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PAMELLA ZAMRZLA, JOHNNY LEE
ZAMRZLA AND JEANETTE ZAMRZLA

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES – CENTRAL DISTRICT

Coordinated Proceeding,
Special Title (Rule 1550(b))

ANTELOPE VALLEY
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

**DECLARATION OF NICHOLAS R.
SHEPARD IN SUPPORT OF JOHNNY LEE
AND JEANETTE ZAMRZLA’S CLOSING
BRIEF**

I, Nicholas R. Shepard, declare as follows:

1. I am an attorney of law, duly licensed to practice before all the Courts in the State of California. I am a partner at Matheny Sears Linkert & Jaime, LLP., attorneys of record for Defendants JOHNNY ZAMRZLA, PAMELLA ZAMRZLA, JOHNNY LEE ZAMRZLA and JEANETTE ZAMRZLA. This declaration is based upon my personal knowledge and if called as a witness I could and would testify competently to the facts stated herein.

2. A two-day evidentiary hearing in this matter was held March 15-16, 2023, before the Honorable Judge Jack Komar. A true and correct copy of relevant portions of the transcripts of the hearing is attached hereto as Exhibit A.

1 I declare under penalty of perjury under the laws of the State of California that the foregoing
2 is true and correct of my own knowledge, and if called to do so, could and would competently
3 testify to the matters set forth herein.

4 Executed on this 14th day of April 2023 at Sacramento, California.

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7 NICHOLAS R. SHEPARD
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EXHIBIT A

Transcript of the Proceedings of:

ANTELOPE VALLEY GROUNDWATER CASES

March 15, 2023



I M A G I N E
R E P O R T I N G

1 about the Antelope Valley water litigation prior to --
2 and my -- let me -- let me rephrase that.

3 Did you ever see any sort of notice or
4 notification or anything like that about the Antelope
5 Valley groundwater litigation prior to December of 2015?

6 A. No, absolutely not.

7 Q. When was the first time that you understood
8 that your water rights were potentially affected by the
9 Antelope Valley water litigation?

10 A. Well, I got a notice obviously and it was
11 dated June. I actually got it mid or late July of 2018,
12 but that was from the Watermaster, the mailing that said
13 I'm illegally pumping water. But I actually got a -- I
14 got a slight notice to don't plant in December of 2017,
15 that there could be some problems.

16 Q. And tell me about that. Who told you that?

17 A. One of the Van Dams.

18 Q. Which Van Dam?

19 A. Nick. Nick Van Dam.

20 Q. And what did he --

21 A. He saw that we were disking. He talked to --
22 I think he talked to a fellow that was going to plant
23 for me. He knew that we were putting numbers together
24 to buy seed. And he said, Do you know there's some
25 issues going around about the water? And if I were
26 you --

27 I said, no, but what are you talking about?

28 And he said, you know, they're -- they're

1 starting to restrict water. If I were you, I wouldn't
2 plant and then not have water to take care of the
3 expense you put into the ground.

4 And I said, Really?

5 And he said, Yeah, it looks like you're
6 getting ready to.

7 I said, I was. This is like December of 2017.

8 Q. Just to be clear, the first time that you
9 had -- you actually understood or got some sort of
10 notice that you received was the Watermaster's letter in
11 July of 2018?

12 A. 2018.

13 Q. What did you do when you received that letter?

14 A. Within a week I had an attorney named Bob
15 Armstrong, but -- he was my representative at the time.
16 I started making phone calls. I, all of the sudden,
17 found out, jeez, nobody's available to do water.
18 They're all taken up.

19 And a friend of mine that's in the hay
20 business happened to be at my ranch, and he said, I hear
21 they're after you about water.

22 And I said, What do you know about that?

23 And he said, Do you have an attorney yet?

24 I said, No, I'm looking for one.

25 He ran to his truck. He came back. I took a
26 phone picture of the business card in his hand, and the
27 next day I called Bob Brumfield in Bakersfield, and I
28 had him on it and had him calling the Watermaster

1 attorney.

2 Q. And so Mr. Brumfield --

3 A. I mean the date was within a week.

4 Q. That you retained counsel?

5 A. From the day I got the letter.

6 THE COURT: Okay. We're going to stop for
7 lunch at this point. It's 12:00 o'clock, so let's
8 return at 1:30.

9 THE WITNESS: Thank you, sir.

10 THE COURT: Thank you, sir.

11 (Whereupon, the lunch recess was taken at 12:02 p.m.)

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REPORTER'S CERTIFICATE

STATE OF CALIFORNIA)

) ss.

LOS ANGELES COUNTY)

I, MARY E. ARGYROPOULOS, a Certified Shorthand Reporter in and for the State of California, hereby certify:

That on March 15, 2023, I fully, truly, and correctly took down in shorthand writing all of the testimony given in said court and cause;

That I thereafter fully, truly, and correctly caused the same to be transcribed into typewriting;

That the foregoing pages 1-202, inclusive, is a full, true, and correct transcript of my shorthand notes taken at said time and place therein named.

DATED: 28th day of March, 2023.



MARY E. ARGYROPOULOS
CSR NO. 9775, RMR, CRR

Transcript of the Proceedings of:

ANTELOPE VALLEY GROUNDWATER CASES

March 16, 2023



I M A G I N E
R E P O R T I N G

1 stamp.

2 Q. And that -- has that been your pattern and
3 practice for many years?

4 A. Yes.

5 Q. Any time you get something that you deem to be
6 an important piece of mail, you follow that practice;
7 you date-stamp it, you staple it to the envelope?

8 A. Absolutely.

9 Q. And follow up and address it, correct?

10 A. Correct.

11 Q. In fact, you received a letter from the
12 Watermaster in 2018, correct?

13 A. Correct.

14 Q. Did you stamp that letter received with a
15 date?

16 A. Yes, we did.

17 Q. And why did you do that?

18 A. To document the date it was received, and we
19 stapled it to the envelope. And that, in particular, I
20 remember that when Johnny later, when we were reviewing
21 things, that the letter was dated in June and received
22 over a month later in July. And you could tell from the
23 mailing date that it was mailed a month later than the
24 letter was dated.

25 Q. And did you do that also because you saw that
26 letter and it appeared to be an important document?

27 A. Yes.

28 Q. So that would follow your pattern and practice

1 letter?

2 Q. Sure.

3 A. Because Mr. Parton suggested yesterday that we
4 retained Mr. Brumfield because we knew that he
5 represented small pumpers the minute we got this letter,
6 and we didn't know anything about Mr. Brumfield.

7 But this letter says: It is our understanding
8 that you may be pumping groundwater from the Antelope
9 Valley Adjudicated Basin. If you do not have a right to
10 do so under the terms of the judgment, the Watermaster
11 is required by the Court to stop all unauthorized
12 pumping. And this is our notice to you that you must
13 comply.

14 That section of the judgment provides a
15 process for non-parties to intervene in the judgment to
16 become a party, and to then seek the right to produce
17 groundwater from the adjudicated basin. Intervening to
18 become a party actually has a number of potential
19 advantages. And then it goes on to say the process to
20 intervene.

21 And so after we had retained Mr. Brumfield to
22 inquire about so what do we do next and what is our
23 responsibility -- and there was some time, you know,
24 went between this letter, Brumfield's initial attempt to
25 contact Mr. Parton. We got a timeline that shows the
26 time that went by between Mr. Parton's responses to our
27 counsel. But following this letter was the request to
28 produce -- to provide to them all of our historical

1 water production, and we complied with everything the
2 Watermaster requested.

3 And after we had completed all of that, we got
4 the -- through counsel the notice that, oh, you can't
5 intervene. You're already a party. You're on a small
6 pumper list. That's the first we heard of the small
7 pumper list.

8 And shortly after that, we got a bill from the
9 Watermaster for water that he said was pumped on our
10 80 acres in 2018, which we had not done. And we
11 provided the evidence from Edison that there was no
12 power to that well.

13 Q. That -- the bill you just mentioned, how much
14 was that bill for?

15 A. \$273,000.

16 Q. Has it been acknowledged that bill is
17 erroneous at this point?

18 A. It has been acknowledged, yes, by Mr. Parton.

19 Q. Is that bill still publicly posted for anyone
20 in the public to see?

21 A. Yes, it is.

22 Q. So anyone in the public might see that bill
23 and believe that you actually owe \$273,000 when you
24 don't?

25 A. Yes.

26 And Mr. Parton's claim for actual money based
27 on our actual water usage, which is that part, you know,
28 on the 40 acres is like 28,000, I think. And we've

1 since early '80s.

2 THE COURT: Okay. All right. Thank you.

3 THE WITNESS: Okay.

4 THE COURT: Anything else from anybody?

5 MR. SHEPARD: No, your Honor.

6 THE COURT: All right. You may step down.

7 THE WITNESS: Thank you.

8 THE COURT: Thank you very much.

9 So Mr. Shepard, your next witness.

10 MR. SHEPARD: Yes, I'd like to call

11 Johnny Lee Zamrzla.

12 THE COURT: Come forward, sir, and be sworn.

13 Swear the witness.

14 THE CLERK: Could you please raise your right
15 hand.

16 JOHNNY LEE ZAMRZLA,

17 called as a witness on behalf of the Zamrzlas, was first
18 duly sworn, examined, and testified as follows:

19 THE WITNESS: I do.

20 THE CLERK: Thank you.

21 THE COURT: State your full name for the
22 record, please.

23 THE WITNESS: John Lee Zamrzla, Z-A-M-R-Z-L-A.

24 THE COURT: And where do you reside?

25 THE WITNESS: 8165 West Avenue D8, Lancaster,
26 California, 93536.

27 THE COURT: Okay, Counsel.

28

1 DIRECT EXAMINATION

2 BY MR. SHEPARD:

3 Q. Good afternoon, Mr. Zamrzla.

4 A. Good afternoon.

5 Q. You just stated your address. How long have
6 you lived at that address?

7 A. I believe we moved in 2009.

8 Q. And how long have you actually owned that
9 property?10 A. I believe we acquired it 2005, somewhere in
11 that neighborhood.

12 Q. Who lives there with you on that property?

13 A. My wife Jeanette.

14 Q. And she's here today?

15 A. Correct.

16 Q. And have you lived continuously at that
17 address since you moved into the house?

18 A. We have.

19 Q. And how many acres -- when you obtained that
20 property in the mid, you know, 2000s, how many acres was
21 the property?

22 A. The original was approximately 10 acres.

23 Q. And did you later obtain additional land?

24 A. Correct.

25 Q. And how much -- how many acres was that?

26 A. An additional 10 acres.

27 Q. Adjacent to the first 10 acres?

28 A. Correct.

1 Q. When did you obtain that additional 10 acres?

2 A. I believe around 2015, '16, if I recall.

3 Q. How do you get water for that -- for your
4 properties?

5 A. The well off of the original parcel.

6 Q. A well on the original 10 acres?

7 A. Correct.

8 Q. And that also now serves the other 10 acres?

9 A. Correct.

10 Q. There's no second well on the other 10 acres?

11 A. No, sir.

12 Q. And at times in this litigation we've referred
13 to that well as the "pasture well." Is that your
14 understanding as well?

15 A. Yes, sir.

16 Q. So if I refer to it or the other attorneys
17 refer to it as the "pasture well," you understand that
18 to be the well on your property, correct?

19 A. Correct.

20 Q. And just generally, what -- what uses do you
21 put water to on your property?

22 A. It supplies the house and any of the trees and
23 the livestock, the animals that are there.

24 Q. When you say it supplies the livestock, do you
25 mean drinking water or do you mean other sorts of uses
26 for the water for the livestock?

27 A. Both drinking water and we used it to irrigate
28 the pasture to grow some -- some grass in there.

1 Q. Grass for the livestock to consume?

2 A. Correct.

3 Q. Have you grown any crops apart from grass for
4 the livestock on your property?

5 A. Since I've been there, some Sudangrass on the
6 adjacent 10 acres and then some pasture grass. Maybe
7 some grain hay at one time.

8 Q. And what was the purpose of growing the
9 Sudangrass or the other pasture grass?

10 A. For the livestock.

11 Q. For your livestock as well?

12 A. Correct.

13 Q. Do you have an understanding as to how much
14 water you were using each year since 2008 on that
15 property?

16 A. Somewhat, yes.

17 Q. Do you have an estimate about how much water
18 in a given year you think, on average, you were using?

19 A. Well, the pasture, we -- we probably did
20 something around 25 to 30 acres depending on what else
21 we were trying to do. The 10 acres, I think the
22 Sudangrass, we were in excess of 30- to 40-acre feet.
23 That was a one-cutting deal.

24 Q. That was only on one occasion you did that on
25 the --

26 A. Correct.

27 Q. -- the other parcel?

28 THE COURT: Are you talking about acre-feet of

1 Exhibit 11 into evidence.

2 THE COURT: You'd what?

3 MR. SHEPARD: Move Exhibit 11 into evidence.

4 MR. PARTON: No objection.

5 THE COURT: Any objection?

6 MS. RYAN: No.

7 MR. KUHS: No.

8 THE COURT: That will be admitted.

9 (Exhibit 11 admitted into evidence.)

10 BY MR. SHEPARD:

11 Q. Mr. Zamrzla, if you could turn to Exhibit 26
12 in the same binder.

13 And I'll just represent to you that this
14 exhibit was previously admitted into evidence. It's an
15 aerial Google Earth image dated July 15th, 2011.

16 Do you see your property on this photograph?

17 A. Yes.

18 Q. Can you describe to me where your property is
19 on this photograph?

20 A. The green rectangle portion at the corner 80th
21 and D8 is the pasture, and further to the west is the
22 house. Directly to the north of the green is the
23 additional 10 acres; it's brown.

24 Q. So just to orient ourselves, going more or
25 less down the center from the top to the bottom is a
26 yellow roadway which would be 80th, right?

27 A. Correct.

28 Q. And at that -- the intersection closest to the

1 bottom of this photo, the northwest corner we'll call
2 it, there's a section, a rectangular section, of green.
3 That's your pasture?

4 A. Correct.

5 Q. And then just to the left of that, there's a
6 structure with a red roof, it looks like, at your home?

7 A. Correct.

8 Q. And then the other 10 acres you've mentioned,
9 would that be the brown rectangle directly above the
10 pasture in the home there?

11 A. Correct.

12 Q. About the same size, right? Both parcels are
13 10 acres?

14 A. Yes, sir.

15 Q. So again, this photo is dated July 15th, 2011.
16 Your pasture there appears to have some green in it. Do
17 you have a recollection of what you would have been
18 growing in your pasture at that time?

19 A. It would have been a pasture of grass. That
20 was the only thing that we planted in that area.

21 Q. For your livestock to consume?

22 A. Correct.

23 Q. Now, if you could turn to the next exhibit,
24 Exhibit 27. It's another previously admitted exhibit,
25 Google Earth photo dated December 3rd, 2011.

26 Do you recognize your property on this as
27 well?

28 A. Yes.

1 Q. And just -- actually, just to clarify, just so
2 there's no confusion, we talked about the other 10-acre
3 parcel. As of 2011, you didn't own that parcel yet; is
4 that correct?

5 A. No, I don't believe we did.

6 Q. So in this one, again, we see the pasture
7 there. It appears to my eyes to be less green. Do you
8 have a recollection of what, if anything, you would have
9 been growing in December of 2011?

10 A. It would have still been the grass there.
11 That was a permanent pasture. It would go dormant and
12 come back.

13 Q. If you could flip to the next exhibit,
14 Exhibit 28.

15 A. Okay.

16 Q. Google Earth aerial footage dated August 25th,
17 2012. Again, your pasture there appears in green.
18 Same -- same thing as before?

19 A. Yes, sir.

20 Q. Growing pasture grass?

21 A. Correct.

22 THE COURT: Comparing 27 and 28, obviously 28
23 looks bigger than 27, doesn't it -- I'm sorry. I was
24 looking at 29, which he hasn't got to yet. He will.

25 THE WITNESS: Okay.

26 THE COURT: Go ahead.

27 BY MR. SHEPARD:

28 Q. And if you could turn to Exhibit 31, which

1 again was previously admitted into evidence, a Google
2 Earth photo dated April 11th, 2015.

3 Do you see your property on this -- this photo
4 as well?

5 A. Mine says --

6 Q. 31.

7 Sorry, 30. My mistake.

8 A. Okay. 30.

9 April 11th, 2015.

10 Q. Now, again, we see the pasture green. Same
11 thing would have been going on at that time?

12 A. Correct.

13 Q. And now the 10-acre parcel to the north --
14 directly to the north there appears to have the start of
15 some green in it.

16 What was going on? Did you own that parcel as
17 of this date?

18 A. I believe so.

19 Q. And so were you starting to grow something
20 there --

21 A. It appears --

22 Q. -- as of April, 2015?

23 A. It appears that we are, yes.

24 Q. And, again, what would that have been?

25 A. I believe it would have been either some type
26 of grass, either Sudan or grain hay.

27 Q. For livestock purposes?

28 A. I'm sorry?

1 Q. For your livestock?

2 A. Correct.

3 Q. And is it your understanding that in 2015 you
4 would have used in excess of 25 acre-feet of water?

5 A. It is.

6 Q. We talked about some prior years, 2011. Would
7 you have used more than 25 acre-feet of water in 2011?

8 A. I believe so.

9 Q. Do you have an idea of how much water you used
10 in 2013? Would you have used in excess of 25 acre-feet
11 in 2013?

12 A. I believe so. We put those records together.
13 I just don't have them in front of me.

14 Q. In the years from 2015 forward when you had
15 the additional 10 acres, were you using in excess of
16 25 acre-feet every year from then on?

17 A. Yes, sir, I believe so.

18 Q. Did you stop using that much water at some
19 point?

20 A. I don't believe so.

21 Q. In 2018, did you use less water?

22 A. In 2018, we stopped farming that 10 acres and
23 watering the pasture.

24 Q. And why was that?

25 A. We received the Watermaster's letter.

26 Q. If you could turn to Exhibit 23 in the same
27 binder.

28 Mr. Zamrzla, have you ever seen this document

1 before?

2 A. I have.

3 Q. Did you ever -- when was the first time you
4 saw this document?

5 A. I believe it was shown to us by Mr. Brumfield,
6 or during our meetings with you as well.

7 Q. That would have been after 2018 and forward
8 after you received the Watermaster's letter?

9 A. Correct.

10 Q. Had you ever seen this document prior to
11 December 2015?

12 A. No, sir.

13 Q. Have you ever received a document -- this
14 document or really any document like it in the mail
15 prior to 2015?

16 A. No.

17 Q. Were you ever personally served with notice of
18 the Antelope Valley groundwater adjudication?

19 A. No.

20 Q. Did you ever read a notice of any kind in any
21 newspaper concerning the Antelope Valley groundwater
22 adjudication prior to December 2015?

23 A. No, I did not.

24 Q. When was the first time you heard about the
25 existence of a small pumper class?

26 A. From Mr. Brumfield sometime after receiving
27 the Watermaster's letter.

28 Q. Would that have been 2018 or 2019?

1 A. I believe after 2019, somewhere right in
2 there.

3 Q. Were you aware that there was -- just
4 generally, were you aware that there was a water
5 litigation going on at any point prior to December 2015?

6 A. Prior to December -- I'm sure -- I'm sure I
7 knew something.

8 Q. What -- what had you heard about the water
9 litigation going on?

10 A. That there was litigation going on and that
11 there -- there was ongoing discussions with the big
12 farmers and the water survey -- suppliers trying to work
13 out their water issues.

14 Q. Did you ever have any conversations with
15 anyone you knew -- again, prior to December of 2015,
16 about the water litigation?

17 A. Yes, I'm sure I have.

18 Q. Do you recall in any of those conversations
19 being told that it would affect you?

20 A. I do not.

21 Q. Do you recall in any of those conversations at
22 any point prior to December 2015 anyone telling you that
23 it was in your best interest to get involved in that
24 litigation?

25 A. I do not.

26 Q. Did you have any understanding prior to
27 December of 2015 that that water litigation could affect
28 your right to pump water in any way?

1 A. I did not, no.

2 Q. Can you turn to Exhibit 21, and specifically
3 Tab C of Exhibit 21 which was previously admitted.

4 A. C?

5 Q. Yeah, 21C. And this is the Judgment Approving
6 the Small Pumper Class Action Settlements.

7 If you flip about seven pages in, you'll see
8 an Exhibit A there, List of Known Small Pumper Class
9 Members for Final Judgment.

10 Have you seen this list before?

11 A. I have.

12 Q. Have you reviewed this list?

13 A. I've looked through it.

14 Q. Have you -- have you looked through it and
15 looked to see if your name is on this list?

16 A. I have. I have not seen our name.

17 Q. Is your wife's name on this list, Jeanette?

18 A. No. No.

19 Q. Is your address on this list?

20 A. Not that I've seen.

21 Q. Has anyone ever told you that you are a small
22 pumper class member on the list of known small pumpers?

23 A. Has anyone ever told me that I am on the list?

24 Q. Right.

25 A. No.

26 Q. So just to be clear, at any point prior to
27 December 2015, did you receive any notice, any service
28 of process, any sort of legal document telling you that

1 you were subject to the Antelope Valley groundwater
2 litigation?

3 A. I did not.

4 Q. So we discussed a few minutes back that in
5 2018 you received a letter from the Watermaster,
6 correct?

7 A. Correct.

8 Q. So when you received that letter, what did you
9 do at that point?

10 A. Contacted my parents.

11 Q. And what did -- what did they tell you?

12 A. We discussed trying to get an attorney and
13 trying to see what we could do to move forward and get
14 the issue resolved.

15 Q. So you and your dad went out and found an
16 attorney?

17 A. We discussed it. We were both making phone
18 calls trying to get -- get some advice on who we might
19 reach out to. My dad did more of that than I did.

20 Q. And actually, I don't know that we established
21 this, so I'll do that real quick.

22 When you say your "dad," we're talking about
23 Johnny Zamrzla, correct?

24 A. Correct.

25 Q. And your mom is Pamella Zamrzla?

26 A. That's correct.

27 Q. So once you -- how quickly did you retain an
28 attorney after receiving that letter?

1 A. Very quickly. I believe a week or two.

2 Q. And then from there, what actions were taken
3 either by you or your attorney to address that letter?

4 A. I believe Mr. Brumfield contacted the
5 Watermaster, Mr. Parton, and tried to begin the process
6 of working our way through it.

7 Q. And you've been actively litigating --
8 attempting to litigate the issue of your water rights
9 ever since?

10 A. Correct.

11 MR. SHEPARD: Thank you, Mr. Zamrzla.

12 THE COURT: Okay. Cross.

13 CROSS-EXAMINATION

14 BY MS. RYAN:

15 Q. Mr. Zamrzla, you testified that you're sure
16 you had discussions with people about the adjudication
17 before 2015, correct?

18 A. Yes.

19 Q. One of those conversations was with
20 Delmar Van Dam, correct?

21 A. Yes.

22 Q. And in those conversations while the
23 groundwater litigation was pending, Delmar Van Dam told
24 you to continue doing what you were doing and you would
25 get a water right in the end, right?

26 A. Yes.

27 Q. Your understanding from your conversation with
28 Delmar Van Dam was that whatever amount of water people

1 agreed to, whether it was 40 percent, 50 percent, that
2 would automatically fall into the 40 to 50 percent range
3 of water that you had been using, correct?

4 A. Something along those lines, yes.

5 Q. That you would get a percentage, some
6 percentage of your water rights, correct?

7 A. Correct.

8 Q. Your dad was also present during that
9 conversation, right?

10 A. Yes.

11 Q. You also talked to Gary Van Dam on different
12 occasions to check in on where the litigation was going,
13 correct?

14 A. At some point, yes.

15 Q. And you testified to these conversations in
16 your deposition, correct?

17 A. I'm sorry?

18 Q. You testified to these conversations in your
19 deposition, correct?

20 A. I believe so.

21 Q. You took a deposition on August 17th, 2022?

22 A. That sounds correct.

23 Q. And in that deposition you swore under oath to
24 tell the truth, correct?

25 A. Correct.

26 Q. I'd like to read you a statement from the
27 March -- Zamrzlas' brief, the March 15th through 16th
28 evidentiary hearing brief that was filed with this Court

1 incorrect.

2 Q. Well, I want your memory to be clear, sir. So
3 what is -- when did you acquire the property, Parcel 28?

4 A. 2007.

5 Q. You also testified that you acquired the
6 additional 10 acres in 2015 or 2016?

7 A. Yes.

8 Q. You did not acquire them in 2014?

9 A. I believe it was '15. It could have been '14.

10 Q. There's another binder, it's SPW exhibits. If
11 you could open that and please turn to Exhibit 51,
12 please.

13 THE COURT: It would be helpful if you moved
14 the microphone a little bit further away.

15 THE WITNESS: I'm sorry, turn to what?

16 BY MS. RYAN:

17 Q. Exhibit 51, please.

18 A. Okay.

19 Q. Please take a few minutes to look through
20 Exhibit 51.

21 Do you recognize Exhibit 51?

22 A. I do.

23 Q. What is it?

24 A. Appears to be a deed we completed on
25 February 19th, 2014.

26 Q. And this is the deed for Parcel 27, correct?

27 A. Yes.

28 MS. RYAN: Your Honor, I would like to move

1 THE COURT: Have a seat, please, and state
2 your full name.

3 THE WITNESS: Okay. Jeanette Caroline
4 Zamrzla, 8165 West Avenue D8, Lancaster, California,
5 93536.

6 THE COURT: Thank you.

7 THE WITNESS: You're welcome.

8 DIRECT EXAMINATION

9 BY MR. SHEPARD:

10 Q. Good afternoon, Mrs. Zamrzla. How are you?

11 A. Good. Thank you.

12 Q. Is your husband Johnny Lee Zamrzla?

13 A. Yes.

14 Q. And the address you just gave, that's the
15 residence that you live at with Johnny Lee Zamrzla?

16 A. Yes.

17 Q. And how long have you lived at that address?

18 A. Sixteen years now -- well, we closed occupancy
19 in 2009, so we had moved in just before that.

20 Q. Do you recall exactly when you moved in --

21 A. No.

22 Q. -- specifically?

23 A. I know it took us two and a half years to
24 build.

25 Q. Obviously, you've heard a lot the last couple
26 days about the Antelope Valley groundwater litigation.
27 Had you ever heard of the Antelope Valley groundwater
28 litigation prior to December of 2015?

1 A. No.

2 Q. Had you ever heard anything about water
3 litigation or a water lawsuit or anything like that
4 prior to December of 2015?

5 A. No.

6 Q. Did you ever receive in the mail any sort of
7 notice of any kind talking about groundwater litigation
8 or telling you that you were potentially subject to
9 groundwater litigation?

10 A. No.

11 Q. Anybody ever come to your house, your place of
12 business, personally serve you with any papers, legal
13 documents of any kind about groundwater litigation?

14 A. No.

15 Q. Did you ever read anything in the newspaper,
16 article or a notice of any kind, about groundwater
17 litigation prior to October -- or December of 2015?

18 A. No.

19 Q. Did you have any idea at all that there was
20 water litigation going on prior to when the Watermaster
21 sent a letter in 2018?

22 A. No.

23 Q. When was the first time you heard about the
24 water adjudication?

25 A. When the letter came from the Watermaster.

26 Q. There's been some discussion about a
27 declaration you signed. There was a declaration you
28 signed dated November 11th, 2021 titled the Declaration

REPORTER'S CERTIFICATE

STATE OF CALIFORNIA)

) ss.

LOS ANGELES COUNTY)

I, MARY E. ARGYROPOULOS, a Certified Shorthand Reporter in and for the State of California, hereby certify:

That on March 16, 2023, I fully, truly, and correctly took down in shorthand writing all of the testimony given in said court and cause;

That I thereafter fully, truly, and correctly caused the same to be transcribed into typewriting;

That the foregoing pages 203-384, inclusive, is a full, true, and correct transcript of my shorthand notes taken at said time and place therein named.

DATED: 28th day of March, 2023.



MARY E. ARGYROPOULOS
CSR NO. 9775, RMR, CRR