1 2 3 4 5 6 7 8 9	JANET K. GOLDSMITH, State Bar No. 065 ERIC N. ROBINSON, State Bar No. 191781 KRONICK, MOSKOVITZ, TIEDEMANN & A Professional Corporation 400 Capitol Mall, 27th Floor Sacramento, CA 95814-4416 Telephone: (916) 321-4500 Facsimile: (916) 321-4555 ROCKARD J. DELGADILLO, City Attorne RICHARD M. BROWN, Senior Assistant City Attorney for Water and Power S. DAVID HOTCHKISS (Bar No. 076821) Assistant City Attorney JULIE A. CONBOY (Bar No. 197407) Deputy City Attorney 111 North Hope Street, Suite 340 P. O. Box 51111 Los Angeles, California 90051-0100	& GIRARD
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11 12	Attorneys for Defendant CITY OF LOS ANGELES	
	SUPERIOR COURT OF THE STATE OF CALIFORNIA	
13	COUNTY OF LOS ANGELES	
14	COUNTI	OF LOS ANGELES
15 16 17 18 19	Coordination Proceeding ANTELOPE VALLEY GROUNDWATER CASES Los Angeles County Waterworks District No. 40 v. Diamond Farming Co.	Case No. 105 CV 049053 Judicial Council Coordination Proceeding No. 4408 Hon. Jack Komar JOINDER IN MOTION FOR PROTECTIVE ORDER RE DISCLOSURE AND
20	Los Angeles County Waterworks District No. 40 v. Diamond Farming Co.	CONFIDENTIALITY OF WELL DATA AND OTHER PRIVATE INFORMATION
21	Wm. Bolthouse Farms, Inc. v. City of	Date: December 15, 2006
22	Lancaster	Time: 9:00 a.m. Dept.: 1
23	Diamond Farming Co. v. City of Lancaster	Riverside County Superior Court Lead Case No. RIC 344436
24	Diamond Farming Co. v. Palmdale Water District	Case No. RIC 344668 Case No. RIC 353840
25		Los Angeles Superior Court
26		Case No. BC 325201
27 28		Kern County Superior Court Case No. S-1500-CV-254348
۷٥	847565.1 1351.7	-1- Joinder in Motion for Protective Order

1	The City of Los Angeles ("City") hereby joins in the notice of motion and motion by	
2	Tejon Ranchcorp, and other parties, for Protective Order Regarding Disclosure and	
3	Confidentiality of Well Data and Other Private Information.	
4	In order to protect fully the private and confidential information that will be produced	
5	during this groundwater adjudication, the City requests that one additional provision be	
6	included in the proposed protective order, to be inserted as paragraph 2, as follows:	
7	2. Well reports or well logs protected by § 13752 may be introduced as evidence in court only (1) by the owner of land on which the well is located, (2) if they have been obtained through formal discovery, or (3) if they are accompanied by written consent of the landowner.	
8		
10	The City otherwise supports the proposed protection order as written.	
11	Dated: December 4, 2006	
12	KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD	
13	A Professional Corporation	
14	7. 2/4/a h	
15	By Janet K. Goldsmith	
16	Attorneys for Defendant City of Los Angeles	
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	847565.1 1351.7 -2- Joinder in Motion for Protective Order	