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8 Attorneys for Plaintiff
BORRÉGO WATER DISTRICT

Exempt from Filing Fees Pursuant to
Government Code Section 6103

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 COUNTY OF ORANGE

11
12 BORREGO WATER DISTRICT,

13 Plaintiff,

14 v.

15 ALL PERSONS WHO CLAIM A RIGHT TO
16 EXTRACT GROUNDWATER IN THE
BORREGO VALLEY GROUNDWATER
17 SUBBASIN NO. 7.024-01 WHETHER
BASED ON APPROPRIATION,
18 OVERLYING RIGHT, OR OTHER BASIS
OF RIGHT, AND/OR WHO CLAIM A
19 RIGHT TO USE OF STORAGE SPACE IN
THE SUBBASIN; et al.

20 Defendants.
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Case No. 37-2020-00005776
Judge: Peter J. Wilson
Dept. CX102

STIPULATION FOR JUDGMENT

Complaint filed: January 30, 2020
Trial Date: None Set

1 Plaintiff BORREGO WATER DISTRICT and Defendants (collectively, the “Stipulating
2 Parties”) hereby stipulate and agree as follows:

3 1. To entry of the proposed Stipulated Judgment, attached hereto as Exhibit “A” and
4 incorporated herein by reference, by the Court pursuant to Code of Civil Procedure sections 830
5 et seq., to (i) comprehensively determine and adjudicate all groundwater rights in the Borrego
6 Springs Subbasin (“Basin”) of the Borrego Valley Groundwater Basin, whether based on
7 appropriation, overlying right, prescriptive right, or other basis of right in the Basin; and
8 (ii) establish a physical solution for the perpetual and sustainable management of the Basin
9 consistent with the substantive objectives of the Sustainable Groundwater Management Act
10 (“SGMA”) and the reasonable and beneficial use of the Basin required by Article X, section 2 of
11 the California Constitution.

12 2. This Stipulation shall bind and benefit them, and will be binding upon and benefit
13 all their respective heirs, successors-in-interest, and assigns prior to and until entered by the
14 Court. In the event the Stipulated Judgment is contested by third parties and not entered by the
15 Court, this Stipulation will not bind any Stipulating Party.

16 3. Each signatory to this Stipulation represents and affirms that he or she is legally
17 authorized to bind the Stipulating Party on behalf of whom he or she is signing.

18 4. This stipulation may be signed in counterparts by the Stipulating Parties, and if
19 executed in counterparts, will be deemed to be the same instrument and valid and binding on the
20 Stipulating Parties as if fully executed all in one copy. Signatures may be made electronically
21 and sent via email.

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23 Dated: _____, 2021

BEST BEST & KRIEGER LLP

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By: _____
JAMES B. GILPIN
STEVE M. ANDERSON
SARAH CHRISTOPHER FOLEY
Attorneys for Plaintiff
BORREGO WATER DISTRICT

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<p>Dated: _____, 2021</p>	<p>O'MELVENY & MYERS LLP</p> <p>By: _____ RUSSELL MCGLOTHLIN Attorneys for Defendants T2 BORREGO LLC; T2 FARMS LLC; and T2 HOLDING LLC</p>
<p>Dated: _____, 2021</p>	<p>JACKSON TIDUS</p> <p>By: _____ MICHELE A. STAPLES GREGORY P. REGIER BOYD L. HILL Attorneys for Defendants DAVID AND JULI BAUER, CO- TRUSTEES OF THE D&J BAUER FAMILY TRUST 11-18-04; JM ROADRUNNER, LLC; SELEY RANCHES, L.P.; SHENANDOAH GROWERS, INC.; GAMINI D. WEERASEKERA; ROLAND J. JENSEN, TRUSTEE OF THE JENSEN FAMILY TRUST 8-5-83; JAMES SOMMERVILLE, TRUSTEE OF THE SOMMERVILLE TRUST 11- 22-83; ROY BRISBOIS, TRUSTEE OF THE CONZELMAN FAMILY TRUST A 11- 22-83; and STEVEN MOHLER, TRUSTEE OF THE CONZELMAN TRUST C 11-22- 83; MICHAEL C. WARD</p>
<p>Dated: _____, 2021</p>	<p>GUPTA EVANS & ASSOCIATES, PC</p> <p>By: _____ JACOBS AYRES Attorneys for Defendant WILLIAM M. BAUER</p>

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Dated: _____, 2021	PARK & SOLAR LLP By: _____ KEITH R. SOLAR Attorneys for Defendant BORRÉGO AIR RANCH MUTUAL WATER & IMPROVEMENT CO.
Dated: _____, 2021	BORREGO NAZARETH, LLC By: _____ MAISER ABONEAAJ, MANAGER
Dated: _____, 2021	BORREGO UNIFIED SCHOOL DISTRICT By: _____ MARK STEVENS, SUPERINTENDENT
Dated: _____, 2021	CWC CASA DEL ZORRO, LLC By: _____ JACK MCGRORY, MANAGER
Dated: _____, 2021	JOHN DOLJANIN By: _____ JOHN DOLJANIN
Dated: _____, 2021	LANCE LUNDBERG, TRUSTEE OF THE LUNDBERG FAMILY TRUST 10-01-98 By: _____ LANCE LUNDBERG

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Dated: _____, 2021	MONICA REAL ESTATE HOLDINGS, L.P. By: _____ RUDY MONICA
Dated: _____, 2021	THE ROADRUNNER CLUB AT BORREGO, LP By: _____ ELIAS WEINER, SOLE MEMBER
Dated: _____, 2021	THE SPRINGS RV AND GOLF RESORT, LP By: _____ ELIAS WEINER, SOLE MEMBER

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Dated: _____, 2021	By: _____
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