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7  
8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 COUNTY OF LOS ANGELES

10  
11 Coordination Proceeding  
Special Title (Rule 3.550)

12  
13 **ANTELOPE VALLEY**  
**GROUNDWATER CASES**

14  
15 Included Actions:

16 **Los Angeles County Waterworks District No. 40**  
**v. Diamond Farming Co.**

17 Los Angeles County Superior Court  
Case No. BC 325 201

18 **Los Angeles County Waterworks District No. 40**  
**v. Diamond Farming Co.**

19 Kern County Superior Court  
Case No. S-1500-CV-254-348

20  
21 **Wm. Bolthouse Farms, Inc. v. City of Lancaster**  
**Diamond Farming Co. v. City of Lancaster**  
22 **Diamond Farming Co. v. Palmdale Water District**

23 Riverside County Superior Court  
Case Nos. RIC 353 840, RIC 344 436, RIC 344 668  
24 (Consolidated Actions)

JUDICIAL COUNCIL COORDINATION  
PROCEEDING NO. 4408

Los Angeles County Superior Court  
Lead Case No. BC 325 201

*For e-service purposes only:*  
Santa Clara County Superior Court  
Case No. 1-05-CV-049053

**U.S. BORAX'S JOINDER IN  
FEDERAL DEFENDANTS' CASE  
MANAGEMENT STATEMENT**

Date: October 12, 2012  
Time: 9:00 a.m.  
Dept: 1 (Los Angeles Superior)  
Judge: Hon. Jack Komar

1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD

2 U.S. BORAX hereby joins in the request made by Federal Defendants in their Case  
3 Management Statement filed October 5, 2012. Proceeding with adversarial discovery and trial  
4 preparation would significantly impair the ongoing settlement process that involves no less than five  
5 meetings and another two-day mediation between now and the end of November.

6 Dated: October 8, 2012

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

8  
9 By:



10 WILLIAM M. SLOAN

11 Attorneys for U.S. BORAX INC.  
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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 October 8, 2012, I served a copy of:

6 **U.S. BORAX’S JOINDER IN AGWA’S NOTICE OF MOTION  
7 AND MOTION FOR PROTECTIVE ORDER**

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

12  **BY U.S. MAIL** by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully  
13 prepaid, addressed as follows, for collection and mailing at Morrison & Foerster LLP, 425 Market Street, San  
14 Francisco, California 94105-2482 in accordance with Morrison & Foerster LLP’s ordinary business practices.  
15 I am readily familiar with Morrison & Foerster LLP’s practice for collection and processing of correspondence  
16 for mailing with the United States Postal Service, and know that in the ordinary course of Morrison & Foerster  
17 LLP’s business practice the document(s) described above will be deposited with the United States Postal  
18 Service on the same date that it (they) is (are) placed at Morrison & Foerster LLP with postage thereon fully  
19 prepaid for collection and mailing.

20  **BY FACSIMILE** by sending a true copy from Morrison & Foerster LLP’s facsimile transmission telephone  
21 number 415.268.7522 to the fax number(s) set forth below, or as stated on the attached service list. The  
22 transmission was reported as complete and without error. The transmission report was properly issued by the  
23 transmitting facsimile machine. I am readily familiar with Morrison & Foerster LLP’s practice for sending  
24 facsimile transmissions, and know that in the ordinary course of Morrison & Foerster LLP’s business practice  
25 the document(s) described above will be transmitted by facsimile on the same date that it (they) is (are) placed  
26 at Morrison & Foerster LLP for transmission.

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

Executed at San Francisco, California, October 8, 2012.

\_\_\_\_\_  
CATHERINE L. BERTÉ  
(typed)

\_\_\_\_\_  
*Catherine L. Berté*  
(signature)