

1 ERIC N. ROBINSON, State Bar No. 191781
erobinson@kmtg.com

2 STANLEY C. POWELL, State Bar No. 254057
spowell@kmtg.com

3 JENIFER N. RYAN, State Bar No. 311492
jryan@kmtg.com

4 KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD
A Professional Corporation
5 1331 Garden Highway, 2nd Floor
Sacramento, California 95833
6 Telephone: (916) 321-4500
Facsimile: (916) 321-4555

7 HYDEE FELDSTEIN SOTO, State Bar No. 106866
8 Los Angeles City Attorney

JULIE CONBOY RILEY, General Counsel, Water and Power

9 BRIAN C. OSTLER, General Counsel, Los Angeles World Airports

NARGIS CHOUDHRY, Deputy City Attorney, Los Angeles World Airports

10 Attorneys for Defendant CITY OF LOS ANGELES and
LOS ANGELES WORLD AIRPORTS

11 Attorneys for Cross-Defendants City of Los
12 Angeles and Los Angeles World Airports

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

14 **COUNTY OF LOS ANGELES**

15
16 Coordination Proceeding

17 ANTELOPE VALLEY GROUNDWATER
18 CASES,

19 Los Angeles County Waterworks District No.
40 v. Diamond Farming Co.

20 Los Angeles County Waterworks District No.
21 40 v. Diamond Farming Co.

22 Wm Bolthouse Farms, Inc. v. City of
23 Lancaster

Diamond Farming Co. v. City of Lancaster

24 Diamond Farming Co. v. Palmdale Water
25 District,

26 AND RELATED ACTIONS
27

Judicial Council Coordination
Proceeding No. 4408

LEAD CASE: LASC Case No. BC 325201

**SETTLING PARTIES AND
WATERMASTER'S JOINT REBUTTAL
WITNESS AND EXHIBIT LIST**

Date: March 15, 2023
Time: 9:00 a.m.

The Hon. Jack Komar, Dept. 17
Santa Clara Case No. 105 CV 049053

Riverside County Superior Court
Case No. RIC 344436
Case No. RIC 344668
Case No. RIC 353840

Kern County Superior Court Case
No. S-1500-CV-254348

1 The City of Los Angeles (Los Angeles World Airports), Grimmway Enterprises, Palmdale
 2 Water District, County Sanitation Districts of Los Angeles County Nos. 14 and 20 (collectively,
 3 “Settling Parties”), and Antelope Valley Watermaster (“Watermaster”), respectfully submit the
 4 following joint list of rebuttal witnesses and exhibits.

5 **I. REBUTTAL WITNESS LIST**

- 6 1. Jeffrey Dunn (by declaration)
 7 2. Stefanie Hedlund (by declaration)
 8 3. Kevin Berg (by declaration)
 9 4. Jennifer Keough (by declaration)
 10 5. Michael McLachlan (by declaration)

11 **II. REBUTTAL EXHIBIT LIST**

12 **A. Records Supporting December 23, 2015, Judgment**

Ex. No.	Date	Description
1	July 18, 2012	Other: Minute Order from July 9, 2012 (Amended; reflects the attendance of additional counsel), Glo-Trans Number (“GTN”) 5192
2	November 9, 2012	Other: Minute Order from November 9, 2012 (amended to include list of personal appearances), GTN 5329

19 **B. Communications re Zamrzlas**

Ex. No.	Date	Description
3	June 9, 2018	Letter from Watermaster to the Zamrzlas re pumping water from the Antelope Valley Groundwater basin Z000815-816

24 **C. Evidence Post-Zamrzlas’ Motions to Set Aside or Modify Judgment**

Ex. No.	Date	Description
4	Approx. July 2003	Google Earth image of Zamrzlas’ properties
5	Approx. December 2005	Google Earth image of Zamrzlas’ properties

Ex. No.	Date	Description
6	Approx. January 2006	Google Earth image of Zamrzlas' properties
7	Approx. April 2006	Google Earth image of Zamrzlas' properties

5 DATED: March 1, 2023

KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD
A Professional Corporation

7 By: 

Eric N. Robinson
Jenifer N. Ryan
Attorneys for Defendant CITY OF LOS ANGELES and LOS ANGELES WORLD AIRPORTS

12 DATED: March 1, 2023

LEBEAU THELEN LLP

14 By:  for

Robert G. Kuhs
Attorneys for GRIMMWAY ENTERPRISES

17 DATED: March 1, 2023

LAGERLOF, LLP

19 By:  for

Thomas S. Bunn
Attorneys for PALMDALE WATER DISTRICT

22 DATED: March 1, 2023

ELLISON, SCHNEIDER, HARRIS & DONLAN LLP

24 By:  for

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

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: March 1, 2023

PRICE, POSTEL & PARMA LLP



By: _____ for _____

Craig Parton
Attorneys for ANTELOPE VALLEY
WATERMASTER

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

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF SACRAMENTO

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

On March 1, 2023, I served true copies of the following document(s) described as **SETTLING PARTIES AND WATERMASTER'S JOINT WITNESS AND EXHIBIT LIST** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY E-MAIL OR ELECTRONIC TRANSMISSION: By submitting an electronic version of the document(s) to the parties, through the user interface at avwatermaster.org.

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

Executed on March 1, 2023, at Sacramento, California.



Sherry Ramirez