Bob H. Joyce, (SBN 84607) 1 LAW OFFICES OF LEBEAU • THELEN, LLP 2 5001 East Commercenter Drive, Suite 300 3 Post Office Box 12092 Bakersfield, California 93389-2092 (661) 325-8962; Fax (661) 325-1127 4 5 Attorneys for DIAMOND FARMING COMPANY, a California corporation, CRYSTAL ORGANIC FARMS, a limited liability company, GRIMMWAY ENTERPRISES, INC., and LAPIS LAND COMPANY, LLC 7 SUPERIOR COURT OF THE STATE OF CALIFORNIA 8 9 IN AND FOR THE COUNTY OF LOS ANGELES 10 11 Coordination Proceeding Special Title Judicial Council Coordination No. 4408 (Rule 1550 (b)) 12 ANTELOPE VALLEY GROUNDWATER Case No.: 1-05-CV-049053 13 **CASES** DIAMOND FARMING COMPANY, 14 Included actions: CRYSTAL ORGANIC FARMS, GRIMMWAY ENTERPRISES, INC., 15 Los Angeles County Waterworks District No. AND LAPIS LAND COMPANY, LLC'S 40 vs. Diamond Farming Company JOINDER IN FEDERAL 16 Los Angeles Superior Court DEFENDANTS' CASE MANAGEMENT Case No. BC 325201 STATEMENT REQUEST FOR STAY 17 Los Angeles County Waterworks District No. 18 40 vs. Diamond Farming Company Kern County Superior Court **Date: October 12, 2012** 19 Case No. S-1500-CV 254348 NFT Time: 9:00 a.m. Dept: 1 20 Diamond Farming Company vs. City of Lancaster 21 Riverside County Superior Court Lead Case No. RIC 344436 [Consolidated 22 w/Case Nos. 344668 & 353840] 23 AND RELATED CROSS-ACTIONS. 24 25 26 /// 27 /// 28 DIAMOND FARMING COMPANY, CRYSTAL ORGANIC FARMS, GRIMMWAY ENTERPRISES, INC., AND LAPIS LAND COMPANY, LLC'S JOÍNDER IN FEDERAL DEFENDÁNTS' CASE MANAGEMENT STATEMENT

REQUEST FOR STAY

TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD: Diamond Farming Company, Crystal Organic Farms, Grimmway Enterprises, Inc., and LAPIS Land Company, LLC hereby join in Federal Defendants' Case Management Statement request for a stay of pre-trial procedures, including discovery, for sixty (60) days so that the parties may focus on settlement efforts without concurrently satisfying trial deadlines. LeBEAU • THELEN, LLP Dated: October 5, 2012 Attorneys for DIAMOND FARMING COMPANY, a California corporation, CRYSTAL ORGANIC FARMS, a limited liability company, GRIMMWAY ENTERPRISES, INC., and LAPIS LAND COMPANY, LLC

PROOF OF SERVICE

1 ANTELOPE VALLEY GROUNDWATER CASES 2 JUDICIAL COUNCIL PROCEEDING NO. 4408 CASE NO.: 1-05-CV-049053 3 I am a citizen of the United States and a resident of the county aforesaid; I am over the age 4 of eighteen years and not a party to the within action; my business address is: 5001 E. Commercenter 5 Drive, Suite 300, Bakersfield, California 93309. OrOctober 8, 2012, I served the within **DIAMOND** FARMING COMPANY, CRYSTAL ORGANIC FARMS, GRIMMWAY ENTERPRISES, INC., AND LAPIS LAND COMPANY, LLC'S JOINDER IN FEDERAL DEFENDANTS' 6 CASE MANAGEMENT STATEMENT REQUEST FOR STAY 7 (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 8 in Los Angeles County Superior Court and copy sent to trial judge and Chair of Judicial Council. 9 Los Angeles County Superior Court Chair, Judicial Council of California 10 111 North Hill Street Administrative Office of the Courts Los Angeles, CA 90012 Attn: Appellate & Trial Court Judicial Services 11 Attn: Department 1 (Civil Case Coordinator) Carlotta Tillman (213) 893-1014 12 455 Golden Gate Avenue San Francisco, CA 94102-3688 13 Fax (415) 865-4315 14 (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. 15 Postal Service on that same day with postage thereon fully prepaid at Bakersfield, California, in 16 the ordinary course of business. 17 (OVERNIGHT/EXPRESS MAIL) By enclosing a true copy thereof in a sealed 18 envelope designated by United States Postal Service (Overnight Mail)/Federal Express/United Parcel Service ("UPS") addressed as shown on the above by placing said envelope(s) for ordinary 19 business practices from Kern County. I am readily familiar with this business' practice of collecting and processing correspondence for overnight/express/UPS mailing. On the same day 20 that the correspondence is placed for collection and mailing, it is deposited in the ordinary course 21 of business with the United States Postal Service/Federal Express/UPS in a sealed envelope with delivery fees paid/provided for at the facility regularly maintained by United States Postal Service 22 (Overnight Mail/Federal Express/United Postal Service [or by delivering the documents to an authorized courier or driver authorized by United States Postal Service (Overnight Mail)/Federal 23 Express/United Postal Service to receive documents]. 24 25 (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 October 8, 26 2012, in Bakersfield, California. 27 28