 5 hours of associate time at
19 \$270 per hour) are estimated for the period of September 19, 2023 through the time of the hearing
20 on the instant motion. Therefore, the Watermaster seeks a total of **\$147,675.00** in attorneys’ fees
21 related to efforts to collect the Zamrzlas’ RWAs.

22 5. Throughout PPP’s representation of the Watermaster on this matter, the hourly rate
23 billed to the Watermaster reflected PPP’s public agency rates. The public agency rates reflect an
24 approximate 25% to 34% reduction in our customary rates.

25 6. The Zamrzlas could and should have paid the RWAs they owed pursuant to the clear
26 terms of the Judgment rather than delaying the inevitable. The attorneys’ fees incurred by the
27 Watermaster in seeking to recover the RWAs owed by the Zamrzlas were necessary in order to
28 protect against the substantial harm that would be caused to the Basin if the Zamrzlas were allowed

1 to merely ignore their 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 involved 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.

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12 Dated: November 3, 2023 .



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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
BEFORE THE HON. JACK KOMAR
Friday, March 4, 2022

Reported by:
JOANNA BROADWELL
CSR No. 10959
Job No. 5116883

PAGES 1 - 27

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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
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)

)
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.

1 APPEARANCES

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1 Continued Appearances - Page 2)

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1 Continued Appearances - Page 3)

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1 Continued Appearances - Page 4)

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Page 6

1 (Continued Appearances - Page 5)

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1 Continued Appearances - Page 6)

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

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

21 Walker.

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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 COURTCALL 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	Master	Billed Rate	Hours	Amount	Bill	Billed Hours	Billed Total	Narrative
Posted	08/01/2023	CAP	23641	00001	350	2.5	887.5	0	0	0	Zamzra: Prepare amendment to motion to recover costs.
Billed	08/30/2023	CAP	23641	00001	395	0.8	316	206780	0.8	316	Zamzra: Review court order regarding deeming June 9th order as a Statement of Decision; determine impact on appeal and coordinate fees from Zepherian; prepare report to Watermaster board regarding events and timeline of appeal.
Billed	08/18/2023	TEM	23641	00001	395	1.5	592.5	206780	1.5	592.5	Review status of Zamzra appeal; prepare report to Watermaster board regarding events and timeline of appeal.
Billed	08/17/2023	CAP	23641	00001	395	2.5	1105	206780	2.8	1105	Drafting of introduction to amended motion for monetary relief from Zamzra.
Billed	08/16/2023	CAP	23641	00001	395	1.5	592.5	206780	2.5	987.5	987.5 Review history of motion for monetary relief against the Zamzras and create timeline.
Billed	08/15/2023	CAP	23641	00001	395	2.5	987.5	206780	1.5	592.5	Work on cost recovery issues from Zamzra-what amount of attorneys fees are recoverable.
Billed	08/11/2023	CAP	23641	00001	395	0.8	316	206780	0.8	316	Zamzra: Review draft order of June 9th and consider submitting compelling order.
Billed	08/11/2023	TEM	23641	00001	395	2.3	908.5	206780	2.3	908.5	Review Zamzra'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	206780	1.9	750.5	Review Zamzra's designation of the record for appeal; prepare docket regarding pleadings to be included in same; legal research regarding requirements for respondents' appendix.
Billed	08/02/2023	CAP	23641	00001	395	2.5	987.5	206780	1.2	474	Work on collection issues as to interest and attorneys fees recoverable from Zamzras.
Billed	08/02/2023	TEM	23641	00001	395	3.3	1303.5	206780	2	790	Conferences and correspondence regarding protection of record for Zamzra 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	206780	3.5	1382.5	Correspondence with counsel regarding hearing today on Statement of Decision by Court in Zamzra; 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	206780	0	0	Attend hearing on Zamzra 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 Zamzra'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 Zamzra 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 Zamzra 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 on response to Zamzra's new position on the appeal they filed and formulate response to Zamzra's objections to the hearing they in fact requested.
Paid	07/28/2023	TEM	23641	00001	395	4.2	1659	206099	4.2	1659	Continue legal research regarding Zamzra's objections; prepare memorandum regarding same; emails and conferences regarding same.
Paid	07/27/2023	TEM	23641	00001	395	2.9	1145.5	206099	2.9	1145.5	Legal research regarding appeal issues for Zamzra order; conferences 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 Zamzra'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 Zamzra'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 Zamzra's appeal.
Paid	07/11/2023	CAP	23641	00001	395	4.5	1777.5	206099	4.5	1777.5	Review and comment on Zamzra'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 Zamzras' objections thereto, and the Zamzras' 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 Zamzra objections to Statement of Decision.
Paid	07/07/2023	CG	23641	00001	350	0.4	140	206099	0.4	140	140 Strategy regarding reply to Zamzra 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 Zamzra to 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 Zamzra; prepare for closed session on Zamzra matter.
Paid	06/13/2023	CAP	23641	00001	395	2.5	987.5	205421	2.5	987.5	Finalize research on letter to Zamzra'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 Zamzra parties; draft letter regarding fee recovery to Zamzra lawyers.
Paid	06/12/2023	TEM	23641	00001	395	0.4	158	205421	0.4	158	Correspondence with Zamzra's regarding post-order proceedings; conferences regarding same.
Paid	06/11/2023	CAP	23641	00001	395	4.5	1777.5	205421	2.8	1108	Review trial transcript in Zamzra to begin research on fees and costs we might obtain from prevailing at trial; draft letter to counsel for Zamzra regarding attorney fees the client might be bound 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 Zamzra matter; legal research regarding same.
Paid	06/01/2023	CAP	23641	00001	395	1.5	592.5	205421	2.5	987.5	Conferece regarding Court on Zamzra 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 Zamzra's motion to set aside the Judgment.
Paid	05/26/2023	CG	23641	00001	350	0.4	140	204701	0.4	140	Review Zamzra 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 Zamzra 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 Zamzra case.
Paid	05/12/2023	CG	23641	00001	350	0.3	105	204701	0.3	105	Closing brief in opposition to Zamzra'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 Zamzra'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 Zamzra'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 Zamzra 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 Zamzra'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 Zamzra 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 Zamzra, Jr. and spouse.
Paid	05/04/2023	CG	23641	00001	350	1	350	204701	0	0	Closing brief in opposition to Zamzra motion to set aside or modify Judgment.
Paid	05/03/2023	CAP	23641	00001	395	3.5	1382.5	204701	1.5	592.5	Edit and amend closing brief as to Johnny and Pamela Zamzra per court order.
Paid	05/03/2023	CG	23641	00001	350	4.6	1610	204701	2.6	910	Draft closing brief in opposition to Zamzra motion to set aside or modify Judgment.
Paid	05/02/2023	CG	23641	00001	350	5.7	1995	204701	3.7	1295	Draft closing brief in opposition to Zamzra 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 Zamzras and amend responsive outline.
Paid	05/01/2023	CG	23641	00001	350	6	2100	204701	3	1050	Draft opposing closing brief in Zamzra 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 Zamzra; review trial court record.
Paid	04/25/2023	CG	23641	00001	350	0.9	315	203996	0.9	315	Closing briefs regarding Zamzra litigation.
Paid	04/14/2023	CAP	23641	00001	395	3	1185	203996	2	790	Review first of closing briefs by Zamzra parties.
Paid	04/12/2023	CG	23641	00001	350	0.2	70	203996	0.2	70	Analysis and advice regarding response to Zamzra Public Records Act request.

Paid	04/12/2023	CG	23641	00001	350	1	360	203996	1	350	Prepare for opposition to Zamzria closing briefs.
Paid	04/11/2023	CG	23641	00001	350	0.3	105	203996	0.3	105	105 Advice and analysis regarding Zamzria public records request for fee agreement.
Paid	03/17/2023	CAP	23641	00001	395	7	2765	203283	4.5	1777.5	Return to office from trial, finalize memorandum to board regarding Zamzria trial.
Paid	03/16/2023	CG	23641	00001	350	0.5	175	203283	0	0	0 Prepare for hearing on Zamzria motions to set aside judgment.
Paid	03/16/2023	CG	23641	00001	350	5	1750	203283	3.5	1225	Attend Day 2 hearing by Zoom on Zamzria's motions to set aside judgment.
Paid	03/15/2023	CG	23641	00001	350	3.5	1925	203283	5.5	1925	Attend Day 1 of Zamzria hearing by Zoom on motion to set aside judgment.
Paid	03/15/2023	CAP	23641	00001	395	9.5	3762.5	203283	9.5	3762.5	Prepare for and attend and participate in day one of Zamzria trial, prepare for day two.
Paid	03/15/2023	CG	23641	00001	350	0.6	210	203283	0	0	0 Prepare for hearing on Zamzria motions to set aside judgment.
Paid	03/14/2023	CG	23641	00001	350	1.6	560	203283	1.6	560	560 Prepare for Zamzria motion to set aside judgment.
Paid	03/14/2023	CAP	23641	00001	395	9.5	3762.5	203283	5.5	2172.5	Prepare for trial in Zamzria discuss trial with trial counsel, meet with counsel in San Jose to discuss trial, finalize examination of Pamela and Johnny Lee Zamzria.
Paid	03/13/2023	CG	23641	00001	350	2.5	875	203283	2.5	875	Prepare for hearing on Zamzria motions to set aside judgment.
Paid	03/12/2023	CAP	23641	00001	395	5	1975	203283	3	1777.5	Trial preparation in Zamzria-epit examinations of Zamzria parties, prepare opening statement.
Paid	03/11/2023	CAP	23641	00001	395	5.5	2172.5	203283	4.5	1777.5	Trial preparation by reviewing deposition transcripts of Zamzria and finalizing exhibits for trial-and reviewing 126 exhibits of Zamzria's.
Paid	03/10/2023	CAP	23641	00001	395	5.6	2212	203283	3.5	1382.5	Preparation for Zamzria trial-finalize trial brief and work on examination of Zamzria 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	140 Prepare for hearing on Zamzria motion to set aside judgment.
Paid	03/09/2023	CG	23641	00001	350	2.8	980	203283	2.8	980	980 Prepare for hearing on Zamzria motion to set aside judgment.
Paid	03/08/2023	CG	23641	00001	350	4.1	1435	203283	2.2	770	770 Prepare for hearing on Zamzria motion to set aside judgment.
Paid	03/08/2023	CAP	23641	00001	395	6.5	2567.5	203283	4.2	1580	Prepare cross-examination of Zamzria 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	70 Prepare for hearing on Zamzria motion to set aside judgment.
Paid	03/04/2023	CAP	23641	00001	395	4.5	1777.5	203283	3.5	1382.5	Review Watermaster's motion to enforce judgment as to Zamzria and review evidence.
Paid	03/02/2023	CG	23641	00001	350	0.5	175	203283	0	0	0 Prepare for hearing on Zamzria motion to set aside judgment.
Paid	03/01/2023	CAP	23641	00001	395	2	790	203283	1.5	592.5	Prepare for Zamzria trial by assembling exhibits and preparing cross-examination.
Paid	03/01/2023	CG	23641	00001	350	0.7	245	203283	0.7	245	Prepare for hearing on Zamzria motion to set aside judgment.
Paid	02/28/2023	CG	23641	00001	350	1	390	202612	1	350	350 Prepare for hearing on Zamzria 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	Prepare for hearing on Zamzria motion to set aside judgment, meeting with Settling Parties regarding same.
Paid	02/22/2023	CG	23641	00001	350	0.6	210	202612	0.6	210	210 Prepare for hearing on Zamzria motion.
Paid	02/21/2023	CG	23641	00001	350	0.9	315	202612	0.9	315	Prepare for hearing on Zamzria motion.
Paid	02/20/2023	CAP	23641	00001	395	2.5	987.5	202612	2.5	987.5	Prepare for and edit and amend draft exhibit list for Zamzria trial.
Paid	02/17/2023	CG	23641	00001	350	0.3	105	202612	0.3	105	105 Prepare for Zamzria hearing to set aside judgment.
Paid	02/15/2023	CAP	23641	00001	395	5.5	2172.5	202612	2.8	1106	General trial preparation for hearing on February 17th covering two matters, preparation for March 15-16 trial of Zamzria's motion to set aside judgment.
Paid	02/15/2023	CG	23641	00001	350	0.1	35	202612	0	0	0 Prepare for hearing on Zamzria motion to set aside judgment.
Paid	02/09/2023	CAP	23641	00001	395	0.8	316	202612	0.8	316	Review and edit stipulation with Zamzria counsel regarding hearing in March.
Paid	02/08/2023	CAP	23641	00001	395	4.5	1777.5	202612	1.5	592.5	Respond, finalize memos for Board.
Paid	02/08/2023	CG	23641	00001	350	0.1	35	202612	0	0	0 Zamzria motion to set aside judgment.
Paid	02/03/2023	CG	23641	00001	350	0.3	105	202612	0.3	105	105 Zamzria 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	Work on Zamzria motion to set aside judgment.
Paid	02/01/2023	CAP	23641	00001	395	2.8	1106	202612	1.5	592.5	Prepare for and participate in call with Zamzria's counsel regarding adopting a scheduling order; revise Stipulation and Order regarding Zamzria hearing.
Paid	02/01/2023	CG	23641	00001	350	1.3	455	202612	1.3	455	Meet and confer with Zamzria counsel regarding motion to set aside judgment.
Paid	01/31/2023	CG	23641	00001	270	0.2	70	201951	0.2	54	Prepare for meet and confer with Zamzria counsel regarding hearing on motions.
Paid	01/26/2023	CG	23641	00001	270	1.8	630	201951	1.8	486	Zamzria 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	Work with group of Settling Parties counsel on stipulation for conduct of evidentiary hearing in Zamzria case; edit Stipulation and Order regarding Zamzria hearing.
Paid	01/20/2023	CG	23641	00001	270	2.1	735	201951	2.1	567	Participation in Zamzria meet and confer, prepare for hearing on motions.
Paid	01/18/2023	CG	23641	00001	270	1.4	480	201951	1.4	378	Zamzria motions meet and confer process, prepare for hearing.
Paid	01/13/2023	CG	23641	00001	270	0.8	280	201951	0.8	216	Meet & Confer regarding Zamzria 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	Prepare for call with parties participating in Zamzria trial, lead discussion with counsel on Zamzria trial.
Paid	01/11/2023	CG	23641	00001	270	0.7	245	201951	0.7	180	Meet and confer regarding Zamzria motion to set aside judgment.
Paid	01/05/2023	CAP	23641	00001	395	2.5	987.5	201951	1.5	592.5	Prepare for interview of testifying witness in Zamzria hearing and interview the same.
Paid	01/04/2023	CG	23641	00001	270	0.3	105	201951	0.3	81	Review Zamzria Motion to set aside judgment.
Paid	01/03/2023	CG	23641	00001	270	0.2	70	201951	0.2	54	Research regarding Zamzria motion to set aside judgment.
Paid	12/16/2022	CAP	23641	00001	395	3.5	1382.5	201251	3.5	1382.5	Work on Zamzria trial preparation for evidentiary hearing; organize exhibits for same.
Paid	12/14/2022	CG	23641	00001	270	0.2	54	201251	0.2	40	Review Zamzria motion to set aside judgment.
Paid	12/09/2022	CG	23641	00001	270	1	270	201251	1	270	270 Prepare for hearing on Zamzria motion to set aside judgment; legal research regarding arguments in opposition to motion; document preparation.
Paid	11/28/2022	CG	23641	00001	270	0.2	54	200531	0.2	40	Negotiations with Zamzria counsel regarding procedures for hearings.
Paid	11/27/2022	CG	23641	00001	270	0.4	108	200531	0.4	108	Negotiations with Zamzria counsel regarding hearings on motions.
Paid	11/25/2022	CG	23641	00001	270	0.2	54	200531	0.2	40	Negotiations with Zamzria counsel regarding hearings on motions.
Paid	11/23/2022	CG	23641	00001	270	1.4	378	200531	1.4	378	Hearing logistics regarding Zamzria motions; discussions with Settling Parties, opposing counsel.
Paid	11/23/2022	CAP	23641	00001	395	2	780	200531	2	790	Review edits of Zamzria's counsel how 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	60	Negotiations with Zamzria counsel regarding motions, hearings and evidentiary stipulations.
Paid	11/21/2022	CAP	23641	00001	395	3.5	1382.5	200531	2.5	987.5	Prepare for and participate in discussion with PWS counsel and counsel for overviews about strategy at hearing on Zamzria, edit and amend letter to Zamzria's counsel regarding hearing date and details of trial.
Paid	11/21/2022	CG	23641	00001	270	1.7	459	200531	1.7	459	Review opposition to Zamzria motion to set aside judgment, prepare for hearing.

Paid	04/14/2022	CG	23641	00001	270	3.5	945	194898	3.5	945	194898	945	Opposition to Zamriza motions to set aside Judgment regarding Small Pumpor Class status.
Paid	04/13/2022	CAP	23641	00001	395	4.5	1777.5	194898	4.5	1777.5	194898	1777.5	Prepare for conference call with attorney's filing opposition to Zamriza motion; call with same.
Paid	04/13/2022	CG	23641	00001	270	1.5	405	194898	1.5	405	194898	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	194898	1382.5	Review voluminous documents produced by Zamriza's new counsel for evidentiary hearing.
Paid	04/12/2022	CG	23641	00001	270	0.5	162	194898	0.5	162	194898	162	Opposition to Zamriza motion to set aside Judgment.
Paid	04/11/2022	CAP	23641	00001	395	2.5	987.5	194898	2.5	987.5	194898	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	194898	243	Opposition to Zamriza motion regarding jurisdiction and small pumpor class status.
Paid	04/07/2022	CAP	23641	00001	395	2.6	1027	194898	2.6	1027	194898	1027	Zamriza - Prepare for hearing by reviewing our motion and Zamriza's opposition thereto.
Paid	04/04/2022	CAP	23641	00001	395	2.5	987.5	194898	2.5	987.5	194898	987.5	Review Long Valley motion and Court decision and integrate same into Zamriza Court hearing presentation.
Paid	04/01/2022	CG	23641	00001	270	0.9	243	194898	0.9	243	194898	243	Prepare for opposition to Zamriza motion to challenge small pumpor class status.
Paid	03/30/2022	CAP	23641	00001	395	3.5	1382.5	194010	3.5	1382.5	194010	1382.5	Zamriza - prepare for opposition to motion to pro-act small pumpor class status.
Paid	03/29/2022	CAP	23641	00001	395	3.1	1224.5	194010	3.1	1224.5	194010	1224.5	Prepare for evidentiary hearing in Zamriza; review Zamriza opposition to our motion and all declarations and prepare cross-examination questions for declaratus that we assume Zamriza will attempt to present at evidentiary hearing.
Paid	03/07/2022	CG	23641	00001	270	1.1	297	194010	1.1	297	194010	297	Prepare opposition to Zamriza's motion claiming Court has no jurisdiction over them.
Paid	03/04/2022	CG	23641	00001	270	2	540	194010	2	540	194010	540	Zamriza - prepare for and attend Zamriza motion hearing; prepare for opposition to Small Pumpor Class motion.
Paid	03/04/2022	CG	23641	00001	270	0.3	118.5	194010	0		194010	0	Conference regarding Zamriza hearing and future handling
Paid	03/03/2022	CG	23641	00001	270	1	270	194010	1	270	194010	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		194010	2.5	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	194010	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	194010	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	193183	108	Zamriza - settlement negotiations and litigation strategy.
Paid	02/24/2022	CG	23641	00001	270	1.2	324	193183	1.2	324	193183	324	Zamriza - discussions with counsel for SCI regarding Small Pumpor Class status; draft proposed order after hearing on motion.
Paid	02/18/2022	CG	23641	00001	270	1	270	193183	1	270	193183	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		193183	0	Zamriza settlement negotiations.
Paid	02/15/2022	CG	23641	00001	270	0.5	135	193183	0.5	135	193183	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	193183	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	193183	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	193183	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	193183	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	193183	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	193183	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	192203	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	192203	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	192203	987.5	Edit and amend settlement stipulation with Zamriza's counsel.
Paid	01/13/2022	TEM	23641	00001	395	0.6	237	192203	0.6	237	192203	237	Review and revise stipulated settlement with Zamriza; conference regarding same.
Paid	01/13/2022	TEM	23641	00001	395	0.5	197.5	192203	0.5	197.5	192203	197.5	Prepare stipulation regarding settlement of Zamriza matter.
Paid	01/12/2022	CG	23641	00001	270	1.7	459	192203	1.7	459	192203	459	Zamriza - draft stipulation for settlement.
Paid	01/06/2022	CAP	23641	00001	395	2.5	987.5	192203	2.5	987.5	192203	987.5	Prepare for and engage in discussions with counsel for Zamriza per Court's December 10th Order; prepare stipulation.
Paid	01/06/2022	CG	23641	00001	270	0.7	189	192203	0.7	189	192203	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	190695	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	190695	891	Zamriza - prepare reply brief; correspondence with Small Pumpor Class Counsel regarding same.
Paid	11/29/2021	CG	23641	00001	270	3	810	189750	3	810	189750	810	Zamriza - prepare for hearing with Judge Komar regarding evidentiary hearing; draft reply to opposition.
Paid	11/16/2021	CAP	23641	00001	395	2.5	987.5	189750	2.5	987.5	189750	987.5	Review Zamriza opposition declarations and outline response.
Paid	11/16/2021	CG	23641	00001	270	0.5	135	189750	0.5	135	189750	135	Zamriza - review opposition to Motion for collection of RVAs; generate reply thereto; correspondence with Watermaster Engineer regarding same.
Paid	11/15/2021	CG	23641	00001	270	0.4	108	189750	0.4	108	189750	108	Review Zamriza opposition to RVAs motion.
Paid	11/04/2021	CAP	23641	00001	395	3.8	1501	189750	2.8	1108	189750	1108	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 Burnfield's clients.
Grand Totals:						481.5	\$178,701.00			\$144,350.00			

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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 November 3, 2023, I served the foregoing document described **WATERMASTER'S OPPOSITION TO ZAMRZLAS' MOTION TO STAY PROCEEDINGS AGAINST THEM PENDING APPEAL; 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 November 3, 2023, at Santa Barbara, California.



Signature
Elizabeth Wright