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Angeles World Airports  
12

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
14 **COUNTY OF LOS ANGELES**  
15

16 Coordination Proceeding  
17 ANTELOPE VALLEY GROUNDWATER  
CASES,  
18 \_\_\_\_\_  
Los Angeles County Waterworks District No.  
19 40 v. Diamond Farming Co.  
20 Los Angeles County Waterworks District No.  
40 v. Diamond Farming Co.  
21 Wm Bolthouse Farms, Inc. v. City of  
22 Lancaster  
23 Diamond Farming Co. v. City of Lancaster  
24 Diamond Farming Co. v. Palmdale Water  
District,  
25 \_\_\_\_\_  
26 AND RELATED ACTIONS  
27  
28

Judicial Council Coordination  
Proceeding No. 4408  
**STIPULATION REGARDING  
ZAMRZLAS' HEARING, DISCOVERY  
AND BRIEFING SCHEDULE;  
[PROPOSED] ORDER**  
The Hon. Jack Komar, Dept. 17  
Santa Clara Case No. 105 CV 049053  
Riverside County Superior Court  
Lead Case No. RIC 344436  
Case No. RIC 344668  
Case No. RIC 353840  
Los Angeles Superior Court Case  
No. BC 325201  
Kern County Superior Court Case  
No. S-1500-CV-254348

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**STIPULATION**

The City of Los Angeles (Los Angeles World Airports), Grimmway Enterprises, Palmdale Water District, County Sanitation Districts of Los Angeles County Nos. 14 and 20 (collectively, “Settling Parties”), Antelope Valley Watermaster, and Johnny Zamrzla, Pamella Zamrzla, Johnny Lee Zamrzla and Jeanette Zamrzla (“Zamrzlas”), by and through their respective attorneys of record (individually, “Party” and collectively, “Parties”), stipulate and agree as follows:

**RECITALS**

A. The Court granted the Settling Parties’ ex parte application to continue the May 3, 2022, hearing on the Zamrzlas’ Motions to Set Aside or Modify the Judgment (“Motions”) to 9 a.m. on August 9, 2022.

B. The Court directed the Parties to meet and confer and to inform the Court of the outcome of their meet-and-confer efforts on the following: (1) hearing date and length; (2) venue; (3) discovery and briefing deadlines; and (4) court reporter.

C. The Parties met and conferred on the issues designated by the Court and reached agreement as set forth herein.

**IT IS HEREBY STIPULATED AND AGREED THAT:**

1. **Hearing Date and Venue.** The original August 9, 2022, hearing date on the Motions is vacated and rescheduled to start at 9 a.m. on Tuesday, August 23, 2022. The hearing is estimated to last two days and will take place in Department 17 of the Santa Clara County Superior Court located at 161 North First Street, San Jose, California 95113.

2. **Scope.** The scope of issues for discovery and to be tried at the hearing will be limited to whether the Zamrzlas are bound by the Judgement and Physical Solution entered on December 28, 2015, as raised by the Zamrzlas’ motions. The Zamrzlas’ claims to production rights are deferred to a later hearing.

3. **Deadlines.** Based on an August 23, 2022, hearing date on the Motions:

a. Opposition briefs shall be filed and served by the Settling Parties and Watermaster on or before Friday, August 5, 2022.

b. Reply briefs shall be filed and served by the Zamrzlas on or before Monday,

1 August 15, 2022.

2 4. **Briefing and Page Limits.** The Settling Parties may file one opposition of 30 pages  
3 or less. The Zamrzlas may file one reply to the Settling Parties' opposition of 20 pages or less. The  
4 Watermaster may file separate briefing responding to the Zamrzlas' claims within statutory page  
5 limits. The Zamrzlas may file a reply to the Watermaster's oppositions within statutory page limits.

6 5. **Discovery.**

7 a. The Parties are permitted to conduct discovery as to any other party, per the  
8 Code of Civil Procedure and subject to the terms of this Stipulation.

9 b. Scope of Discovery. Discovery is limited to the scope of the issues to be  
10 addressed at the August 23, 2022 hearing, as described above in Section 2.

11 c. Discovery cutoff. Based on an August 23, 2022, hearing date on the Motions  
12 and Code of Civil Procedure, the discovery cutoff will be on Monday, July 25, 2022.

13 d. Depositions. The Parties agree to review and to provide signed deposition  
14 transcripts within 10 days from receipt. Depositions of the Zamrzlas will take place in Sacramento,  
15 California, unless otherwise agreed by the Parties.

16 e. Written discovery. The Parties agree to shorten the time for written discovery  
17 responses to 20 days from service of discovery requests.

18 f. Disputes. If there are any discovery disputes that the Parties cannot settle  
19 among themselves, the Parties will ask the Court's clerk to schedule a teleconference with the Court  
20 to resolve the dispute informally.

21 g. Extending discovery and merits briefing and hearing schedule. If any party  
22 determines more time is needed for discovery, that party shall file with the Court a written request  
23 for an extension showing good cause.

24 6. **Experts.** Electronic exchange of expert disclosures shall be made by 5:00 p.m. on  
25 Monday, June 20, 2022. Electronic exchange of rebuttal experts shall be made by 5:00 p.m. on  
26 Monday, July 11, 2022. Any expert testimony or document shall be limited to the issues set for the  
27 August 23, 2022, hearing, as described in Section 2, above. Expert disclosures will be made  
28 according to the California Code of Civil Procedure. Expert depositions can be conducted on 7 days

1 electronic notice. Expert deposition transcript review and signature must be completed within 10  
2 days of receipt.

3           7.       **Court Reporter.** The Parties will provide for a court reporter for the hearing, and  
4 will equally share the cost among the Settling Parties (1/3), Watermaster (1/3) and the Zamrzlas  
5 (1/3). If any additional party decides to separately oppose the Zamrzlas' Motions, the cost will be  
6 further divided equally among the Parties and any additional party.

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DATED: May 13, 2022

KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD  
A Professional Corporation

By:  For \_\_\_\_\_  
Eric N. Robinson  
Jenifer N. Ryan  
Attorneys for CITY OF LOS ANGELES and  
LOS ANGELES WORLD AIRPORTS

DATED: May 13, 2022

LEBEAU THELEN LLP

By:  For \_\_\_\_\_  
Robert G. Kuhs  
Attorneys for GRIMMWAY ENTERPRISES

DATED: May 13, 2022

LAGERLOF, LLP

By:  For \_\_\_\_\_  
Thomas S. Bunn  
Attorneys for PALMDALE WATER DISTRICT

1 DATED: May 13, 2022

ELLISON, SCHNEIDER, HARRIS & DONLAN LLP

2

3

By:  For

4

Christopher M. Sanders  
Attorneys for COUNTY SANITATION  
DISTRICTS OF LOS ANGELES COUNTY NOS.  
14 AND 20

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6

7 DATED: May 13, 2022

PRICE, POSTEL & PARMA LLP

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9

By:  For

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Craig Parton  
Attorneys for ANTELOPE VALLEY  
WATERMASTER

11

12

13 DATED: May \_\_\_\_, 2022

MATHENY SEARS LINKERT & JAIME, LLP

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By: \_\_\_\_\_

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Nicholas R. Shepard  
Attorneys for JOHNNY ZAMRZLA, PAMELLA  
ZAMRZLA, JOHNNY LEE ZAMRZLA AND  
JEANETTE ZAMRZLA

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DATED: May \_\_\_\_, 2022

ELLISON, SCHNEIDER, HARRIS & DONLAN LLP

By: \_\_\_\_\_  
Christopher M. Sanders  
Attorneys for COUNTY SANITATION  
DISTRICTS OF LOS ANGELES COUNTY NOS.  
14 AND 20

DATED: May \_\_\_\_, 2022

PRICE, POSTEL & PARMA LLP

By: \_\_\_\_\_  
Craig Parton  
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WATERMASTER

DATED: May 13, 2022

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JEANETTE ZAMRZLA

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**[PROPOSED] ORDER**

The Court having read the foregoing Stipulation, and good cause appearing, **IT IS SO ORDERED.**

DATED: May \_\_\_\_, 2022

\_\_\_\_\_  
Jack Komar

1 **Judicial Council Coordination Proceeding No. 4408**  
2 **For Filing Purposes Only: Santa Clara County Case No.: 1-05-CV-049053**

3 **PROOF OF SERVICE**

4 **STATE OF CALIFORNIA, COUNTY OF SACRAMENTO**

5 At the time of service, I was over 18 years of age and not a party to this action. I am  
6 employed in the County of Sacramento, State of California. My business address is 1331 Garden  
7 Hwy, 2nd Floor, Sacramento, CA 95833.

8 On May 13, 2022, I served true copies of the following document(s) described as  
9 **STIPULATION REGARDING ZAMRZLAS' HEARING, DISCOVERY AND BRIEFING**  
10 **SCHEDULE; [PROPOSED] ORDER** on the interested parties in this action as follows:

11 **BY ELECTRONIC TRANSMISSION:** By submitting an electronic version of the  
12 document(s) to the parties, through the user interface at avwatermaster.org.

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

15 Executed on May 13, 2022, at Sacramento, California.

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17 \_\_\_\_\_  
18 Terri Whitman