JOHN J. SCHATZ (SBN 141029) 1 Attorney at Law 2 P.O. Box 7775 Laguna Niguel, CA 92607-7775 Telephone: (949) 683-0398 3 Email: jschatz13@cox.net 4 Attorney for Defendant Rancho Sierra Properties, LLC 5 6 7 8 SUPERIOR COURT OF THE STATE OF CALIFORNIA 9 FOR THE COUNTY OF LOS ANGELES - CENTRAL DISTRICT 10 Judicial Council Coordination **Coordination Proceeding** 11 Proceeding no. 4408 Special Title (Rule 1550(b)) 12 Santa Clara Case No. 1-05-CV-049053 ANTELOPE VALLEY Assigned to the Honorable Jack Komar, Judge of JOHN SCHATZ
Attorney at Law
P.O. Box 7775
Laguna Niguel, CA 92607-7775 **GROUNDWATER CASES** 13 the Santa Clara Superior Court 14 DECLARATION OF JOHN J. SCHATZ IN SUPPORT OF NOTICE OF APPEARANCE 15 16 17 Date: December 13, 2022 AND RELATED ACTIONS. 18 Time: 9:00 a.m. Dept.: Department 22 or Microsoft Teams 19 20 21 22 23 24 25 26 27 28

DECLARATION OF JOHN J. SCHATZ IN SUPPORT OF NOTICE OF APPEARANCE

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- 1. I, John J. Schatz, am an attorney licensed to practice in the State of California. Based upon my knowledge and experience, I can competently attest to the following facts.
- 2. I am counsel for Rancho Sierra Properties, LLC (RSP) and this Declaration is made in support of my Notice of Appearance concurrently filed with this Declaration.
- 3. RSP engaged my services in November solely limited to negotiating a stipulation for settlement with Antelope Valley Watermaster in connection with Watermaster's Motion for Monetary, Declaratory, And Injunctive Relief Against Rancho Sierra Properties, LLC; Declarations of Craig A. Parton and Patricia Rose, Exhibits 1-6, for a payment plan that may include obtaining water through a transfer to make an in-kind payment of a Replacement Water Assessment.
- 4. I have been engaged in negotiations with Watermaster General Counsel for a payment plan since November 17, 2022 and on Saturday, December 3, 2022 received via email a Draft Stipulation And [Proposed] Order For Settlement Of Watermaster's Motion For Monetary, Declaratory And Injunctive Relief Against Ranch Sierra Properties, LLC (Draft Stipulation) prepared by Watermaster General Counsel.
- 5. On Sunday, December 4, 2022, I transmitted to Watermaster General Counsel comments and suggested revisions to the Draft Stipulation.
- 6. On Monday, December 5, 2022, Watermaster General transmitted a revised Draft Stipulation substantially incorporating RSP's proposed revisions and providing additional comments.
- 7. On the afternoon of Wednesday, December 7, 2022, I engaged in communications with Watermaster following consideration of the Draft Stipulation by the Antelope Valley Watermaster Board of Directors.
- 8. The parties have not yet been able to finalize a Stipulation. Up to and including the date of filing this Declaration good faith negotiations continue with Watermaster General Counsel.
- 9. Based on the on-going negotiations, my client would request that the Court continue this motion, or in the alternative that the Court impose a 60-day stay of the effective date of

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any order granting Watermaster's motion., This continuation, or in the alternative stay of the effective date of the Order will facilitate the continuance of good faith negotiations to reach a mutually satisfactory payment plan.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 9th day of December 2022, in the City of Laguna Niguel and County of Orange, State of California.

By: JOHN J. SCHATZ