LAW OFFICES OF 1 SHELDON R. BLUM 2242 CAMDEN AVENUE, SUITE 201 2 SAN JOSE, CALIFORNIA 95124 TEL: (408) 377-7320 3 Fax: (408) 377-2199 STATE BAR No. 83304 4 Attorney for BLUM TRUST 5 6 7 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA 8 IN AND FOR THE COUNTY OF LOS ANGELES 9 Coordinated Proceedings Special Title (Rule 1550 (b)) Judicial Council Coordination Proceeding No. 4408 **ANTELOPE VALLEY GROUNDWATER** Santa Clara Case No. 1-05-CV-049053 CASES 12 Included Actions: Assigned to Hon. Jack Komar 13 Los Angeles County Waterworks District STIPULATION OF BLUM TRUST AND PUBLIC No. 40 v. Diamond Farming Co. WATER SUPPLIERS FOR PHASE 4 TRIAL os Angeles County Superior Court **REGARDING 2011 & 2012 WATER USE** Case No. BC 325 201 16 Los Angeles County Waterworks District Trial Date: May 28, 2013 No. 40 v. Diamond Farming Co. 9:00 a.m. Time: 17 Kern County Superior Court Dept. No.: TBA Case No. S-1500-CV-254-348 Judge: Hon. Jack Komar 18 Wm. Bolthouse Farms, Inc., v. City of 19 Lancaster; Diamond Farming Co. v. City of 20 Lacncaster; Diamond Farming Co. v. City of Palmdate Water District. 21 Riverside County Superior Court Consolidated Action Nos. RIC 344 840, 22 RIC 344 436, RIC 344 668 Defendants. 23 24 25 26 Stipulation of Blum Trust & Public Water Suppliers For Phase 4 Trial 27

## STIPULATION

Blum Trust and the Public Water Suppliers who have signed this Stipulation, stipulate as follows:

- 1. This Stipulation is entered into only for the purpose of determining groundwater pumping during the calendar years of 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.
- 2. This Stipulation shall not preclude the Blum Trust from introducing in a later phase evidence to support its claimed water rights, including, without limitation, evidence of water use in years other than in 2011 and 2012.
- 3. 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 any applicable constitutional, statutory or decisional authority.
- 4. Subject to the reservations stated in paragraphs 1, 2, and 3, above, the parties to this Stipulation agree that the Blum Trust has not pumped groundwater in the Years 2011 and 2012.

Dated: May 21, 2013

Law Offices of Sheldon R. Blum

By:

Sheldon R. Blum, Esq.
Attorney For Blum Trust

Dated: May <u>J</u>, 2013 Best, Best & Krieger, LLP

JeffjeyW/Duhn, Esq.
Attorneys For Los Angeles County
Waterworks District No. 40

Stipulation of Blum Trust & Public Water Suppliers For Phase 4 Trial

| 1  | Dated: May, 2013                        | Lagerlof, Senecal, Gosney & Kruse   |
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| 2  | 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - |   |
| 3  |   | By:Thomas Bunn III, Esq.  |
| 4  |   | Attorneys For Palmdale Water District   |
| 5  | Dated: May <u>22</u> , 2013             | Charlton Weeks, LLP   |
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| 7  |   | By: Bradley T. Weeks, Esq.  |
| 8  |   | Attorneys For Quartz Hill Water District  |
| 9  | Dated: May, 2013                        | Lemieux & O'Neill   |
| 10 |   |   |
| 11 |   | By:<br>Wayne K. Lemieux, Esq.   |
| 12 |   | Attorneys For Littlerock Creek Irrigation District and Palm Ranch Irrigation District |
| 13 |   |   |
| 14 | Dated: May, 2013                        | Richards, Watson & Gershon  |
| 15 |   | By:   |
| 16 |   | By:<br>Steven R. Orr, Esq.<br>Attorneys For City of Palmdale                          |
| 17 | Dated: May, 2013                        | Murphy & Evertz, LLP  |
| 18 |   |   |
| 19 |   | By:<br>Douglas J. Evertz, Esq.  |
| 20 |   | Attorneys For City of Lancaster and   |
| 21 |   | Rosamond Community Services District  |
| 22 | Dated: May, 2013                        | California Water Service Company  |
| 23 |   | Dig.  |
| 24 |   | By:   |
| 25 |   |   |
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| 27 | Stipulation of Blum Trust & Pub         | olic Water Suppliers For Phase 4 Trial  |
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| 1      | Daled: May, 2013        | Lagerlof, Senecal, Gosney & Kruse                                     |
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| 2      |                         |   |
| 3<br>4 |                         | By:<br>Thomas Bunn III, Esq.<br>Attorneys For Palmdale Water District |
| 4      |                         | Attorneys For Fairnesis Water District                                |
|        | Dated: May, 2013        | Charlton Weeks, LLP   |
| 6      |                         | Dve   |
| 7      |                         | By:<br>Bradley T. Weeks, Esq.   |
| 8      |                         | Attorneys For Quartz Hill Water District                              |
| 9      | Dated: May, 2013        | Lemieux & O'Nelll   |
| 10     |                         | D.:   |
| 11.    |                         | By:<br>Wayne K. Lemieux, Esq.   |
| 12     |                         | Attorneys For Littlerock Creek Irrigation                             |
| 13     |                         | District and Palm Ranch Irrigation District                           |
| 14     | Dated: May, 2013        | Richards, Watson & Gershon  |
|        |                         |   |
| 15     |                         | By:<br>Steven R. Orr, Esg.  |
| 16     |                         | Attorneys For City of Palmdale  |
| 17     | Dated: May, 2013        | Murphy & Evertz, LLP  |
| 18     |                         |   |
| 19     |                         | Ву:   |
| 20     |                         | Douglas J. Evertz, Esq. Attorneys For City of Lancaster and           |
| 21     |                         | Rosamond Community Services District                                  |
| 22     | Dated: May, 2013        | California Water Service Company                                      |
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| 24     |                         | By: John Toolle   |
| 25     |                         | U   |
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| 27     | Stipulation of Blum Tru | st & Public Water Suppliers For Phase 4 Trial                         |
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