

FILED  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SAN BERNARDINO  
SAN BERNARDINO DISTRICT

JUL 31 2020

BY   
ERIN MUELLER, DEPUTY

SCANNED

SUPERIOR COURT FOR THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SAN BERNARDINO

CHINO BASIN MUNICIPAL WATER ) RCV 51010  
DISTRICT, )

Plaintiff,

vs.

CITY OF CHINO, et al., )

Defendants )

ORDERS RE  
CHINO BASIN WATERMASTER  
MOTION REGARDING 2020 SAFE  
YIELD RESET, AMENDMENT OF  
RESTATED JUDGMENT,  
PARAGRAPH 6

Date: July 10, 2020  
Time: 1:30 PM  
Department: 35/S1

PLEADINGS, ANALYSIS, and RULINGS<sup>1</sup>

1) Chino Basin Watermaster Motion Regarding 2020 Safe Yield Reset, Amendment  
of Restated Judgment, Paragraph 6

a) The Watermaster motion requests that the court reset the Safe Yield of the

<sup>1</sup> For this final ruling, the court has adopted 1) all of the [filed July 16, 2020] proposed revisions contained in Chino Basin Watermaster's Notice of Lodging of [Proposed] Orders Re Chino Basin Watermaster Motion Regarding 2020 Safe Yield Reset, Amendments to Restated Judgment, Paragraph 6; and 2) all of the [filed July 24, 2020] proposed revisions contained in Chino Basin Watermaster's Notice of Errata Regarding [Proposed] Orders Re Chino Basin Watermaster Motion Regarding 2020 Safe Yield Reset, Amendment of Restated Judgment, Paragraph 6; and 3) none others.

1 Chino Basin from 135,000 acre-feet per year [AFY] to 131,000 for the period  
2 commencing July 1, 2020 and ending on June 30, 2030. Pursuant to the  
3 court's continuing jurisdiction, the court previously reset the Safe Yield from  
4 its initial 140,000 AFY to 135,000 for the period of 2010 to 2020.

5 b) Additionally, Watermaster has requested the court to direct Watermaster to:

- 6 i) Undertake an interim revaluation of the Safe Yield upon the California  
7 State Water Resource Control Board's adoption of conservation measures  
8 (*i.e.*, reduced Evapotranspiration Adjustment Factors), which may impact  
9 the net recharge of the Chino Basin during the Reset Period; and  
10 ii) Move the court to further reset the Safe Yield if these conservation  
11 measures will result in a change to the Safe Yield of the Chino Basin by  
12 more than 2.5% during the Reset Period.

13 (1) The court notes that AB 1668 and SB 606 collectively known as  
14 "Making Conservation a California Way of Life" [Water Code §10609,  
15 et seq.] require the establishment of new water efficiency standards for  
16 purveyors. The State Board will adopt urban irrigation standards that  
17 could decrease the net recharge to the Basin, and thereby reduce the  
18 Safe Yield of the Basin. However, the Watermaster engineer concluded  
19 it was currently too speculative to analyze the legislation's impact on  
20 Safe Yield.

21 c) The restated judgment, the 2017 order, and the 2019 order control the 2020  
22 Safe Yield reset process.

- 23 i) The April 28, 2017 order [2017 order], pages 15 to 18, and the Reset  
24 Technical Memorandum describe the process and methodology for the  
25 2020 Safe Yield reset process.

26 (1) There was an additional order filed March 15, 2019 [2019 order] which  
27 the court entered as a resolution of the issues after the appeal of the  
28 2017 order.

1           ii) The reduction from 135,000 acre-feet to 131,000 acre-feet is a reduction of  
2           3%. The reduction from the initial 140,000 acre-feet to 131,000 acre-feet is  
3           reduction of 6.4%.

4 2) In support of the motion, Watermaster has submitted its 2020 Safe Yield  
5 Recalculation Final Report [exhibit B to the motion], prepared by Mark  
6 Wildermuth of Wildermuth Environmental [WEI], who has been Watermaster  
7 engineer for previous Safe Yield recalculations.

8 a) The court finds that the analysis complies with the 2017 order, the 2019  
9 orders, and the reset technical memorandum [exhibit A to the motion].

10 b) The court finds that the model was properly calibrated [section 6].

11 c) The court finds that the model has had adequate peer review.

12 d) The court finds that the parties had sufficient opportunity to participate and in  
13 the process for the Safe Yield reset.

14 e) The court finds that the Safe Yield reset to 131,000AFY will not result in an  
15 undesirable result or material physical injury to the Basin.

16 3) Joinders

17 a) Jurupa Community Services District (JCSD) *joinder* to Watermaster reset AND  
18 *motion for continuance*

19 i) Filed June 23, 2020, Overlying (Agricultural Pool) [Ag Pool] OBJECTION  
20 to Jurupa Community Services District [JCSD] *request for continuance* of  
21 Watermaster reset, amendment of restated judgment paragraph 6.

22 (1) The court has granted the request for continuance; the new hearing date  
23 and time is July 10, 2020, 1:30 PM, Department 35.

24 b) City of Pomona (Pomona) JOINDER in Watermaster reset [not a declaration  
25 as indicated in the register of actions (ROA)].

26 c) Inland Empire Utilities Agency [IEUA]

27 d) Cucamonga Valley Water District JOINDER in Watermaster reset [not a  
28 declaration as indicated in the ROA].

- 1 e) Fontana Union Water Company  
2 f) Jurupa Community Services District (JCSD)  
3 g) Three Valleys Municipal Water District  
4 h) Western Municipal Water District (WMWD)  
5 i) Ag Pool MOTION TO STRIKE JOINDERS of Pomona, IEUA,  
6 Cucamonga Valley Water District and Fontana Union Water Company,  
7 JCSD, Three Valleys Municipal Water District and WMWD.

8 (a) Filed June 24, 2020, Inland Empire Utility Agencies OPPOSITION  
9 to Ag Pool *motion to strike joinders* to Watermaster motion (regarding  
10 2020 Safe Yield reset) by Pomona, IEUA, Cucamonga Valley Water  
11 District, and Fontana Union Water Company, JCSD, Three Valley's  
12 Municipal Water District, and WMWD.

13 (i) The court overrules the Ag Pool *motion to strike* all joinders.

14 (ii) The court grants all joinders in the Watermaster reset motion.

15 4) OPPOSITIONS

16 a) Filed June 16, 2020, Chino OPPOSITION to Watermaster reset

17 b) Filed June 16, 2020, Ag Pool OPPOSITION to Watermaster reset

18 i) Filed June 19, 2020, Chino City REPLY to Ag Pool *opposition* to  
19 Watermaster Reset

20 (1) Ag Pool *motion to strike* Chino City REPLY to Ag Pool *opposition*.

21 (a) Chino opposition to Overlying (Agricultural) Pool [Ag Pool] "ex  
22 parte" motion to strike Chino REPLY to Ag Pool opposition to  
23 Watermaster reset motion.

24 ii) Filed June 19, 2020, Appropriative Pool [AP] REPLY to Ag Pool's  
25 *opposition* to Watermaster reset motion

26 (a) Ag Pool motion to strike Appropriative Pool REPLY to Ag Pool  
27 opposition.

28 c) Filed June 19, 2020, Watermaster REPLY *to all oppositions* to Watermaster reset

1 motion.

2 DISCUSSION

3 A. Underlying Watermaster's Safe Yield reset is the Chino Valley Model (CVM)  
4 which Mark Wildermuth and his firm have developed. The court finds the results of  
5 this model to be reliable. Wildermuth has worked in the Chino Basin for more than  
6 40 years and has developed and updated sophisticated model of the Basin, including  
7 a 2007 version of the mode which WEI updated in 2013 on which the court relied to  
8 for the court's 2017 order to set the Safe Yield for the 2011-2020 period.

9 1. Furthermore, after completing an administrative draft of the Safe Yield  
10 report, Mr. Wildermuth's firm, WEI, met with consultants from Luhdorff &  
11 Scalmanini Consulting Engineers [LSCE] as well as other technical experts associated  
12 with the Appropriative Pool and the State of California to discuss the Safe Yield  
13 analysis, methodology, modeling, and its application.

14 a) Will Halligan, of LCSE, worked with Joe Scalmanini when Scalmanini  
15 served as the court's special referee's technical expert.

16 b) After completing its evaluation, LSCE concluded that the model  
17 employed to develop the Safe Yield report, which is under the court's  
18 consideration, is consistent with prevailing professional standards.

19 B. Filed June 16, 2020, Chino opposition to Watermaster reset motion

20 1. Chino has argued that Watermaster failed to produce an estimate if the  
21 Basin's net recharge based upon the hydrological data set described in the 2017  
22 order. [Page 2, line 27.]

23 2. However, the court has found that the Safe Yield reset analysis  
24 complies with the court-ordered reset process. Wildermuth has used the Basin data  
25 not only from 1921 to 1949, but also long term precipitation data from 1885 to the  
26 present. As the court has pointed out before, the court and parties are dealing with  
27 geological time frames, and a longer time frame for data should give better long term  
28 results. The court agrees with the Watermaster argument Chino's suppositions about

1 incorporating information into a base period are just suppositions. The court must  
2 rely on the conclusions of credible experts, such as Wildermuth.

3 3. Chino wants a range of usable estimates of net recharge, but provides  
4 no basis upon which the court can make a selection among most reasonable bases.

5 4. Chino also argues that Watermaster refused to perform an uncertainty  
6 analysis, which is a standard engineering practice used to identify the uncertainties  
7 inherent in every model so as to lead to the most accurate estimate of the net  
8 recharge of the Basin. [page 3, line 1.]

9 a) However, section 1.9 of the 2020 Safe Yield Recalculation Final Report  
10 by WEI shows that there has been sufficient stakeholder and technical  
11 reviews of the Safe Yield analysis to satisfy the court.

12 5. Chino also argues that it did not have an opportunity to delve into the  
13 details of the CVM model. Release of the model could lead to parties and individuals  
14 changing inputs into the model that enable advocacy to be injected into the modeling  
15 process. Watermaster's assurances regarding transparency and open access are  
16 buttressed by the court's oversight pursuant to its continuing jurisdiction over Safe  
17 Yield, as well as the stakeholder and technical reviews set forth in the motion and  
18 supporting exhibits and declarations.

19 6. To support its opposition, Chino relies on the declaration of Dave  
20 Crosley, water and environmental manager for the city of Chino, a licensed civil  
21 engineer (involved in 25 years; primary representative for Chino to the Appropriative  
22 Pool) and the declaration of Eric Fordham, president of GeoPentech, Inc. (a  
23 registered geologist with specialty certifications in the state for engineering geology  
24 and hydrogeology, providing Chino with hydrogeology consulting services for 18  
25 years).

26 a) Generally these reports complain that Wildermuth did not take into  
27 account every possible scenario and every possible range of inputs

28 b) The court has considered the information provided by these two

1 consultations, but the court concludes that the extensive and extremely  
2 well documented Wildermuth report is a much must more persuasive,  
3 credible, and reliable basis for which the court to reset Safe Yield at  
4 131,000 acre-feet/year.

5 7. Therefore, the court denies Chino's requests to:

- 6 a) Direct Watermaster to produce an estimate of the basis projected net  
7 recharge based on the court ordered data.
- 8 b) Provide Chino the information it has requested including access to the  
9 CVM.
- 10 c) Instruct Watermaster to engage Chino and the other parties in a  
11 meaningful dialogue about the accuracy of the Basin's net recharge and  
12 the proper Safe Yield.
- 13 d) Additionally the court finds that:
- 14 I) Chino's concerns can be addressed in the OBMP planning efforts.
- 15 II) The restated judgment makes setting Safe Yield an action authorized  
16 under the court's continuing jurisdiction, and the court has expressly  
17 ordered Watermaster to assume responsibility for the necessary  
18 evaluation.
- 19 III) Watermaster conducted and facilitated the 2020 Safe Yield reset  
20 process with ongoing opportunities for participation by the parties.  
21 Chino and the Ag Pool availed themselves of these opportunities.  
22 Examples are set forth on pages 4-6 of Watermaster's reply.
- 23 IV) To rise to level of making a change and outcomes sufficiently  
24 certain to be incorporated into a Safe Yield reset the valuation, there  
25 would need to be coordinating agreements and an operating plan,  
26 none of which exist today. [Page 5, lines 9-11.]
- 27 V) While Chino argues that the language at page 16 of the 2017 order  
28 required Watermaster engineer to set the CVM base period to

1 include an “entire period” [unclear to the court, but apparently from  
2 1921 to 1949], neither the 2017 order of the reset technical  
3 memorandum mandates this. The Wildermuth declaration states his  
4 report uses long-term precipitation data from 1895 to present  
5 inclusive of the period from 1921 to the present. Wildermuth  
6 selected 1950 to 2011 for the planning period.

- 7 e) Chino’s argument would lead to a range of Safe Yields with no particular  
8 basis for the selection of one over another. There is no logical basis on  
9 which the court could make that decision. It would result in a lengthy  
10 trial and analysts experts’ opinions of varying opinions. The weight that  
11 the court gives to Wildermuth evaluation as proven itself and stood the  
12 test of time. Therefore the court selects that one.

13 C. Opposition of Overlying (Agricultural) Pool [Ag Pool]

14 1. The Ag Pool opposition is that during the 2010 to 2020 reset period,  
15 the actual net recharge to the Basin was 125,000 acre-feet per year, 10,000 acre-feet  
16 per year less than the 135,000 AFY Safe Yield projected by Watermaster’s modeling  
17 and set by the court.

- 18 a) So, the Ag Pool claims that the 2020 Safe Yield reset failed to account  
19 for this lower than projected net recharge in the Basin. The Basin’s  
20 actual hydrology was 10,000 acre-feet per year less for the last decade  
21 which adds up to the 100,000 acre-feet of over allocation. The Ag Pool  
22 asserts that this over allocation resulted in increased storage that  
23 threatens Safe Yield.
- 24 b) The Ag Pool claims Watermaster is jumping from a test projected net  
25 recharge to another projection of net recharge without adjusting for  
26 actual conditions in the Basin over the previous Safe Yield reset  
27 planning period [that is 2010 to 2019].

28 (a) The Ag Pool asserts that Watermaster’s refusal to remedy that



1 error in the current Safe Yield reset results in MPI to the  
2 Basin. [Page 6, line 19.]

- 3 c) The Ag Pool's primary concern is that "Basin storage" (also called  
4 native groundwater and some of the documents) has not been  
5 accounted for and the Safe Yield reset for the 2020 storage  
6 management plan.
- 7 I) The Ag Pool talks about Watermaster's storage management plan  
8 white paper. Nowhere else is this mentioned in any of the  
9 paperwork filed with the court. The court gathers that this white  
10 paper talks about the operational storage requirement [OSR] is the  
11 storage volume in the Chino Basin necessary to maintain Safe Yield.
- 12 II) The Ag Pool complains that depletion in Basin storage shows that  
13 the Basin's Safe Yield has not been maintained causing MPI.
- 14 (a) However, the Ag Pool does not identify any specific MPI.
- 15 (b) The Ag Pool complains that Basin storage is noted to have  
16 been reduced to less than 4.5 MAF by 2019, and that is a  
17 reduction of over 800,000 as below operational storage  
18 requirement for 1997 to 2019.
- 19 (i) There is no specific consequence to this complaint.
- 20 (c) The Ag Pool also argues that groundwater in managed storage  
21 is subject to production rights and will be extracted at some  
22 point in time. The Safe Yield reset in the 2020 storage  
23 management plan did not account for this shortfall below  
24 operational storage requirements so the extraction of  
25 managed storage will result in MPI.
- 26 (i) Again, the court notes that no MPI is not specifically  
27 identified.
- 28 (d) The Ag Pool uses an analogy to a bank account, that if you

1 take more money out than your deposit, sooner or later you  
2 run out of money. [Page 8, line 7.]

3 2. Watermaster response is that the reset looks forward, not backwards;  
4 furthermore, the reset tries to take into account all the factors. Although the  
5 Watermaster reply was with respect to both the opposition of the Chino and the Ag  
6 Pool, the court will address it here.

7 a) Watermaster argues that the Ag Pool approach is basically a worst case  
8 scenario approach. It looks to the worst drought we had in the last 50  
9 years and worries that the Basin is going to have another worst drought  
10 in the next 50 years.

11 b) The prospective long range model is the one the court must consider.  
12 Ten years in geological time is nothing more than an instant. Even 100  
13 years is a short time. The court must consider, as the Wildermuth  
14 report does, the longest time period for which relevant data exists.

15 I) Watermaster also argues that the Ag Pool approach only looks at the  
16 last 10 years.

17 (a) The court concludes that the Wildermuth report and all of its  
18 underlying data has the correct broad, not narrow,  
19 interpretation for the OBMP. The OBMP does not require  
20 that the court look only at the previous 10 years to compute  
21 Safe Yield.

22 (b) An implication of the Ag Pool opposition, not sought by the  
23 Ag Pool, is that the court should set the Safe Yield at 125,000  
24 acre-feet/year in an attempt to catch up with the 10,000 acre-  
25 feet per year that were pumped for the last 10 years without  
26 replenishment. The court has previously relied on the  
27 forecast and recommendations of Wildermuth and found  
28 them to be credible. The court will continue to rely on those

1 predictions with the additional reduction of 4000 acre-feet per  
2 year in Safe Yield.

3 (c) The storage management plan and the Safe Yield might be  
4 intimately interlinked and dependent on each other.

5 However, intertwining the two leads to the problem such as  
6 the court encountered the Safe Yield Reset Agreement  
7 (SYTRA) in 2015. There were so many objections to all the  
8 aspects of SYRA that the motion failed. The court had to  
9 focus on the groundwater analysis. The GSI report is  
10 engaging in legal analysis, not groundwater analysis.

11 (d) There is no legal requirement that the next Safe Yield be  
12 based solely upon the 10 year period 2011 to 2020. To do so  
13 would be contrary to all the court's orders and the CAMA  
14 (Court Approved Management Agreements). Also, to make  
15 such a narrow basis for projection would be too narrow a  
16 range for a substantial prediction.

17 c) The court confirms the argument of Watermaster that Safe Yield reset  
18 was never intended to precisely match actual net recharge over a 10 year  
19 period. .

20 d) There is no support in the evidence that allowing production at the  
21 projected net recharge during the reset period would constitute an  
22 undesirable results or material physical injury to the Basin.

23 I) Wildermuth's professional opinion is that allocating the Safe Yield  
24 equivalent to the net recharge during the reset period would not  
25 result in undesirable results or material physical injury.

26 (a) The court notes Watermaster's point that the "operational  
27 storage requirement" quantity cited by the Ag Pool is a  
28 remnant of a prior analysis that was prepared as a precursor

1 to the 2020 storage management plan. Those have been  
2 superseded by the analysis performed using the CVM. The  
3 CVM estimates the total quantity of water in the Basin at least  
4 12,000,000 acre feet. The court methodology does not  
5 require a “true up” related to a prior reset period.

6 (b) Additionally the Ag Pool’s comments regarding the  
7 consistency of the Safe Yield report’s recommendation with  
8 the OBMP implementation plan and Watermaster rules and  
9 regulations, the document cited have been superseded by the  
10 courts 2017 order and 2019 orders. [Page 9].

11 (i) Language in the reset technical memorandum to which  
12 the Ag Pool refers was the process in the OBMP  
13 before the courts 2017 order.

14 (ii) The Ag Pool is a party to a contest proceeding  
15 regarding applications to store and transfer excess carry  
16 over water.

17 (iii) The net recharge is estimated using parties projected  
18 water demands and production. In the case of the  
19 Appropriative Pool parties, these estimates were  
20 provided by the parties themselves.

21 3. Chino reply to Ag Pool opposition filed June 19, 2020

22 a) Ag Pool motion to strike Chino reply

23 I) The Ag Pool motion to strike

24 (a) Chino opposition to Ag Pool motion to strike Chino reply to  
25 Ag Pool opposition to reset motion filed June 26, 2020.

26 a. The Ag Pool motion to strike is denied.

27 b) Chino argues that the Ag Pool is now trying to reset retroactively the  
28 Safe Yield of the Basin to 135,000 AFY for 2010 to 2020.

- 1 c) Further, Chino argues that the Ag Pool has failed to show that there  
2 was an undesirable result of material physical injury from the  
3 “overallocation” of 10,000 AFY for the 10 year period  
4 I) For the reasons stated herein, the court finds that there was no  
5 “overallocation” and nothing for which any appropriator has a duty  
6 to replenish.

7 4. Filed June 19, 2020, Appropriative Pool reply to Overlying  
8 (Agricultural) Pool [Ag Pool] opposition

- 9 a) Motion of the Ag Pool to strike the Appropriative Pool reply.  
10 I) Motion denied.  
11 II) There is no legal basis for the request and it is simply an attempt to  
12 evade the submission of Harder’s report and the agricultural pools  
13 interpretation of that.  
14 b) The court notes that the Ag Pool gave its express written approval to  
15 the 2015 Safe Yield reset/recalculation methodology set forth in the  
16 2017 Safe Yield reset order methodology. That express written  
17 approval by the Ag Pool did not mention or advocate that the court  
18 adjust the methodology to address the claim the Ag Pool is now  
19 making, *i.e.*, that 100,000 acre-feet of water was over allocated during  
20 the 2011-2020 reset period.  
21 c) The Ag Pool’s opposition is rooted in the prior reset period on which it  
22 signed off via its express written approval of the prescribed  
23 methodology for the 2017 SYR (Safe Yield Reset) order, and it is not  
24 based on any revelatory data from the 2020 SYR motion.  
25 d) In reliance on the court’s 2017 SYR order, the Appropriative Pool  
26 members structured their operations and planning processes, and  
27 expended substantial ratepayer money based on the availability and  
28 associated cost to use Chino Basin water.

- 1 e) The Ag Pool is advocating a change in the interpretation of the 2017  
2 SYR order methodology that disregards the long-term hydrology the  
3 Basin in favor of the most recent 10 year period in contravention of the  
4 courts clear methodology directive.
- 5 f) There is no provision in the 2015 Safe Yield reset methodology and  
6 requires adjustments to account for alleged overestimated Safe Yield in  
7 the prior 10 years. Accordance with element 5 of the 2015 Safe Yield  
8 methodology, no adjustments are necessary because no material  
9 physical injury was evident from the forward projection.
- 10 g) Thomas Harder (the Appropriative Pool's technical expert) rejects the  
11 technical assertions made in the Ag Pool's opposition regarding any  
12 alleged undesirable results or material physical injury.
- 13 I) The declaration of Thomas Harder in support of the appropriative  
14 pool's reply.
- 15 (a) He essentially supports the motion.
- 16 (b) Any over allocation of Safe Yield for the period 2010 through  
17 2020 would have been accounted for any estimate of Safe  
18 Yield and the determination of no material physical injury.
- 19 (c) There is no provision in the 2015 Safe Yield reset  
20 methodology that requires adjustments to account for  
21 overestimated Safe Yield of the prior 10 years.
- 22

23 Therefore, the court orders:

24 I. Watermaster has satisfied the requirements of the court's April 28, 2017 orders  
25 for Watermaster's Motion Regarding 2015 Safe Yield Reset Agreement, Amendment  
26 of Restated Judgment, paragraph 6 ("2017 order") as they relate to the resetting of  
27 the Safe Yield of the Basin by June 30, 2020;

28 II. Paragraph 6 of the Restated Judgment is hereby amended to read as follows:

1 “Safe Yield. Safe Yield of the Basin is 131,000 acre-feet per year.”

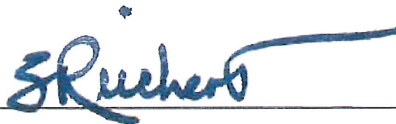
2 III. Effective date of the amendment of Paragraph 6 of the Restated Judgment is July  
3 1, 2020.

4 IV. Watermaster shall commence the next Safe Yield reset process, taking into  
5 account then prevailing best management practices and advances in hydrological  
6 science, no later than July 1, 2028, so the Safe Yield for the period commencing July  
7 1, 2030, and ending June 30, 2040, may be reset by June 30, 2030. Watermaster show  
8 present its evaluation and recommendation regarding Safe Yield for the period of  
9 July 1, 2030, and ending June 30, 2040, to the Parties to the Judgment no later than  
10 January 1 72030.

11 V. If the California State Water Resources Control Board develops water  
12 conservation measures prior to June 30, 2030, that result in a reduction in urban  
13 irrigation in the Chino Basin (*i.e.*, reduced Evapotranspiration Adjustment Factors),  
14 as required by Water Code § 10609, et seq., that is reasonably likely to materially  
15 reduce recharge to the Basin, Watermaster shall conduct a reevaluation of the Safe  
16 Yield in the Chino Basin. If the State’s measures are determined to change the Safe  
17 Yield of the Basin by more than 2.5% during the Reset Term, Watermaster will  
18 promptly move the court to reset the Safe Yield pursuant to the methodology  
19 adopted in the 2017 order.

20 IT IS SO ORDERED.

21  
22 Date: 7.31.20

23  
24 

25 Judge Stanford E. Reichert

26 San Bernardino County Superior Court  
27  
28