- 1	
1	THOMAS H. KEELING (SBN 114979)
2	FREEMAN FIRM 1818 Grand Canal Boulevard, Suite 4
3	Stockton, CA 95207 Telephone: (209) 474-1818
4	Facsimile: (209) 474-1245 Email: tkeeling@freemanfirm.com
5	Attorneys for Protestants County of San Joaquin,
6	San Joaquin County Flood Control and Water Conservation District, and
7	Mokelumne River Water and Power Authority
8	BEFORE THE
9	CALIFORNIA STATE WATER RESOURCES CONTROL BOARD
10	HEARING IN THE MATTER OF CALIFORNIA DEPARTMENT OF WATER RESOURCES AND UNITED STATES BUREAU OF RECLAMATION REQUEST PROPOSED GROUPING AND ORDERING OF PETITIONERS PURSUANT TO APRIL 25, 2016 ORDER
11	
12	FOR A CHANGE IN POINT OF) DIVERSION FOR CALIFORNIA WATER)
13	FIX)
14	
15	Protestants County of San Joaquin, San Joaquin County Flood Control and Water Conservation
16	District, and Mokelumne River Water and Power Authority (collectively, the "San Joaquin County
17	Protestants"), respectfully submit the following proposed groupings and order of Parties for cross-
18	examination in Part 1A. The undersigned has also consulted with attorney Jennifer L. Spaletta,
19	counsel for the North San Joaquin Water Conservation District, with respect to the proposed
20	groupings and order of cross-examination.
21	Proposed Grouping of Protestants for Cross Examination in Part 1A:
22	On behalf of the San Joaquin County Protestants, we propose that our three constituent parties
23	(County of San Joaquin, San Joaquin County Flood Control and Water Conservation District, and
24	Mokelumne River Water and Power Authority), as well as North San Joaquin Water Conservation
25	District, be grouped together for cross-examination in Part 1A of this proceeding. Ms. Spaletta, as
26	counsel for North San Joaquin Water Conservation District, concurs in this proposal.
27	Proposed Order of Cross-Examination:
28	The San Joaquin County Protestants request that our group, as described above, cross-examine

Petitioners' witnesses subsequent to cross-examination by the Central Delta Water Agency and South Delta Water Agency. We also agree with the suggestion made by other Protestants that Hearing staff provide a proposed order of groups for cross-examination and allow a short time for comments on that proposal before finalizing the ordering of groups. Dated: June 15, 2016 FREEMAN FIRM A PROFESSIONAL LAW CORPORATION By: Attorneys for Protestants County of San Joaquin, San Joaquin County Flood Control and Water Conservation District, and Mokelumne River Water and Power Authority

STATEMENT OF SERVICE

CALIFORNIA WATERFIX PETITION HEARING Department of Water Resources and U.S. Bureau of Reclamation (Petitioners)

I hereby certify that I have this day submitted to the State Water Resources Control Board and caused a true and correct copy of the following document(s):

PROPOSED GROUPING AND ORDERING OF PETITIONERS PURSUANT TO APRIL 25, 2016 ORDER

to be served **by Electronic Mail** (email) upon the parties listed in Table 1 of the **Current Service List** for the California WaterFix Petition Hearing, dated June 9, 2016, posted by the State Water Resources Control Board at

http://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/california_waterfix/service_list_shtml

I certify that the foregoing is true and correct and that this document was executed on June 15, 2016.

Signature: Mice Polyancho

Name: Tonia Robancho

Title: Legal Assistant for Thomas H. Keeling

Freeman Firm

Party/Affiliation:

County of San Joaquin, San Joaquin County Flood Control and Water Conservation District, and Mokelumne River Water and Power Authority

Address:

Freeman Firm, A Professional Law Corporation 1818 Grand Canal Blvd., Suite 4, Stockton, CA 95207