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5 Attorneys for DIAMOND FARMING COMPANY,  
6 a California corporation, CRYSTAL ORGANIC  
7 FARMS, a limited liability company, GRIMMWAY  
8 ENTERPRISES, INC., and LAPIS LAND COMPANY, LLC

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **IN AND FOR THE COUNTY OF SANTA CLARA**

11 Coordination Proceeding Special Title  
12 (Rule 1550 (b))

Judicial Council Coordination No. 4408

13 ANTELOPE VALLEY GROUNDWATER  
14 CASES

Case No.: 1-05-CV-049053

14 Included actions:

15 Los Angeles County Waterworks District No.  
16 40 vs. Diamond Farming Company  
Los Angeles Superior Court  
17 Case No. BC 325201

18 Los Angeles County Waterworks District No.  
19 40 vs. Diamond Farming Company  
Kern County Superior Court  
Case No. S-1500-CV 254348 NFT

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

**DIAMOND FARMING COMPANY,  
CRYSTAL ORGANIC FARMS,  
GRIMMWAY ENTERPRISES, INC.,  
AND LAPIS LAND COMPANY, LLC'S  
JOINDER IN STATE OF CALIFORNIA,  
CITY OF LOS ANGELES, COUNTY  
SANITATION DISTRICTS OF LOS  
ANGELES COUNTY NOS. 14 & 20,  
AND ANTELOPE VALLEY-EAST  
KERN WATER AGENCY'S JOINT  
OPPOSITION TO THE BLUM TRUST'S  
MOTION FOR SUMMARY  
JUDGMENT**

**Date: December 22, 2014  
Time: 10:00 a.m.  
Dept: TBD  
Judge: Hon. Jack Komar**

23 \_\_\_\_\_  
24 **AND RELATED CROSS-ACTIONS.**

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1 TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

2 If and to the extent the Court overrules DIAMOND FARMING COMPANY, CRYSTAL  
3 ORGANIC FARMS, GRIMMWAY ENTERPRISES, INC., and LAPIS LAND COMPANY, LLC's  
4 (hereafter "**Grimmway**"), objection, and considers the motion as against **Grimmway** on the merits, then  
5 **Grimmway** joins the joint opposition filed by STATE OF CALIFORNIA, CITY OF LOS ANGELES,  
6 COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY NOS. 14 & 20, and ANTELOPE  
7 VALLEY-EAST KERN WATER AGENCY.

8 Diamond Farming Company, Crystal Organic Farms, Grimmway Enterprises, Inc., and LAPIS  
9 Land Company, LLC hereby join in: (1) Joint Opposition of State of California, City of Los Angeles,  
10 County Sanitation Districts of Los Angeles County Nos. 14 & 20, and Antelope Valley-East Kern Water  
11 Agency to Blum Trust's Motion for Summary Judgment; (2) Joint Partial Opposition of State of  
12 California, City of Los Angeles, County Sanitation District's of Los Angeles County Nos. 14 & 20, and  
13 Antelope Valley-East Kern Water Agency to Blum Trust's Request for Judicial Notice; (3) Joint  
14 Objections to Blum Trust Evidence by State of California, City of Los Angeles, County Sanitation  
15 Districts of Los Angeles County Nos. 14 & 20, and Antelope Valley-East Kern Water Agency; and (4)  
16 Joint Response of State of California, City of Los Angeles, County Sanitation Districts of Los Angeles  
17 County Nos. 14 & 20, and Antelope Valley-East Kern Water Agency to Blum Trust's Separate  
18 Statement of Undisputed Facts in Support of its Motion for Summary Judgment/Summary Adjudication,  
19 filed on December 8, 2014.

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21 Dated: December 8, 2014

LeBEAU • THELEN, LLP

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By: 

BOB H. JOYCE  
Attorneys for DIAMOND FARMING COMPANY,  
a California corporation, CRYSTAL ORGANIC  
FARMS, a limited liability company, GRIMMWAY  
ENTERPRISES, INC., and LAPIS LAND  
COMPANY, LLC

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**PROOF OF SERVICE**

ANTELOPE VALLEY GROUNDWATER CASES  
JUDICIAL COUNCIL PROCEEDING NO. 4408  
CASE NO.: 1-05-CV-049053

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I am a citizen of the United States and a resident of the county aforesaid; I am over the age of eighteen years and not a party to the within action; my business address is: 5001 E. Commercenter Drive, Suite 300, Bakersfield, California 93309. On December 8, 2014, I served the within **DIAMOND FARMING COMPANY, CRYSTAL ORGANIC FARMS, GRIMMWAY ENTERPRISES, INC., AND LAPIS LAND COMPANY, LLC'S JOINDER IN STATE OF CALIFORNIA, CITY OF LOS ANGELES, COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY NOS. 14 & 20, AND ANTELOPE VALLEY-EAST KERN WATER AGENCY'S JOINT OPPOSITION TO THE BLUM TRUST'S MOTION FOR SUMMARY JUDGMENT**

■ (BY POSTING) I am "readily familiar" with the Court's Clarification Order.

Electronic service and electronic posting completed through [www.scefilings.org](http://www.scefilings.org) ; All papers filed in Los Angeles County Superior Court and copy sent to trial judge and Chair of Judicial Council.

Los Angeles County Superior Court  
111 North Hill Street  
Los Angeles, CA 90012  
Attn: **Department 1**  
(213) 893-1014

Chair, Judicial Council of California  
Administrative Office of the Courts  
Attn: Appellate & Trial Court Judicial Services  
(Civil Case Coordinator)  
Carlotta Tillman  
455 Golden Gate Avenue  
San Francisco, CA 94102-3688  
Fax (415) 865-4315

□ (BY MAIL) 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 at Bakersfield, California, in the ordinary course of business.

■ (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct, and that the foregoing was executed on December 8, 2014, in Bakersfield, California.

  
LEQUETTA HANSEN