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

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

Coordination Proceeding Special Title
(Rule 1550 (b))

Judicial Council Coordination No. 4408

ANTELOPE VALLEY GROUNDWATER
CASES

Case No.: 1-05-CV-049053

Included actions:

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

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

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

**JOINDER AND ADDITIONAL
OPPOSITION BY DIAMOND
FARMING COMPANY, INC.,
CRYSTAL ORGANIC FARMS, LLC,
GRIMMWAY ENTERPRISES, INC.
AND LAPIS LAND COMPANY, LLC
TO VAN DAM PARTIES AND
ANTELOPE VALLEY WATER
STORAGE, LLC'S OPPOSITION TO
PUBLIC WATER SUPPLIERS'
MOTION TO SIGN ORDER RE
JURISDICTION OVER TRANSFEREES**

Date: June 14, 2010
Time: 9:00 a.m.
Dept: 1 (LASC)

AND RELATED CROSS-ACTIONS.

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1 TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

2 **I. JOINDER**

3 Diamond Farming Company, Inc., Crystal Organic Farms, LLC, Grimmway Enterprises, Inc.,
4 and LAPIS Land Company, LLC hereby join in the Van Dam Parties and Antelope Valley Water
5 Storage, LLC's Opposition to Public Water Suppliers' Motion to Sign Order Re Jurisdiction Over
6 Transferees filed on May 27, 2010.

7 **II. ADDITIONAL OPPOSITION TO MOTION TO SIGN ORDER**
8 **RE JURISDICTION OVER TRANSFEREES.**

9 In addition, Diamond Farming Company, Inc., Crystal Organic Farms, LLC, Grimmway
10 Enterprises, Inc., and LAPIS Land Company, LLC add the following opposition. As applied to the two
11 landowner Classes, the proposed order is nonsensical and impractical and not likely to cure the
12 jurisdictional defect intended. (See paragraph 6 of proposed order.)

13
14 Dated: June 1, 2010

LeBEAU • THELEN, LLP

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17 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

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 June 1, 2010, I served the within **JOINDER AND ADDITIONAL OPPOSITION BY DIAMOND FARMING COMPANY, INC., CRYSTAL ORGANIC FARMS, LLC, GRIMMWAY ENTERPRISES, INC. AND LAPIS LAND COMPANY, LLC TO VAN DAM PARTIES AND ANTELOPE VALLEY WATER STORAGE, LLC OPPOSITION TO PUBLIC WATER SUPPLIERS' MOTION TO SIGN ORDER RE JURISDICTION OVER TRANSFEREES**

☒ **(BY POSTING)** I am "readily familiar" with the Court's Clarification Order. Electronic service and electronic posting completed through www.scefiling.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 June 1, 2010, in Bakersfield, California.


LEQUETTA HANSEN