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9 (661) 322-6023

6 Attorneys for Bolthouse Properties, LLC and Wm. Bolthouse Farms,  
7 Inc.

8 SUPERIOR COURT OF CALIFORNIA

9 COUNTY OF SANTA CLARA

10 \* \* \*

11 COORDINATION PROCEEDING  
12 SPECIAL TITLE (Rule 1550(b))

) Judicial Council Coordination  
) Proceeding No. 4408

13 ANTELOPE VALLEY GROUNDWATER  
14 CASES

) CASE NO. 1-05-CV-049053  
)

14 INCLUDED ACTIONS:

) OBJECTION TO NOTICE OF EXPERT  
) DEPOSITION AND REQUEST FOR  
) PRODUCTION OF DOCUMENTS

15 LOS ANGELES COUNTY WATERWORKS  
16 DISTRICT NO. 40 v. DIAMOND  
17 FARMING COMPANY, et al.,  
18 Los Angeles Superior Court  
19 Case No. BC325201

) Phase 2 Trial Date: November 3,  
) 2008  
)

18 LOS ANGELES COUNTY WATERWORKS  
19 DISTRICT NO. 40 v. DIAMOND  
20 FARMING COMPANY, et al.,  
21 Kern County Superior Court  
22 Case No. S-1500-CV-254348

) DATE: October 24, 2008  
) TIME: 9:30 a.m.  
) Place: Tejon Ranch  
) 4436 Lebec Road  
) Lebec, CA 93243  
)

21 DIAMOND FARMING COMPANY, and  
22 W.M. BOLTHOUSE FARMS, INC., v.  
23 CITY OF LANCASTER, et al.,  
24 Riverside Superior Court  
25 Case No. RIC 344436 [c/w case  
26 no. RIC 344668 and 353840]

)  
) ROSAMOND COMMUNITY SERVICES  
) DISTRICT,  
) CROSS-COMPLAINANT,  
)

1 Wm. Bolthouse Farms, Inc. and Bolthouse Properties, LLC  
2 hereby object to the Notice of Expert Deposition and Request for  
3 Production of Documents regarding Tom Sheahan propounded by Tejon  
4 Ranchcorp.

5 Bolthouse Farms and Bolthouse Properties have previously  
6 served a Notice of Deposition of Tom Sheahan pursuant to the  
7 agreement of all parties. Tejon Ranchcorp's Notice ignores the  
8 previously propounded Notice and seeks to alter the date for the  
9 deposition. The previously propounded Notice specified that Mr.  
10 Sheahan would be produced for deposition on October 27, 2008 at  
11 9:00 a.m. at the offices of Langerlof, Senecal, et al., LLP,  
12 located at 301 North Lake Avenue, 10<sup>th</sup> Floor, Pasadena, California  
13 91101-4108. Mr. Sheahan is not available for deposition on  
14 October 24, 2008, and Bolthouse Properties and Bolthouse Farms  
15 will not produce Mr. Sheahan pursuant to the Notice of Tejon  
16 Ranchcorp.

17 DATED: October 15, 2008

18 CLIFFORD & BROWN

19  
20 By: 

21 RICHARD G. ZIMMER, ESQ.  
22 T. MARK SMITH, ESQ.  
23 Attorneys for  
24 BOLTHOSUE PROPERTIES, LLC and  
25 WM. BOLTHOUSE FARMS, INC.  
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**PROOF OF SERVICE (C.C.P. §1013a, 2015.5)**

*Antelope Valley Groundwater Cases  
Judicial Counsel Coordination Proceeding No. 4408  
Santa Clara County Superior Court Case No. 1-05-CV-049053*

I am employed in the County of Kern, State of California. I am over the age of 18 and not a party to the within action; my business address is 1430 Truxtun Avenue, Bakersfield, CA 93301.

On October 15, 2008, I served the foregoing document(s) entitled:

**OBJECTION TO NOTICE OF EXPERT DEPOSITION AND REQUEST FOR PRODUCTION OF DOCUMENTS**

— by placing the true copies thereof enclosed in sealed envelopes addressed as stated on the attached mailing list.

— by placing \_ the original, \_ a true copy thereof, enclosed in a sealed enveloped addressed as follows:

**X BY SANTA CLARA SUPERIOR COURT E-FILING IN COMPLEX LITIGATION PURSUANT TO CLARIFICATION ORDER DATED OCTOBER 27, 2005.**

Executed on October 15, 2008, at Bakersfield, California.

X (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

— (Federal) I declare that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.

  
NANETTE MAXEY  
2455-2