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6	Attorneys for Defendants JOHNNY ZAMRZLA, PAMELLA ZAMRZLA, JOHNNY LEE		
7	ZAMRZLA AND JEANETTE ZAMRZLA (collectively "ZAMRZLA'S")		
8	SUPERIOR COURT OF THE STATE OF CALIFORNIA		
9	COUNTY OF LOS ANGELES - CENTRAL DISTRICT		
10			
11	Coordinated Proceeding Special Title (Rule 1550(b))	Judicial Council Coordination Proceeding No.: 4408	
12	Special The (Rule 1550(0))	LASC Case No. BC325201	
13	GROUNDWATER CASES.	Santa Clara Sup. Court Case No.: 1-05-CV 049053	
14		Assigned to Hon. Jack Komar, Judge of the Santa Clara County Superior Court	
15		NOTICE OF MOTION BY THE ZAMRZLAS	
16		TO STAY THE PROCEEDINGS AGAINST THEM PENDING APPEAL	
17		Date: To Be Determined	
18		Time: To Be Determined Dept.: Court Call	
19 20		TTODNEVS OF DECODD.	
20	TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:		
21	PLEASE TAKE NOTICE that on a date and time to be determined by the Court, Johnny		
22	Zamrzla, Johnny Lee Zamrzla, and Jeanette Zamrzla (collectively "Zamrzlas") will and hereby do		
23	move for an order that the Court stay the proceedings against them pending appeal.		
24	Good cause exists for the Court to grant this motion as pursuant to Code of Civil procedure		
25	section 916(a), the filing of the Zamrzlas' notice of appeal automatically stays all trial court		
26	proceedings against them in this matter. Additionally, the Court has the inherent power to stay the		
27	proceedings against the Zamrzlas during the pending appeal to ensure the orderly administration of		
28	justice and to promote judicial efficiency. (Code Civ. Proc., § 128.) The Court also has the statutory		
	NOTICE OF MOTION BY THE ZAMRZLAS TO STAY THE PROCEEDINGS AGAINST THEM PENDING APPEAL		

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Atkinson, Andelson, Loya, Ruud & Romo AT LAW ENUE, SUITE 300 A PROFESSIONAL CORPORATION 201 SOUTH LAKE AVENUE, SUITE 3 PASADENA, CALIFORNIA 91101-4: TELEPHONE: (626) 583-8600 FAX: (626) 583-8610

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1 power to stay enforcement of any judgment or order. (Code Civ. Proc., § 918(a).)

2 The motion is based on this Notice, the memorandum of points and authorities in support 3 thereof, the declaration of Wesley Miliband, and all pleadings, documents and evidence on file in 4 this action, and on such oral and documentary evidence as may be presented at the hearing on this 5 motion.

Dated: October 20, 2023

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ATKINSON, ANDELSON, LOYA, RUUD & ROMO

By:

Wesley A. Miliband Attorneys for Defendants JOHNNY ZAMRZLA, PAMELLA ZAMRZLA, JOHNNY LEE ZAMRZLA AND JEANETTE ZAMRZLA (collectively "ZAMRZLA'S")

NOTICE OF MOTION BY THE ZAMRZLAS TO STAY THE PROCEEDINGS AGAINST THEM PENDING APPEAL

- 2 -

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	1	PROOF OF SERVICE
	2	(CODE CIV. PROC. § 1013A(3))
	3	STATE OF CALIFORNIA, COUNTY OF LOS ANGELES
	4 5	I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and am not a party to the within action; my business address is 201 South Lake Avenue, Suite
	6	300, Pasadena, California 91101-4869. On October 20, 2023, I served the following document(s) described as <b>NOTICE OF</b>
	7	MOTION BY THE ZAMRZLAS TO STAY THE PROCEEDINGS AGAINST THEM PENDING APPEAL on the interested parties in this action as follows:
	8	
0	9	
Romo	10	BY ELECTRONIC SERVICE: by posting the document(s) listed above to the
а	11	Antelope Valley Groundwater Cases to all parties listed on the Santa Clara Superior Court Service List as maintained via Glotrans. Electronic service completed through
RUUD on 4869 0	12	http://www.avwatermaster.org.
OYA, R DRPORATION TLAW ULE, SUITE 3C A 91101-48 583-8600 3-8610	13	I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.
, LO AL CORF AL CORF AVENUE SYS AT L AVENUE 626) 58 626) 583-6	14	Executed on October 20, 2023, at Pasadena, California.
SON ATTORNE ATTORNE TH LAKE A, CALIF HONE: ( ( 2)	15	Laborer Kammed
NDEL A PROF 201 Sout	16	Ashlie T. Kennedy
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