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8 Attorneys for Objectors/Respondents
Kinch Hoekstra and Edward Keonjian, Trustees of the
9 L.L. Nunn Trust

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF INYO

13 In re the Matter of the
14 L.L. Nunn Trust for the benefit of Deep
15 Springs College under the Deed of Trust dated
November 5, 1923

Case No. SI CV PM 1253232

**RESPONDENTS' NOTICE OF
MOTION AND MOTION TO JOIN
DEEP SPRINGS CORPORATION AS A
PARTY**

DATE: October 30, 2012
TIME: 9:00 AM
DEPT: 4
JUDGE: Hon. Dean T. Stout

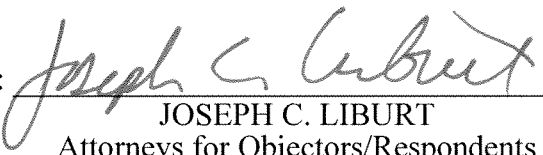
ACTION FILED: February 6, 2012

1 TO PETITIONERS AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on October 30, 2012, at 9:00 a.m. or soon thereafter as the
3 matter may be heard, before the Honorable Dean Stout, Department 4, Inyo County Superior
4 Court, 301 West Line Street, Bishop, California, objector/respondents Kinch Hoekstra and
5 Edward Keonjian (“Respondents”), who are Trustees of the L.L. Nunn Trust, will and hereby do
6 move for an order granting their Motion to Join Deep Springs Corporation As A Party. This
7 motion is made on the grounds that (a) the Deep Springs Corporation is an alter ego of the
8 Trustees of Deep Springs, and the Court should pierce the corporate veil and determine that the
9 Deep Springs Corporation is already a party before the Court subject to the Court’s orders; (b) in
10 the alternative, that the Deep Springs Corporation is an agent of the Trustees of Deep Springs,
11 and bound by this Court’s orders to the same extent as the Trustees; and/or (c) in the alternative,
12 that the Deep Springs Corporation is a necessary party that should be joined in this proceeding as
13 a co-petitioner and without whose presence complete and meaningful relief cannot be granted.
14 The motion is based on this Notice, the Memorandum of Points and Authorities filed herewith,
15 the Declarations of Kinch Hoekstra, Edward Keonjian, and Jeffrey Johnson, the papers on file in
16 this action, any matter of which the Court may or must take judicial notice, oral argument at the
17 hearing, and any other matter which the Court deems appropriate.

18 Dated: October 2, 2012

JOSEPH C. LIBURT
Orrick, Herrington & Sutcliffe LLP

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21 By: 
22 JOSEPH C. LIBURT
23 Attorneys for Objectors/Respondents
24 Kinch Hoekstra and Edward Keonjian,
25 Trustees of the L.L. Nunn Trust
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