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October 1, 2008

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Via E-filing & Mailed

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Re: Antelope Valley Groundwater Litigation
Santa Clara County Superior Court Case No. 1-05-CV-049053
Judicial Council Coordination Proceeding No. 4408

Dear Counsel:

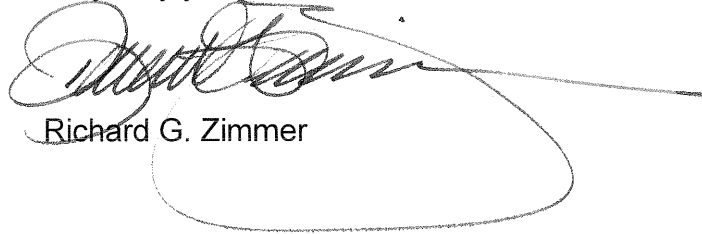
This correspondence is in regard to your client's responses to Bolthouse Properties, LLC's and Wm. Bolthouse Farms, Inc.'s Form Interrogatories, Special Interrogatories, Request for Admissions and Request for Production of Documents. These responses were insufficient, relied upon improper objections and/or made claims that the subject matter was not currently subject to discovery. We disagree with these contentions. We need to meet and confer regarding these issues before discussing them with Judge Komar as he has requested.

Given the fact that we all have trial scheduled to start on October 6, this correspondence is to suggest that we defer the meet and confer process and any motions until sometime after November 15th to give us time to get through the more pressing issues of trial. If necessary, we can extend the time frame further.

To Counsel
Re: Antelope Valley Groundwater Litigation
October 1, 2008
Page 2

Assuming you have no objection, there is no need to respond and we will proceed accordingly. Thank you for your courtesy and cooperation in this regard.

Very truly yours,

A handwritten signature in black ink, appearing to read "Richard G. Zimmer", is written over a large, faint circular stamp or watermark.

Richard G. Zimmer

RGZ/nm

BL/ANTELOPE VALLEY/SANTA MARIA/PWS COUNSEL-1