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TURLOCK IRRIGATION DISTRICT

21
22 **BEFORE THE STATE OF CALIFORNIA**
23 **STATE WATER RESOURCES CONTROL BOARD**

24 In the Matter of Administrative Civil Liability
25 Complaint Issued Against G. Scott Fahey and
Sugar Pine Spring Water, LP

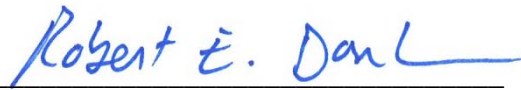
**JOINDER BY THE CITY AND COUNTY
OF SAN FRANCISCO, MODESTO
IRRIGATION DISTRICT, AND TURLOCK
IRRIGATION DISTRICT TO THE
PROSECUTION TEAM'S
SUPPLEMENTAL EVIDENCE BRIEF
AND POST-HEARING EVIDENCE
REPLY BRIEF**

1 The City and County of San Francisco (“San Francisco”) and the Modesto Irrigation
2 District and Turlock Irrigation District (collectively “the Districts”) join and support the
3 Prosecution Team’s objections to evidence, argument and testimony submitted by G. Scott Fahey
4 and Sugar Pine Spring Water Company LLP (collectively “Fahey”) regarding Fahey’s
5 construction of his obligations under Permits 20784 and 21289, and, more specifically, Fahey’s
6 characterization of his obligations to San Francisco and the Districts, as set forth in the
7 Prosecution’s January 13, 2016 Motion to Strike and Motion in Limine, the Prosecution’s April 8,
8 2016 Supplemental Evidence Brief, and the Prosecution’s April 19, 2016 Post-Hearing Evidence
9 Reply Brief.¹

10 To the extent this matter survives the Hearing Officers’ ruling on the evidentiary
11 objections, San Francisco and the Districts intend to submit closing briefs on the merits of the
12 arguments and positions advanced in this proceeding, and in particular the arguments and
13 positions advanced by Fahey relative to Fahey’s permit conditions and obligations to San
14 Francisco and the Districts. San Francisco and the Districts will submit their closing briefs within
15 two weeks of the Hearing Officers’ ruling on evidentiary objections, as required by the Hearing
16 Officers’ January 25, 2016 Briefing Schedule.

18 Dated: April 19, 2016

ELLISON, SCHNEIDER & HARRIS L.L.P
FOR CITY AND COUNTY OF SAN FRANCISCO

21 By 

22 ROBERT E. DONLAN
23 JONATHAN P. KNAPP
Attorneys for City and County of San Francisco

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27 ¹ San Francisco and MID previously joined in the Prosecution Team’s Motion to Strike and
28 Motion in Limine. See *City and County of San Francisco’s Joinder to the Prosecution Team’s
Motion to Strike and Motion in Limine*, January 20, 2016; *Modesto Irrigation District’s Joinder to
the Prosecution Team’s Motion to Strike and Motion in Limine*, January 20, 2016.

1 Dated: April 19, 2016

O'LAUGHLIN & PARIS LLP
WILLIAM C. PARIS, III
MODESTO IRRIGATION DISTRICT



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5 By: _____
WILLIAM C. PARIS, III
6 Attorneys for Real Party in Interest
7 Modesto Irrigation District

8 Dated: April 19, 2016

MASON, ROBBINS,
BROWNING & GODWIN LLP
TURLOCK IRRIGATION DISTRICT



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12 By: _____
13 ARTHUR F. GODWIN,
14 Attorneys for Real Party in Interest
15 Turlock Irrigation District
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Service List
(Revised January 5, 2016)

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