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11 **Attorneys for Cross-Defendant**
12 **Copa De Oro Land Company**

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
14 **COUNTY OF LOS ANGELES**

15 **Coordination Proceeding Special Title**
16 **(Rule 1550(b))**

17 **ANTELOPE VALLEY GROUNDWATER**
18 **CASES**

19 **Included Actions:**

20 **Los Angeles County Waterworks District**
21 **No. 40 v. Diamond Farming Co., Superior**
22 **Court of California, County of Los Angeles;**
23 **Case No. BC 325 201;**

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

28 **Wm. Bolthouse Farms, Inc. v. City of**
Lancaster, Diamond Farming Co. v.
Lancaster, Diamond Farming Co. v.
Palmdale Water Dist., Superior Court of
California, County of Riverside, Case No.
RIC 353 840, RIC 344 436, RIC 344 668

JUDICIAL COUNCIL COORDINATION
PROCEEDING NO. 4408

Case No. BC 391869
Assigned to Hon. Jack Komar

(Santa Clara Case No. 01-05-CV-049053)

MEET AND CONFER STATEMENT OF
COPA DE ORO LAND COMPANY

BY FAX

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

8792/P022713rsb CMC Statement

MEET AND CONFER STATEMENT OF COPA DE ORO LAND COMPANY

1 **MEET AND CONFER STATEMENT**

2 Pursuant to the Court's January 22, 2013 First Amendment To Case Management Order
3 For Phase Four Trial ("Order"), the parties served over 50 detailed declarations concerning
4 their properties and water use on January 31 and, in the case of other parties, February 8. To
5 date, however, the service of those declarations has resulted in few stipulations, perhaps
6 because of the volume of information contained in those declarations. In order to simplify
7 discovery and trial, if the Court does not treat the declarations filed pursuant to the January 22
8 Order as binding if they have received no objection, Copa de Oro Land Company proposes that
9 the Court take advantage of the March 25, 2013 case management conference that it already
10 has scheduled in this matter and extend certain deadlines and dates set in the Order as follows:

11

DATE	EVENT
12 3/11/2013 (from 13 2/28/2013)	Stipulations to declarations of the parties be filed and served
14 3/18/2013	Any oppositions to stipulations to declarations be filed and served, with supporting information.
15 3/25/2013 (from 16 3/15/2013)	Order to Show Cause hearing re: approval of stipulations of the parties on evidence relevant to the Phase Four Trial.

17 The Court also should allow adverse parties that subsequently conclude stipulations
18 concerning trial evidence to initiate a similar process before trial by filing an ex parte
19 application for the setting of an order to show cause hearing, with their signed stipulations
20 being filed in support of the application.

21 Dated: February 28, 2013

Respectfully submitted,

22 BARTKIEWICZ, KRONICK & SHANAHAN
23 A Professional Corporation

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25 By: _____

Ryan S. Bezerra

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27 Attorneys for Cross-Defendant Copa de Oro Land
28 Company

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I am a citizen of the United States and a resident of Sacramento County. I am over the age of 18, not a party to this action and am employed at Bartkiewicz, Kronick & Shanahan, 1011 Twenty-Second Street, Sacramento, California 95816. On February 28, 2013, I served, in the manner described below, the following document:

MEET AND CONFER STATEMENT OF COPA DE ORO LAND COMPANY

I posted this document to the Court's World Wide Website located at www.scefiling.org.

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

Executed at Sacramento, California on February 28, 2013.


Terry M. Olson