

1 Bob H. Joyce, (SBN 84607)
2 LAW OFFICES OF
3 **LEBEAU • THELEN, LLP**
4 5001 East Commercenter Drive, Suite 300
Post Office Box 12092
Bakersfield, California 93389-2092
(661) 325-8962; Fax (661) 325-1127

5 Attorneys for DIAMOND FARMING COMPANY,
a California corporation, CRYSTAL ORGANIC
6 FARMS, a limited liability company, GRIMMWAY
ENTERPRISES, INC., and LAPIS LAND COMPANY, LLC
7

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **IN AND FOR THE COUNTY OF SANTA CLARA**
10

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

13 ANTELOPE VALLEY GROUNDWATER
14 CASES

15 Included actions:

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

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

20 Diamond Farming Company vs. City of
21 Lancaster
Riverside County Superior Court
22 Lead Case No. RIC 344436 [Consolidated
w/Case Nos. 344668 & 353840]
23

24 **AND RELATED CROSS-ACTIONS.**

Judicial Council Coordination No. 4408

Case No.: 1-05-CV-049053

**DIAMOND FARMING COMPANY,
CRYSTAL ORGANIC FARMS,
GRIMMWAY ENTERPRISES, INC.,
AND LAPIS LAND COMPANY, LLC'S
JOINDER IN DECLARATION OF
ROBERT G. KUHS IN SUPPORT OF
PHASE 6 DISCOVERY ORDER AND
SUPPORT FOR RELIEF REQUESTED**

25 ///

26 ///

27 ///

28

1 TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

2 Diamond Farming Company, Crystal Organic Farms, Grimmway Enterprises, Inc., and LAPIS
3 Land Company, LLC hereby join and support the relief requested in the Declaration of Robert G. Kuhs
4 in Support of Phase 6 Discovery Order, filed on December 10, 2013.

5
6 Dated: December 11, 2013

LeBEAU • THELEN, LLP

7
8
9 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

1 **PROOF OF SERVICE**

2 ANTELOPE VALLEY GROUNDWATER CASES
3 JUDICIAL COUNCIL PROCEEDING NO. 4408
4 CASE NO.: 1-05-CV-049053

5 I am a citizen of the United States and a resident of the county aforesaid; I am over the age
6 of eighteen years and not a party to the within action; my business address is: 5001 E. Commercenter
7 Drive, Suite 300, Bakersfield, California 93309. On December 11, 2013, I served the within
8 **DIAMOND FARMING COMPANY, CRYSTAL ORGANIC FARMS, GRIMMWAY
9 ENTERPRISES, INC., AND LAPIS LAND COMPANY, LLC'S JOINER IN
10 DECLARATION OF ROBERT G. KUHS IN SUPPORT OF PHASE 6 DISCOVERY ORDER
11 AND SUPPORT FOR RELIEF REQUESTED**

12 ■ (BY POSTING) I am "readily familiar" with the Court's Clarification Order.
13 Electronic service and electronic posting completed through www.scefilings.org ; All papers filed
14 in Los Angeles County Superior Court and copy sent to trial judge and Chair of Judicial Council.


15 Los Angeles County Superior Court
16 111 North Hill Street
17 Los Angeles, CA 90012
18 Attn: **Department 1**
19 (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

20 □ (BY MAIL) I am "readily familiar" with the firm's practice of collection and
21 processing correspondence for mailing. Under that practice it would be deposited with the U.S.
22 Postal Service on that same day with postage thereon fully prepaid at Bakersfield, California, in
23 the ordinary course of business.

24 □ (OVERNIGHT/EXPRESS MAIL) By enclosing a true copy thereof in a sealed
25 envelope designated by United States Postal Service (Overnight Mail)/Federal Express/United
26 Parcel Service ("UPS") addressed as shown on the above by placing said envelope(s) for ordinary
27 business practices from Kern County. I am readily familiar with this business' practice of
28 collecting and processing correspondence for overnight/express/UPS mailing. On the same day
that the correspondence is placed for collection and mailing, it is deposited in the ordinary course
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
(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
Express/United Postal Service to receive documents].

29 ■ (STATE) I declare under penalty of perjury under the laws of the State of
30 California that the above is true and correct, and that the foregoing was executed on December 11,
31 2013, in Bakersfield, California.


LEQUETTA HANSEN