

1 WILLIAM M. SLOAN (BAR NO. 203583)
Email: WSloan@mofo.com
2 ALEJANDRO L. BRAS (BAR NO. 280558)
Email: ABras@mofo.com
3 **MORRISON & FOERSTER LLP**
425 Market Street
4 San Francisco, California 94105-2482
Telephone: 415.268.7000
5 Facsimile: 415.268.7522
6 Attorneys for U.S. BORAX INC.

7
8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF LOS ANGELES

10
11 Coordination Proceeding
Special Title (Rule 3.550)

12
13 **ANTELOPE VALLEY**
14 **GROUNDWATER CASES**

15 Included Actions:

16 **Los Angeles County Waterworks District No. 40**
17 **v. Diamond Farming Co.**

Los Angeles County Superior Court
Case No. BC 325 201

18 **Los Angeles County Waterworks District No. 40**
19 **v. Diamond Farming Co.**

Kern County Superior Court
Case No. S-1500-CV-254-348

20
21 **Wm. Bolthouse Farms, Inc. v. City of Lancaster**
22 **Diamond Farming Co. v. City of Lancaster**
23 **Diamond Farming Co. v. Palmdale Water District**

Riverside County Superior Court
Case Nos. RIC 353 840, RIC 344 436, RIC 344 668
(Consolidated Actions)

JUDICIAL COUNCIL COORDINATION
PROCEEDING NO. 4408

Los Angeles County Superior Court
Lead Case No. BC 325 201

For e-service purposes only:
Santa Clara County Superior Court
Case No. 1-05-CV-049053

**U.S. BORAX'S JOINDER IN
BOLTHOUSE PROPERTIES, LLC'S
AND WM. BOLTHOUSE FARMS,
INC.'S OBJECTION TO DEPOSITION
NOTICES**

1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 In light of the unprecedented burden and potential deprivation of rights caused by the more
3 than 100 depositions that have been scheduled in the month of January, U.S. BORAX hereby joins in
4 Bolthouse Properties, LLC's and Wm. Bolthouse Farms, Inc.'s Objection to Deposition Notices, filed
5 January 8, 2013.

6
7 Dated: January 9, 2013

8 WILLIAM M. SLOAN
9 ALEJANDRO L. BRAS
10 MORRISON & FOERSTER LLP

11 By: 
12 WILLIAM M. SLOAN
13 Attorneys for U.S. BORAX INC.

1 **PROOF OF SERVICE**

2 I declare that I am employed with the law firm of Morrison & Foerster LLP, whose address is
3 425 Market Street, San Francisco, California 94105-2482. I am not a party to the within cause, and I
4 am over the age of eighteen years.

5 I further declare that on January 9, 2013, I served a copy of:

6 **U.S. BORAX'S JOINDER IN BOLTHOUSE PROPERTIES,
7 LLC'S AND WM. BOLTHOUSE FARMS, INC.'S OBJECTION
8 TO DEPOSITION NOTICES**

9 **BY ELECTRONIC SERVICE** by electronically posting a true copy thereof to Santa Clara County Superior
10 Court's electronic filing website for complex civil litigation cases (Judge Jack Komar, Dept. 17C -
11 <http://www.scefiling.org>) with respect to Judicial Council Coordination Proceeding No. 4408 (Antelope
12 Valley Groundwater matter).

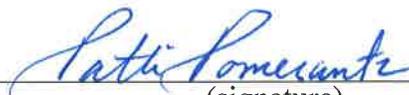
13 **BY U.S. MAIL** by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully
14 prepaid, addressed as follows, for collection and mailing at Morrison & Foerster LLP, 425 Market Street, San
15 Francisco, California 94105-2482 in accordance with Morrison & Foerster LLP's ordinary business practices.
16 I am readily familiar with Morrison & Foerster LLP's practice for collection and processing of correspondence
17 for mailing with the United States Postal Service, and know that in the ordinary course of Morrison & Foerster
18 LLP's business practice the document(s) described above will be deposited with the United States Postal
19 Service on the same date that it (they) is (are) placed at Morrison & Foerster LLP with postage thereon fully
20 prepaid for collection and mailing.

21 **BY FACSIMILE** by sending a true copy from Morrison & Foerster LLP's facsimile transmission telephone
22 number 415.268.7522 to the fax number(s) set forth below, or as stated on the attached service list. The
23 transmission was reported as complete and without error. The transmission report was properly issued by the
24 transmitting facsimile machine. I am readily familiar with Morrison & Foerster LLP's practice for sending
25 facsimile transmissions, and know that in the ordinary course of Morrison & Foerster LLP's business practice
26 the document(s) described above will be transmitted by facsimile on the same date that it (they) is (are) placed
27 at Morrison & Foerster LLP for transmission.

28 I declare under penalty of perjury under the laws of the State of California that the foregoing
is true and correct.

Executed at San Francisco, California, January 9, 2013.

Patti Pomerantz
(typed)


(signature)