

1 HANSON BRIDGETT LLP
MICHAEL J. VAN ZANDT, SBN 96777
2 mvanzandt@hansonbridgett.com
425 Market Street, 26th Floor
3 San Francisco, California 94105
Telephone: (415) 777-3200
4 Facsimile: (415) 541-9366

5 Attorneys for Proposed Intervenor-Real Party
in Interest Valley Meat Co., LLC
6

7 UNITED STATES DISTRICT COURT
8 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION
9

10 FRONT RANGE EQUINE RESCUE, THE
HUMANE SOCIETY OF THE UNITED
11 STATES, MARIN HUMANE SOCIETY,
HORSES FOR LIFE FOUNDATION,
12 RETURN TO FREEDOM, RAMONA
CORDOVA, KRYSTLE SMITH, CASSIE
13 GROSS, DEBORAH TRAHAN, and
BARBARA SINK,

14 Plaintiffs,

15 v.

16 TOM VILSACK, Secretary U.S.
17 Department of Agriculture; ELIZABETH A.
HAGEN, Under Secretary for Food Safety,
18 U.S. Department of Agriculture; and
ALFRED A. ALMANZA, Administrator,
19 Food Safety and Inspection Service, U.S.
Department of Agriculture,
20

21 Defendants.
22
23
24
25
26
27
28

CASE NO. 4:13-CV-03034-YGR

**DECLARATION OF RICARDO DE LOS
SANTOS IN SUPPORT OF VALLEY
MEAT COMPANY, LLC'S MOTION TO
INTERVENE**

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH CALIFORNIA
SAN FRANCISCO DIVISION

FRONT RANGE EQUINE RESCUE, THE)	
HUMANE SOCIETY OF THE UNITED)	
STATES, MARIN HUMANE SOCIETY,)	
HORSES FOR LIFE FOUNDATION,)	Case: 4:13-cv-03034-YGR
RETURN TO FREEDOM, RAMONA)	
CORDOVA, KRYSTLE SMITH, CASSIE)	
GROSS, DEBORAH TRAHAN, and)	Judge:
BARBARA SINK,)	
)	
Plaintiffs,)	
v.)	
)	
TOM VILSACK, Secretary U.S. Department)	
of Agriculture; ELIZABETH A. HAGEN,)	
Under Secretary for Food Safety, U.S.)	
Department of Agriculture; and ALFRED A.)	
ALMANZA, Administrator, Food Safety and)	
Inspection Service, U.S. Department of)	
Agriculture,)	
)	
Defendants.)	

DECLARATION OF RICARDO DE LOS SANTOS IN SUPPORT VALLEY
MEAT COMPANY, LLC's MOTION TO INTERVENE

DECLARATION OF RICARDO DE LOS SANTOS

I, RICARDO DE LOS SANTOS, declare as follows:

- I am the General Manager of Valley Meat Company, LLC ("VALLEY"), a New Mexico Limited Liability Company. I am authorized to act and make statements on behalf of VALLEY. I have personal knowledge of the facts set forth in this declaration. The facts set forth are true to the best of my knowledge and recollection. If called, I could and would testify to these facts in a court of law.

2. Proposed Intervenor VALLEY is agriculture industry operation located in Roswell, New Mexico. VALLEY has been in the business of processing livestock for human consumption for over 20 years. VALLEY has been permitted as such a facility under the Federal Meat Inspection Act for more than 20 years. VALLEY has subjected itself to and complied with all applicable laws and regulations to the best of its knowledge and ability over that time period.

3. In late fall of 2011, VALLEY began the process of transitioning from processing beef to processing equines. VALLEY to the best of its ability worked in cooperation and conjunction with USDA FSIS to accomplish this objective.

4. VALLEY continues in this effort to the present day and is still actively engaged in the process of obtaining the necessary inspections coupled with a Grant of Inspection to process equine animals for human consumption. Over the course of time it became apparent that USDA had decided not to cooperate or to comply with the law and VALLEY retained counsel for the purpose of seeking a legal remedy to the issue. In late October 2012, VALLEY filed suit in Federal District Court in New Mexico. That case is still pending under Case No. 2:12-cv-01083-JCH-CG before Judge Judith C. Herrera.

5. VALLEY intends to continue to seek the necessary approvals and inspections to begin operations of its lawful business enterprise.

6. VALLEY has been directly threatened with litigation by several of Plaintiffs in the current case at bar. VALLEY learned on July 2, 2013 that Plaintiffs had filed litigation seeking to enjoin the Federal Government from granting the necessary approvals such that VALLEY may pursue its lawful agribusiness enterprise. VALLEY will be substantially harmed by further delay if the government

is so enjoined. To that end I have authorized our attorney A. Blair Dunn to seek to have the company intervene in the present legal action.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct, based on my own personal knowledge and experience.

Executed this 8th day of July 2013, in Capitan, NM.



Ricardo De Los Santos