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5 Attorneys for DIAMOND FARMING COMPANY,
a California corporation, CRYSTAL ORGANIC
6 FARMS, a limited liability company, GRIMMWAY
ENTERPRISES, INC., and LAPIS LAND COMPANY, LLC
7

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **IN AND FOR THE COUNTY OF LOS ANGELES**
10

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

Judicial Council Coordination No. 4408

13 ANTELOPE VALLEY GROUNDWATER
14 CASES

Case No.: 1-05-CV-049053

15 Included actions:

**STIPULATION OF FACTS FOR TRIAL
PURSUANT TO CASE MANAGEMENT
ORDER FOR PHASE IV TRIAL**

16 Los Angeles County Waterworks District No.
40 vs. Diamond Farming Company
Los Angeles Superior Court
Case No. BC 325201
17

Date: March 25, 2013
Time: 9:00 a.m.
Dept: 1

18 Los Angeles County Waterworks District No.
40 vs. Diamond Farming Company
Kern County Superior Court
Case No. S-1500-CV 254348 NFT
19

20 Diamond Farming Company vs. City of
Lancaster
21 Riverside County Superior Court
Lead Case No. RIC 344436 [Consolidated
22 w/Case Nos. 344668 & 353840]
23

24 AND RELATED CROSS-ACTIONS.

25
26 The following entities: DIAMOND FARMING COMPANY, CRYSTAL ORGANIC FARMS,
27 GRIMMWAY ENTERPRISES, INC., and LAPIS LAND COMPANY, LLC (each individually a
28

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1 “Stipulating Party” and collectively, the “Stipulating Parties”), by their counsel, hereby stipulate as
2 follows:

3 WHEREAS, each of the Stipulating Parties is a named party in these coordinated proceedings;

4 WHEREAS, the Stipulating Parties filed Declarations in this coordinated action, as required by
5 the Court in its Case Management Order for Phase IV Trial;

6 WHEREAS, each individual Stipulating Party has had adequate opportunity to examine the
7 Stipulation filed by the other Stipulating Parties posted on the Court’s website February 28, 2013 and
8 to review the claimed amounts of groundwater production from 2000-2004 and 2011-2012;

9 NOW THEREFORE, for the purposes of the Phase IV Trial in this action, the Stipulating Parties
10 hereby stipulate, individually and collectively, to the truth of the information as to land ownership and
11 groundwater production submitted in the Stipulating Parties’ Declarations filed January 31, 2013 and
12 the information posted by the Stipulating Parties on the Court website in response to the Court’s Phase
13 IV Discovery Order on December 21, 2012. These facts are undisputed and may be treated as facts
14 proven in open court.

15 IT IS SO STIPULATED.

16
17 Dated: March 22, 2013

LeBEAU • THELEN, LLP

18
19
20 By: 

BOB H. JOYCE
Attorneys for DIAMOND FARMING COMPANY,
a California corporation, CRYSTAL ORGANIC
FARMS, a limited liability company, GRIMMWAY
ENTERPRISES, INC., and LAPIS LAND
COMPANY, LLC

PROOF OF SERVICE

ANTELOPE VALLEY GROUNDWATER CASES
JUDICIAL COUNCIL PROCEEDING NO. 4408
CASE NO.: 1-05-CV-049053

I am a citizen of the United States and a resident of the county aforesaid; I am over the age of eighteen years and not a party to the within action; my business address is: 5001 E. Commercenter Drive, Suite 300, Bakersfield, California 93309. On March 22, 2013, I served the within

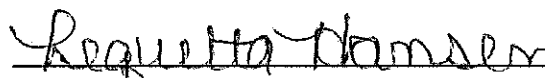
**STIPULATION OF FACTS FOR TRIAL PURSUANT TO CASE MANAGEMENT ORDER
FOR PHASE IV TRIAL**

■ **(BY POSTING)** I am "readily familiar" with the Court's Clarification Order. Electronic service and electronic posting completed through www.sceffiling.org ; All papers filed in Los Angeles County Superior Court and copy sent to trial judge and Chair of Judicial Council.

Los Angeles County Superior Court
111 North Hill Street
Los Angeles, CA 90012
Attn: **Department 1**
(213) 893-1014

Chair, Judicial Council of California
Administrative Office of the Courts
Attn: Appellate & Trial Court Judicial Services
(Civil Case Coordinator)
Carlotta Tillman
455 Golden Gate Avenue
San Francisco, CA 94102-3688
Fax (415) 865-4315

■ **(STATE)** I declare under penalty of perjury under the laws of the State of California that the above is true and correct, and that the foregoing was executed on March 22, 2013, in Bakersfield, California.


LEQUETTA HANSEN