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SHADOW MOUNTAIN RANCH, LLC

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF RIVERSIDE

Coordination Proceeding Special Title
(Cal. Rules Of Court, rule 3.550)
MOJAVE BASIN WATER CASES

JCCP5265
CIV208568 (Lead Case Number)
Dept. 1, Riverside Superior Court
Hon. Harold W. Hopp, Judge Presiding

THE MOJAVE WATER AGENCY, AS THE
MOJAVE BASIN AREA WATERMASTER,
Plaintiff,

Coordinated with:
Case No. CIVSB2218461

v.

**JOINT STIPULATION AND
[PROPOSED] ORDER DISMISSING,
WITHOUT PREJUDICE, SHADOW
MOUNTAIN RANCH, LLC's FIRST
AMENDED CROSS-COMPLAINT AS
AGAINST THE FASOJA LIVING
TRUST**

All persons who are not presently parties to the
comprehensive groundwater adjudication in
City of Barstow, et al., v. City of Adelanto, et
al., Riverside Superior Court Case No.
CIV208568, and are either producing more than
10 acre-feet of Basin groundwater annually, or
using Basin groundwater for unlawful purposes,
and Does 1 through 2,000,

Action Filed: May 30, 1990
Amended Cross-Complaint
Filed: April 30, 2026
Trial Date: January 15, 2027

Defendants.

SHADOW MOUNTAIN RANCH, LLC,
Cross-Complainant,

v.

MOJAVE WATER AGENCY, The Fasoja
Living Trust, Buddhist-Town LLC, S.E.
Combined Services of California, Inc., Shunxing
Weng, and Roes 1 through 10,
Cross-Defendants.

JOINT STIPULATION OF DISMISSAL WITHOUT PREJUDICE

Defendant and Cross-Complainant Shadow Mountain Ranch, LLC (“SMR”) and Defendant and Cross-Defendant The Fasoja Living Trust (“Fasoja”) hereby submit this joint stipulation to dismiss SMR’s First Amended Cross-Complaint (“FACC”), without prejudice, as against Fasoja, only. The parties respectfully submit this joint stipulation through their respective counsel of record and request that the Court dismiss the FACC as against Fasoja pursuant to Code of Civil Procedure sections 581(b)(1) and (c).

1. On April 30, 2026, SMR filed its FACC.
2. The FACC identifies Fasoja in paragraph 7, stating that “The Fasoja Living Trust claims water rights or interests in this case and that it owns property within the Este Subarea of the Basin.”
3. Fasoja has provided SMR with certain real property records, including proof of real property ownership in a separate subarea of the Mojave Basin from where SMR is situated.
4. Due to the parties’ respective real property ownerships in distinct geographical and hydrological areas, the parties agree that they do not share a common source of water supply. Fasoja specifically agrees to stipulate that SMR retains an overlying water right in the Mojave Basin, and that SMR’s overlying water rights are not from a common or shared source of water supply with Fasoja.
5. Accordingly, because Fasoja and SMR do not share a common source of water supply, and because Fasoja stipulates to SMR’s overlying water rights, Fasoja does not assert any rights adverse to SMR.
6. Therefore, SMR agrees to and hereby dismisses, without prejudice, its FACC as against Fasoja.
7. The persons whose signatures appear below warrant that they have the authority to execute this Joint Stipulation for the party on whose behalf it is signed.

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1 Dated: July 31, 2026

BEST BEST & KRIEGER LLP

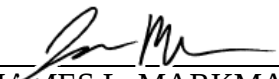
2
3 By: 

4 ERIC L. GARNER
5 CHRISTOPHER M. PISANO
6 ALISON K. TOIVOLA

7 Attorneys for Defendant and Cross-
8 Complainant
9 SHADOW MOUNTAIN RANCH, LLC

10 Dated: July ~~30~~, 2026

RICHARDS, WATSON & GERSHON

11 By: 

12 JAMES L. MARKMAN
13 KYLE H. BROCHARD
14 JACOB C. METZ

15 Attorneys for Defendant
16 THE FASOJA LIVING TRUST
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[PROPOSED] ORDER

Pursuant to the Joint Stipulation between Shadow Mountain Ranch, LLC and The Fasoja Living Trust filed on July 31, 2026, The Fasoja Living Trust is hereby dismissed as a Cross-Defendant in the above-captioned action. As to any costs incurred related to the First-Amended Cross Complaint filed by Shadow Mountain Ranch, LLC, The Fasoja Living Trust and Shadow Mountain Ranch, LLC will bear their own costs.

Dated: _____, 2026

Judge of the Superior Court

PROOF OF SERVICE

I, Monica Quinones, declare:

I am a citizen of the United States and employed in San Bernardino County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 2855 E. Guasti Road, Suite 400, Ontario, California 91761. On July 31, 2026, I served a copy of the within document(s):

**JOINT STIPULATION AND [PROPOSED] ORDER DISMISSING,
WITHOUT PREJUDICE, SHADOW MOUNTAIN RANCH, LLC's FIRST
AMENDED CROSS-COMPLAINT AS AGAINST THE FASOJA LIVING
TRUST**

- ☒ by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, the United States mail at Ontario, California addressed as set forth below.
- ☒ by transmitting via e-mail or electronic transmission the document(s) listed above to the person(s) at the e-mail address(es) set forth below.

Please see attached Service List.

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

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

Executed on July 31, 2026, at Ontario, California.



Monica Quinones

Service List

In re The Mojave Water Agency, as the Mojave Basin Area Watermaster v. All Persons Who are not parties to the comprehensive groundwater adjudication in the *City of Barstow, et al. v. City of Adelanto, et al.*, Riverside Superior Court Case No. CIV208568, and are either producing more than 10 acre-feet of Basin groundwater annually, or using Basin groundwater for unlawful purposes, and Does 1 through 2,000

Riverside Superior Court Case No.: CIVSB 2218461 (transferred)
Mojave Basin Water Cases JCCP5265

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