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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 COUNTY OF LOS ANGELES  
10

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

12 **ANTELOPE VALLEY GROUNDWATER CASES**

13 Included **CONSOLIDATED** Actions:

14 **Los Angeles County Waterworks District No. 40 v.**  
15 **Diamond Farming Co.**  
Superior Court of California, County of Los Angeles,  
16 Case No. BC 325 201

17 **Los Angeles County Waterworks District No. 40 v.**  
18 **Diamond Farming Co.**  
Superior Court of California, County of Kern,  
Case No. S-1500-CV-254-348

19 **Wm. Bolthouse Farms, Inc. v. City of Lancaster**  
20 **Diamond Farming Co. v. City of Lancaster**  
21 **Diamond Farming Co. v. Palmdale Water Dist.**  
Superior Court of California, County of Riverside,  
Case Nos. RIC 353 840, RIC 344 436, RIC 344 668  
22 (Consolidated Actions)

Judicial Council Coordination  
Proceeding No. 4408

Los Angeles County Superior Court  
Lead Case No. BC 325201

Assigned to: Hon. Jack Komar  
Dept. 12

**U.S. BORAX'S STATEMENT FOR  
JUNE 19, 2012 CASE  
MANAGEMENT CONFERENCE**

Date: June 19, 2012  
Time: 9:00 a.m.  
Dept: 316


For Court's Use Only:  
Santa Clara County  
Case No. 1-05-CV-049053  
(For E-Posting/E-Service Purposes Only)

23  
24 The Parties have made further progress working towards a stipulated physical solution that  
25 would enable a final resolution of this case, including the issues involving allocation of water rights.  
26 As evidenced by the further mediation session that has been scheduled by Justice Robie, and by the  
27 upcoming meeting scheduled by the Antelope Valley East Kern Water Agency (AVEK) on June 22,  
28 the parties are showing a dedicated commitment to this settlement effort. The prior meetings have

1 resulted in substantial progress toward a resolution of the many complex issues involved in this  
2 groundwater adjudication. A detailed draft stipulated judgment and physical solution has been  
3 subjected to several rounds of review and revision, and continues to be updated with input by a large  
4 number of parties. Moreover, many parties are expending substantial resources in pursuing these  
5 settlement efforts, including multiple flights for a number of in-person meetings to address the  
6 remaining issues that have to be resolved. U.S. Borax submits that, given the multitude of parties  
7 involved and the complicated issues in play, this settlement effort is the only avenue that affords the  
8 flexibility necessary for achieving an efficient and sensible resolution of this adjudication.

9  
10 Dated: June 18, 2012

EDGAR B. WASHBURN  
WILLIAM M. SLOAN  
MORRISON & FOERSTER LLP

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12  
13 By:   
14 William M. Sloan  
15 Attorneys for U.S. BORAX INC.

1 **PROOF OF SERVICE**

2 I declare that I am employed with the law firm of Morrison & Foerster LLP, whose address is  
3 425 Market Street, San Francisco, California 94105-2482. I am not a party to the within cause, and I  
4 am over the age of eighteen years.

5 I further declare that on June 18, 2012, I served a copy of:

6 **U.S. BORAX'S STATEMENT FOR JUNE 19, 2012**  
7 **CASE MANAGEMENT CONFERENCE**

8  **BY ELECTRONIC SERVICE** by electronically posting a true copy thereof to Santa Clara  
9 County Superior Court's electronic filing website for complex civil litigation cases (Judge Jack  
10 Komar, Dept. 17C - <http://www.scefiling.org>) with respect to Judicial Council Coordination  
11 Proceeding No. 4408 (Antelope Valley Groundwater matter).

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

14 Executed at San Francisco, California, June 18, 2012.

15 Catherine L. Berté  
16 (typed)

17   
18 (signature)