

EXHIBIT K

Lee N. Smith
(916) 558-6048 DIRECT
lnsmith@weintraub.com

Exhibit K

July 8, 2013

Ken Landau
California Regional Water
Quality Control Board
Central Valley Region
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670-6114

Re: Objections to State's Exhibits/Tosta Dairy

Dear Mr. Landau:

Objections to Evidence Submitted by RWQCB

1. Objection to Press Release. Hearsay and irrelevant, contains prejudicial information, the Reeve Road matter is not relevant to this case.
2. Objections to Chart: See Discharger's comments to Appendix A to the ACL, filed herewith.
3. Objection to Dairy General Order: The current Order has been vacated and is subject to revision at this time and is not clear how the revisions may affect the violations.
4. Objection to Exhibit 22-23: The 2002 violations are not relevant to this ACL.
5. Objection to Exhibit 24: The 2002 violations are not relevant to this ACL.
6. Object to Exhibit 26: Lacks foundation of substantive evidence.
7. Object to Exhibits 27 through 36: These prior violations are not relevant and are more prejudicial than probative.

Mr. Ken Landau
July 8, 2013
Page 2

36. Object to Exhibit 35: Inspection from 2006 is not relevant.
37. Object to Exhibit 36: Prior Stipulation as being irrelevant.
38. Object to Exhibit 37: Reeve Road site and pictures are irrelevant and are more prejudicial than proactive.
39. Object to Exhibit 43: News article is irrelevant and hearsay; Reeve Road site irrelevant.

Very truly yours,

weintraub | tobin



Lee N. Smith

LNS/cas

Enclosures: ACL, Appendix A