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6 Attorneys for Cross-Defendants Eyherabide Sheep  
Co., Eyherabide Land Company, LLC as Successor in  
7 Interest to Raymond Eyherabide and Juanita  
Eyherabide Trustee

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA

9 COUNTY OF LOS ANGELES – CENTRAL DISTRICT

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11 **ANTELOPE VALLEY GROUNDWATER  
CASES**

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Included Actions:

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Los Angeles County Waterworks District No.  
40 v. Diamond Farming Co., Superior Court of  
14 California, County of Los Angeles, Case No.  
BC 325201;

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Los Angeles County Waterworks District No.  
16 40 v. Diamond Farming Co., Superior Court of  
California, County of Kern, Case No. S-1500-  
17 CV-254-348;

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Wm. Bolthouse Farms, Inc. v. City of  
19 Lancaster, Diamond Farming Co. v. City of  
Lancaster, Diamond Farming Co. v. Palmdale  
20 Water Dist., Superior Court of California,  
County of Riverside, Case Nos. RIC 353 840,  
RIC 344 436, RIC 344 668  
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Judicial Council Cordination No. 4408

CLASS ACTION

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

STIPULATION AND PROPOSED ORDER  
TO SET ASIDE DEFAULT OF CROSS-  
DEFENDANTS EYHERABIDE SHEEP  
CO., RAYMOND EYHERABIDE, AND  
JUANITA EYHERABIDE; AND, FOR AN  
ORDER ALLOWING THE  
APPEARANCE OF EYHERABIDE  
SHEEP CO. AND EYHERABIDE LAND  
COMPANY, LLC, AS SUCCESSOR IN  
INTEREST TO RAYMOND  
EYHERABIDE AND JUANITA  
EYHERABIDE, TRUSTEE, BY FILING  
AN ANSWER

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It is hereby stipulated by and between the Cross-Complainant, LOS ANGELES  
24 COUNTY WATERWORKS DISTRICT NO. 40, by and through its counsel of record BEST BEST  
25 & KRIEGER, LLP and Cross-Defendants, EYHERABIDE SHEEP CO., RAYMOND  
26 EYHERABIDE, and JUANITA EYHERABIDE, TRUSTEE, EYHERABIDE LAND COMPANY,  
27 LLC AS SUCCESSOR IN INTEREST TO RAYMOND AND JUANITA EYHERABIDE  
28 TRUSTEE by and through its counsel of record, Calvin R. Stead of Borton Petrini LLP to set aside

1 the Request for Entry of Default entered on March 22, 2012, in the above-entitled Court, of  
2 EYHERABIDE SHEEP CO., RAYMOND EYHERABIDE, and JUANITA EYHERABIDE; and,  
3 for an Order allowing the appearance of EYHERABIDE SHEEP CO. and EYHERABIDE LAND  
4 COMPANY, LLC, as successor in interest to RAYMOND EYHERABIDE and JUANITA  
5 EYHERABIDE, TRUSTEE, by filing an Answer.

6 DATED: August 29, 2012

BEST BEST & KRIEGER, LLP

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10 Stefanie Morris, Attorneys for Cross-Complainant Los Angeles County Waterworks District No. 40

11 DATED: August 28, 2012

BORTON PETRINI, LLP

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14 Calvin R. Stead, Attorneys for Cross-Defendants Eyherabide Sheep Co., Eyherabide Land Company, LLC as Successor in Interest to Raymond and Juanita Eyherabide Trustee

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**ANTELOPE VALLEY GROUNDWATER CASES**

Santa Clara Case No. 1-05-CV-049053

**PROPOSED ORDER**

IT IS HEREBY ORDERED, pursuant to the Stipulation by all parties, as follows:

1. The Request for Entry of Default entered on March 22, 2012, in the above-entitled Court of EYHERABIDE SHEEP CO., RAYMOND EYHERABIDE, and JUANITA EYHERABIDE, TRUSTEE is hereby set aside;

2. Cross-Defendants, EYHERABIDE SHEEP CO. and EYHERABIDE LAND COMPANY, LLC, as successor in interest to RAYMOND EYHERABIDE and JUANITA EYHERABIDE, TRUSTEE shall file an Answer to Cross-Complaint no later than fifteen (15) days after the entry of this Order.

DATED: \_\_\_\_\_

\_\_\_\_\_  
Superior Court Judge

**PROOF OF SERVICE**

I, Patricia Alshabazz, declare:

I am a resident of the State of California and over the age of eighteen years, and not a party to the within action; my business address is Best Best & Krieger LLP, 500 Capitol Mall, Suite 1700, Sacramento, California 95814. On August 29, 2012, I served the within document(s):

**STIPULATION AND PROPOSED ORDER TO SET ASIDE DEFAULT OF CROSS-DEFENDANTS EYHERABIDE SHEEP CO., RAYMOND EYHERABIDE, AND JUANITA EYHERABIDE; AND, FOR AN ORDER ALLOWING THE APPEARANCE OF EYHERABIDE SHEEP CO. AND EYHERABIDE LAND COMPANY, LLC, AS SUCCESSOR IN INTEREST TO RAYMOND EYHERABIDE AND JUANITA EYHERABIDE, TRUSTEE, BY FILING AN ANSWER**

- by posting the document(s) listed above to the Santa Clara County Superior Court website in regard to the Antelope Valley Groundwater matter.
- by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Sacramento, California addressed as set forth below.
- by causing personal delivery by ASAP Corporate Services of the document(s) listed above to the person(s) at the address(es) set forth below.
- by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.
- I caused such envelope to be delivered via overnight delivery addressed as indicated on the attached service list. Such envelope was deposited for delivery by Federal Express following the firm's ordinary business practices.

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

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

Executed on August 29, 2012, at Sacramento, California.

  
Patricia Alshabazz