

1 WILLIAM M. SLOAN (BAR NO. 203583)  
Email: [WSloan@mofo.com](mailto:WSloan@mofo.com)  
2 ALEJANDRO L. BRAS (BAR NO. 280558)  
Email: [ABras@mofo.com](mailto:ABras@mofo.com)  
3 **MORRISON & FOERSTER LLP**  
4 425 Market Street  
San Francisco, California 94105-2482  
Telephone: 415.268.7000  
5 Facsimile: 415.268.7522  
6 Attorneys for U.S. BORAX INC.  
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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 COUNTY OF LOS ANGELES  
10

11 Coordination Proceeding  
12 Special Title (Rule 3.550)

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  
20 Case No. S-1500-CV-254-348

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  
24 (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

WILLIAM M. SLOAN  
ALEJANDRO L. BRAS  
MORRISON & FOERSTER LLP

9  
10 By:

  
WILLIAM M. SLOAN

Attorneys for U.S. BORAX INC.

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**PROOF OF SERVICE**

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

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

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

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

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

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

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)