

1 ATKINSON, ANDELSON, LOYA, RUUD & ROMO
2 A Professional Law Corporation
3 Wesley A. Miliband State Bar No. 241283
4 Wes.Miliband@aalrr.com
5 2151 River Plaza Drive, Suite 300
6 Sacramento, CA 95833
7 Telephone: (916) 923-1200
8 Fax: (918) 923-1222

9 Attorneys for Defendants JOHNNY ZAMRZLA,
10 PAMELLA ZAMRZLA, JOHNNY LEE
11 ZAMRZLA AND JEANETTE ZAMRZLA
12 (collectively "ZAMRZLAS")

13 SUPERIOR COURT OF THE STATE OF CALIFORNIA
14 COUNTY OF LOS ANGELES - CENTRAL DISTRICT

15 Coordinated Proceeding
16 Special Title (Rule 1550(b))

17 ANTELOPE VALLEY
18 GROUNDWATER CASES.

Judicial Council Coordination
Proceeding No.: 4408

LASC Case No. BC325201

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

**OBJECTION TO THE COURT'S ORDER
SETTING THE NOVEMBER 17, 2023
HEARING ON THE WATERMASTER'S
RENEWED MOTION FOR MONETARY,
DECLARATORY AND INJUNCTIVE RELIEF
AGAINST ZAMRZLAS AND ZAMRZLAS'
MOTION TO STAY PROCEEDINGS
AGAINST THEM PENDING APPEAL**

19 Johnny Zamrzla, Johnny Lee Zamrzla and Jeanette Zamrzla (collectively "Zamrzlas") object
20 to the Court's October 18, 2023 Order setting a November 17, 2023 hearing on the Watermaster's
21 Renewed Motion for Monetary, Declaratory and Injunctive Relief Against the Zamrzlas.

22 The Zamrzlas further object to the Court's October 24, 2023 Order setting the Watermaster's
23 Renewed Motion for Monetary, Declaratory and Injunctive Relief Against the Zamrzlas and the
24 Zamrzlas Motion to Stay Proceedings Against Them Pending Appeal for hearing on November 17,
25 2023.
26
27
28

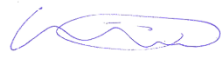
1 The Watermaster’s Renewed Motion cannot proceed for the reasons briefed in the Zamrzlas’
2 Objection/Opposition to the Watermaster’s Renewed Motion and the Zamrzlas’ Motion to Stay. For
3 the same reasons, the two hearings cannot proceed concurrently.

4 Specifically, all trial court proceedings against the Zamrzlas are automatically stayed
5 pending appeal pursuant to Code of Civil Procedure section 916(a). Moreover, even if the
6 proceedings against the Zamrzlas are not automatically stayed, this Court has the power to stay the
7 proceedings. The interests of justice require a stay of the proceedings against the Zamrzlas in this
8 matter.

9 Accordingly, the Zamrzlas request that the Watermaster’s motion date be vacated pending
10 resolution of the issue for stay by this Court or the Court of Appeal should this Court deny the
11 Zamrzlas’ motion.

12
13 Dated: October 25, 2023

ATKINSON, ANDELSON, LOYA, RUUD & ROMO

14 By: 
15 _____
16 Wesley A. Miliband
17 Attorneys for Defendants JOHNNY ZAMRZLA,
18 PAMELLA ZAMRZLA, JOHNNY LEE
19 ZAMRZLA AND JEANETTE ZAMRZLA
20 (collectively “ZAMRZLAS”)
21
22
23
24
25
26
27
28

ATKINSON, ANDELSON, LOYA, RUUD & ROMO
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
201 SOUTH LAKE AVENUE, SUITE 300
PASADENA, CALIFORNIA 91101-4869
TELEPHONE: (626) 583-8600
FAX: (626) 583-8610

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE

(CODE CIV. PROC. § 1013A(3))

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES


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 300, Pasadena, California 91101-4869.

On October 25, 2023, I served the following document(s) described as **OBJECTION TO THE COURT'S ORDER SETTING THE NOVEMBER 17, 2023 HEARING ON THE WATERMASTER'S RENEWED MOTION FOR MONETARY, DECLARATORY AND INJUNCTIVE RELIEF AGAINST ZAMRZLAS AND ZAMRZLAS' MOTION TO STAY PROCEEDINGS AGAINST THEM PENDING APPEAL** on the interested parties in this action as follows:

BY ELECTRONIC SERVICE: by posting the document(s) listed above to the Antelope Valley Groundwater Cases to all parties listed on the Santa Clara Superior Court Service List as maintained via Glotrans. Electronic service completed through <http://www.avwatermaster.org>.

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

Executed on October 25, 2023, at Pasadena, California.



Ashlie T. Kennedy