

1 DOWNEY BRAND LLP
2 KEVIN M. O'BRIEN (BAR NO. 122713)
3 DAVID R.E. ALADJEM (BAR NO. 152203)
4 MEREDITH E. NIKKEL (BAR NO. 254818)
5 621 Capitol Mall, 18th Floor
6 Sacramento, CA 95814-4731
7 Telephone: 916.444.1000
8 Facsimile: 916.444.2100
9 kobrien@downeybrand.com
10 daladjem@downeybrand.com
11 mnikkel@downeybrand.com

12 Attorneys for Protestant
13 NORTH DELTA WATER AGENCY

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BEFORE THE CALIFORNIA STATE WATER RESOURCES CONTROL BOARD

12 In the matter of Hearing re California
13 WaterFix Petition for Change

**JOINDER IN RESPONSE FILED BY
SACRAMENTO VALLEY WATER USERS
TO DEPARTMENT OF WATER
RESOURCES MASTER OBJECTIONS**

DOWNEY BRAND LLP

1 North Delta Water Agency ("NDWA") hereby joins and incorporates in full by reference
2 the response submitted by the Sacramento Valley Water Users ("SVWU") to the "Master
3 Objections to Protestants' Cases-in-Chief Collectively" (Master Objection) filed by the California
4 Department of Water Resources ("DWR").

5 Furthermore, to the extent that the Master Objection is asserting that any of the evidence
6 submitted by NDWA is outside the scope of Part 1, DWR has mischaracterized such evidence.
7 All of the evidence submitted by NDWA is relevant to the issue of whether the proposed changes
8 will cause injury to legal users of water as outlined in the October 30, 2015 Hearing Notice. Even
9 if any of the NDWA evidence discusses project funding or property damage due to project
10 construction (issues that DWR asserts are outside the scope of Part 1), all such evidence discusses
11 those issues in a manner that is relevant to one of the Part 1 issues and therefore not subject to
12 exclusion.

13 For the foregoing reasons, NDWA respectfully requests that DWR's Master Objections to
14 Protestants' Cases-in-Chief Collectively be overruled in its entirety. In the alternative, if the
15 SWRCB is inclined to grant DWR's request to exclude any NDWA evidence on the basis that it
16 is outside the scope of Part 1, then NDWA requests that the specific evidence be identified so that
17 a further response can be made.

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19 DATED: September 30, 2016

DOWNEY BRAND LLP

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21 By: 

MEREDITH E. NIKKEL

22 Attorney for Protestant
23 NORTH DELTA WATER AGENCY
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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);

**JOINDER IN RESPONSE FILED BY SACRAMENTO VALLEY WATER USERS
TO DEPARTMENT OF WATER RESOURCES MASTER OBJECTIONS**

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 September 29, 2016, posted by the State of Water Resources Control Board at
http://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/california_waterfix/service_list.shtml:

Note: In the event that any emails to any parties on the Current Service List are undeliverable, you must attempt to effectuate service using another method of service, if necessary, and submit another statement of service that describes any changes to the date and method of service for those parties.

For Petitioners Only:

	I caused a true and correct hard copy of the document(s) to be served by the following method of service to Suzanne Womack & Sheldon Moore, Clifton Court, L.P., 3619 Land Park Drive, Sacramento, CA 95818: Method of Service: _____
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I certify that the foregoing is true and correct and that this document was executed on September 30, 2016.

Signature: Catharine Irvine

Name: Catharine Irvine

Title: Legal Secretary

Party/Affiliation: Downey Brand, LLP

Address: 621 Capitol Mall, Sacramento, CA 95814