

BEST BEST & KRIEGER LLP

ERIC L. GARNER, Bar No. 130665

JEFFREY V. DUNN, Bar No. 131926

STEFANIE D. MORRIS, Bar No. 239787

18101 VON KARMAN AVENUE, SUITE 1000

IRVINE, CALIFORNIA 92612

TELEPHONE: (949) 263-2600

FACSIMILE: (949) 260-0972

Attorneys for Cross-Complainant

LOS ANGELES COUNTY WATERWORKS

DISTRICT NO. 40

OFFICE OF COUNTY COUNSEL

COUNTY OF LOS ANGELES

JOHN F. KRATTLI, Bar No. 82149

COUNTY COUNSEL

WARREN WELLEN, Bar No. 139152

PRINCIPAL DEPUTY COUNTY COUNSEL

500 WEST TEMPLE STREET

LOS ANGELES, CALIFORNIA 90012

TELEPHONE: (213) 974-8407

TELECOPIER: (213) 687-7337

Attorneys for Cross-Complainant LOS ANGELES

COUNTY WATERWORKS DISTRICT NO. 40

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

**ANTELOPE VALLEY
GROUNDWATER CASES**

Included Actions:

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

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

Wm. Bolthouse Farms, Inc. v. City of
Lancaster, Diamond Farming Co. v. City of
Lancaster, Diamond Farming Co. v.
Palmdale Water Dist., Superior Court of
California, County of Riverside, Case Nos.
RIC 353 840, RIC 344 436, RIC 344 668

Judicial Council Coordination No. 4408

CLASS ACTION

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

**STIPULATION WITH SANITATION
DISTRICTS OF LOS ANGELES NOS. 14
AND 20**

STIPULATION

Los Angeles Waterworks District No. 40, City of Palmdale, City of Lancaster, Littlerock Creek Irrigation District, Palm Ranch Irrigation District, Palmdale Water District, Quartz Hill Water District, Rosamond Community Services District, and California Water Service Company (collectively, the "Public Water Suppliers") hereby enter into the following stipulation with Sanitation Districts of Los Angeles Nos. 14 and 20.

This Stipulation is entered pursuant to the Fifth Amended Case Management Order for the Phase 4 Trial. This Stipulation is only for the purpose of determining groundwater pumping during 2011 and 2012. This stipulation shall not result in any determination of any water right, or the reasonableness of any party's water use or manner of applying water to the use. This Stipulation will not preclude any party from introducing in a later phase evidence to support its claimed water rights including, without limitation, evidence of water use in years other than 2011 and 2012. All parties reserve their rights to produce any evidence to support their claimed water rights and make any related legal arguments including, without limitation, arguments based on applicable constitutional, statutory, or decisional authority.

The parties hereto hereby stipulate that the groundwater pumped by Sanitation Districts of Los Angeles Nos. 14 and 20 was 575 acre feet in 2011 and 551 acre feet in 2012.

Dated: May 13, 2013

BEST BEST & KRIEGER LLP

By


ERIC L. GARNER

JEFFREY V. DUNN

STEFANIE D. MORRIS

Attorneys for Cross-Complainant


LOS ANGELES COUNTY

WATERWORKS DISTRICT NO. 40

LAW OFFICES OF
BEST BEST & KRIEGER LLP
3750 UNIVERSITY AVENUE, SUITE 400
P.O. BOX 1028
RIVERSIDE, CALIFORNIA 92502

1 Dated: May23, 2013

2
3 By


JAMES L. MARKMAN
STEVEN ORR
Attorneys for Cross-Defendant
CITY OF PALMDALE

4
5
6 Dated: May __, 2013

7
8 By

DOUGLAS J. EVERTZ
Attorneys for Cross-Defendant
CITY OF LANCASTER AND
ROSAMOND COMMUNITY SERVICES
DISTRICT

9
10
11 Dated: May __, 2013

12
13 By

WAYNE LEMIEUX
Attorneys for Cross-Defendant
LITTLE ROCK CREEK IRRIGATION
DISTRICT AND PALM RANCH
IRRIGATION DISTRICT

14
15
16 Dated: May __, 2013

17
18 By

THOMAS BUNN III
Attorneys for Cross-Defendant
PALMDALE WATER DISTRICT

19
20
21 Dated: May __, 2013

22
23 By

BRADLEY T. WEEKS
Attorneys for Cross-Defendant
QUARTZ HILL WATER DISTRICT

LAW OFFICES OF
BEST BEST & KRIEGER LLP
3750 UNIVERSITY AVENUE, SUITE 400
P.O. BOX 1028
RIVERSIDE, CALIFORNIA 92502

1 Dated: May __, 2013

2

3

By

JAMES L. MARKMAN
STEVEN ORR
Attorneys for Cross-Defendant
CITY OF PALMDALE

4

5

6

7

Dated: May __, 2013

8

9

10

11

12

13

Dated: May __, 2013

14

15

16

17

18

19

Dated: May 23, 2013

20

21

22

23

24

Dated: May __, 2013

25

26

27

28


By

DOUGLAS J. EVERTZ
Attorneys for Cross-Defendant
CITY OF LANCASTER AND
ROSAMOND COMMUNITY SERVICES
DISTRICT

By

WAYNE LEMIEUX
Attorneys for Cross-Defendant
LITTLE ROCK CREEK IRRIGATION
DISTRICT AND PALM RANCH
IRRIGATION DISTRICT

By


THOMAS BUNN III
Attorneys for Cross-Defendant
PALMDALE WATER DISTRICT

By

BRADLEY T. WEEKS
Attorneys for Cross-Defendant
QUARTZ HILL WATER DISTRICT

LAW OFFICES OF
BEST BEST & KRIEGER LLP
3750 UNIVERSITY AVENUE, SUITE 400
P.O. BOX 1028
RIVERSIDE, CALIFORNIA 92502

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

Dated: May __, 2013

By John Tootle
JOHN TOOTLE
Attorneys for Cross-Defendant
CALIFORNIA WATER SERVICE
COMPANY

Dated: May __, 2013

By _____
CHRISTOPHER SANDERS
Attorneys for
SANITATION DISTRICTS OF LOS
ANGELES NOS. 14 AND 20

26345.00000\7983584.1

LAW OFFICES OF
BEST BEST & KRIEGER LLP
3750 UNIVERSITY AVENUE, SUITE 400
P.O. BOX 1028
RIVERSIDE, CALIFORNIA 92502

1 Dated: May __, 2013

2
3 By
4 JAMES L. MARKMAN
5 STEVEN ORR
6 Attorneys for Cross-Defendant
7 CITY OF PALMDALE

8
9 Dated: May __, 2013

10
11 By
12 DOUGLAS J. EVERTZ
13 Attorneys for Cross-Defendant
14 CITY OF LANCASTER AND
15 ROSAMOND COMMUNITY SERVICES
16 DISTRICT

17
18 Dated: May __, 2013

19
20 By
21 WAYNE LEMIEUX
22 Attorneys for Cross-Defendant
23 LITTLEROCK CREEK IRRIGATION
24 DISTRICT AND PALM RANCH
25 IRRIGATION DISTRICT

26
27 Dated: May __, 2013

28
29 By
30 THOMAS BUNN III
31 Attorneys for Cross-Defendant
32 PALMDALE WATER DISTRICT

33
34 Dated: May __, 2013

35
36 By
37 BRADLEY T. WEEKS
38 Attorneys for Cross-Defendant
39 QUARTZ HILL WATER DISTRICT

LAW OFFICES OF
BEST BEST & KRIEGER LLP
3750 UNIVERSITY AVENUE, SUITE 400
P.O. BOX 1028
RIVERSIDE, CALIFORNIA 92502

1 Dated: May __, 2013

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

Dated: May 23, 2013

By

JAMES L. MARKMAN
STEVEN ORR
Attorneys for Cross-Defendant
CITY OF PALMDALE

By

DOUGLAS J. EVERTZ
Attorneys for Cross-Defendant
CITY OF LANCASTER AND
ROSAMOND COMMUNITY SERVICES
DISTRICT

Dated: May __, 2013

By

WAYNE LEMIEUX
Attorneys for Cross-Defendant
LITTLEROCK CREEK IRRIGATION
DISTRICT AND PALM RANCH
IRRIGATION DISTRICT

Dated: May __, 2013

By

THOMAS BUNN III
Attorneys for Cross-Defendant
PALMDALE WATER DISTRICT

Dated: May __, 2013

By

BRADLEY T. WEEKS
Attorneys for Cross-Defendant
QUARTZ HILL WATER DISTRICT

1 Dated: May __, 2013

2
3 By
4 JAMES L. MARKMAN
5 STEVEN ORR
6 Attorneys for Cross-Defendant
7 CITY OF PALMDALE

8 Dated: May __, 2013

9 By
10 DOUGLAS J. EVERTZ
11 Attorneys for Cross-Defendant
12 CITY OF LANCASTER AND
13 ROSAMOND COMMUNITY SERVICES
14 DISTRICT

15 Dated: May __, 2013

16 By
17 WAYNE LEMIEUX
18 Attorneys for Cross-Defendant
19 LITTLEROCK CREEK IRRIGATION
20 DISTRICT AND PALM RANCH
21 IRRIGATION DISTRICT

22 Dated: May __, 2013

23 By
24 THOMAS BUNN III
25 Attorneys for Cross-Defendant
26 PALMDALE WATER DISTRICT

27 Dated: May __, 2013

28 By
BRADLEY T. WEEKS
Attorneys for Cross-Defendant
QUARTZ HILL WATER DISTRICT

LAW OFFICES OF
BEST BEST & KRIEGER LLP
3750 UNIVERSITY AVENUE, SUITE 400
P.O. BOX 1028
RIVERSIDE, CALIFORNIA 92502


1 Dated: May __, 2013
2
3

4 By

JOHN TOOTLE
Attorneys for Cross-Defendant
CALIFORNIA WATER SERVICE
COMPANY

5
6
7 Dated: May 23, 2013
8

9 By


CHRISTOPHER SANDERS
Attorneys for
SANITATION DISTRICTS OF LOS
ANGELES NOS. 14 AND 20

10
11 26345.00000\7983584.1
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 I declare that:

2 I am employed in the County of Sacramento, State of California. I am over the age of
3 eighteen years and am not a party to the within action. My business address is ELLISON,
4 SCHNEIDER & HARRIS; 2600 Capitol Avenue, Suite 400; Sacramento, California 95816;
5 telephone (916) 447-2166.

6 On May 28, 2013, I served the *Stipulation with Sanitation Districts of Los Angeles Nos.*
7 *14 and 20* by electronic posting to the Santa Clara Superior Court E-Filing website,
8 <http://www.scefiling.org/cases/casehome.jsp?caseId=19>.

9 I declare under penalty of perjury that the foregoing is true and correct and that this
10 declaration was executed on May 28, 2013, at Sacramento, California.

11
12
13 

14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
Patty Slomski