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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

Coordination Proceeding Special Title
(Rule 1550 (b))

Judicial Council Coordination No. 4408
[Assigned to Hon. Jack Komar; Dept 4408]

**ANTELOPE VALLEY GROUNDWATER
CASES**

Santa Clara Co. Case No. 1-05-CV-049053

Included **CONSOLIDATED** Actions:

**STIPULATION OF FACTS FOR TRIAL
PURSUANT TO CASE MANAGEMENT
ORDER FOR PHASE IV TRIAL**

Los Angeles County Waterworks District No.
40 vs. Diamond Farming Company
Los Angeles Superior Court Case No.
BC325201

Los Angeles County Waterworks District No.
40 vs. Diamond Farming Company
Kern County Superior Court Case No. S-1500-
CV-254348 NFT

Diamond Farming Company vs. City of
Lancaster
Riverside County Superior Court Lead Case
No. RIC 344436 [Consolidated w/ Case Nos.
344668 & 353840]

1 Willis v. Los Angeles County Waterworks
2 District No. 40; Los Angeles Superior Court
3 Case No. BC 364553
4 Wood v. Los Angeles County Waterworks
District No. 40; Los Angeles Superior Court
Case No. BC 391869

5
6 **STIPULATION**

7 **IT IS HEREBY STIPULATED** by and through the parties to this stipulation, through
8 their counsel of record, that the facts set forth in the following declarations are true and require
9 no proof at the Phase IV Trial in this matter:

10 1. Declaration of Yogesh Radia Relating to Property Owned By Landinv, Inc. dated
11 February 12, 2013;

12 2. Declaration of Bruce Burrows dated March 14, 2013;

13 3. Declaration of George M. Lane in Lieu of Deposition Testimony for Phase 4
14 Trial, dated January 31, 2013, as corrected by the Notice of Errata on February 5, 2013;

15 4. Declaration of Blake McCullough-Sanden Re Phase 4 Trial dated January 31,
16 2013;

17 5. Declaration of Robert J. Pluss in Lieu of Deposition Testimony for Phase 4 Trial
18 dated January 31, 2013;

19 6. Declaration of Dean Browning in Lieu of Deposition Testimony for Phase 4 Trial
20 dated January 31, 2013; and

21 7. Declaration of John Holliday in Lieu of Deposition Testimony for Phase 4 Trial
22 dated January 31, 2013.

23 8. Declaration of Peter H. Pouwels in Lieu of Deposition Testimony for Phase 4
24 Trial dated January 31, 2013.

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26 //

1 Dated: March 15, 2013

SMILAND CHESTER LLP

3 By: 

Theodore A. Chester
Attorneys for Landinv, Inc., Bruce
Burrows and 300 A 40 H, LLC

6 Dated: March 15, 2013

TAYLOR & RING

8 By: 

James W. Lewis
Attorneys for Cross-Defendants
Little Rock Sand and Gravel, Inc.,
The George and Charlene Lane
Family Trust, The Frank and Yvonne
Lane 1993 Family Trust, Monte
Vista Building Sites, Inc., A.V.
Materials, Inc., A.C. Warnack,
Holliday Rock Co., Inc. successor in
interest to Littlerock Aggregate Co.,
dba Antelope Valley Aggregate, Inc.,
Littlerock Aggregate Co., dba
Antelope Valley Aggregate, Inc.

STATE OF CALIFORNIA

On March 15, 2013, I served the foregoing document, described as:

on the interested parties in this action in the following manner:

Executed on March 15, 2013 at Los Angeles, California.

James W. Lewis

