

1 SCOTT K. KUNEY, Esq., SB# 111115  
 2 ERNEST A. CONANT, Esq., SB# 089111  
 3 THE LAW OFFICES OF YOUNG WOOLDRIDGE, LLP  
 4 1800 30<sup>th</sup> Street, Fourth Floor  
 5 Bakersfield, CA 93301  
 6 Telephone: (661) 327-9661  
 7 Facsimile: (661) 327-0720

8 Attorneys for Gertrude J. Van Dam, Delmar D. Van Dam,  
 9 Craig Van Dam, Gary Van Dam, and WDS California II, LLC

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
 11 **COUNTY OF LOS ANGELES**

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

14 **ANTELOPE VALLEY**  
 15 **GROUNDWATER CASES**

16 Included Actions:

17 Los Angeles County Waterworks District  
 18 No. 40 v. Diamond Farming Co.  
 19 Superior Court of California  
 20 County of Los Angeles, Case No. BC  
 21 325201

22 Los Angeles County Waterworks District  
 23 No. 40 v. Diamond Farming Co.  
 24 Superior Court of California, County of  
 25 Kern, Case No. S-1500-CV 254348

26 Wm. Bolthouse Farms, Inc. v. City of  
 27 Lancaster Diamond Farming Co. v. City of  
 28 Lancaster Diamond Farming Co. v. Palmdale  
 Water Dist. Superior Court of California,  
 County of Riverside, consolidated actions,  
 Case Nos. RIC 353840, RIC 344436, RIC  
 344668

Judicial Council Coordination Proceeding  
 No. 4408

SC Case No. 105CV 049053  
 Assigned to Hon. Jack Komar

**JOINDER OF GERTRUDE J. VAN DAM,  
 DELMAR D. VAN DAM, CRAIG VAN  
 DAM, GARY VAN DAM, AND WDS  
 CALIFORNIA II, LLC IN OBJECTION  
 TO NOTICE OF TAKING DEPOSITION  
 OF CARL VOSS WITH REQUEST FOR  
 PRODUCTION OF DOCUMENTS**

1 GERTRUDE J. VAN DAM, DELMAR D. VAN DAM, CRAIG VAN DAM AND  
2 GARY VAN DAM (collectively "VAN DAMS"), and WDS CALIFORNIA II, LLC, hereby join  
3 in Diamond Farming Company, Inc., Crystal Organic Farms, LLC, Grimmway Enterprises, Inc.,  
4 and LAPIS Company, LLC's Objection to Notice of Taking Deposition of Carl Voss with  
5 Request for Production of Documents, dated January 7, 2013.

6  
7 Dated: January 9, 2013

THE LAW OFFICES OF YOUNG WOOLDRIDGE, LLP

8  
9  
10 By: 

11 SCOTT K. KUNEY, Esq., Attorneys for Gertrude  
12 J. Van Dam, Delmar D. Van Dam, Craig Van Dam,  
13 Gary Van Dam, and WDS California II, LLC  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**PROOF OF SERVICE**

STATE OF CALIFORNIA, COUNTY OF KERN

I, ERIN L. LINDSEY, declare: I am and was at the times of the service hereunder mentioned, over the age of eighteen (18) years, and not a party to the within cause. My business address is The Law Offices of Young Wooldridge LLP, 1800 30th Street, Fourth Floor, Bakersfield, CA 93301.

On January 9, 2013, I caused the foregoing document(s) entitled as: **JOINDER OF GERTRUDE J. VAN DAM, DELMAR D. VAN DAM, CRAIG VAN DAM, GARY VAN DAM, AND WDS CALIFORNIA II, LLC IN OBJECTION TO NOTICE OF TAKING DEPOSITION OF CARL VOSS WITH REQUEST FOR PRODUCTION OF DOCUMENTS** to be served on the parties via the following service:

  X   (BY POSTING) I posted the document listed above to the Santa Clara Superior Court website regarding the Antelope Valley Groundwater matter pursuant to the Court's Clarification Order. Electronic service posting completed through [www.scefilings.org](http://www.scefilings.org).

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

Executed on January 9, 2013, at Bakersfield, California.

  
ERIN L. LINDSEY