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

8 SUPERIOR COURT OF CALIFORNIA

9 COUNTY OF SANTA CLARA

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11 COORDINATION PROCEEDING ) Judicial Council Coordination  
12 SPECIAL TITLE (Rule 1550(b)) ) Proceeding No. 4408  
13 ANTELOPE VALLEY GROUNDWATER )  
14 CASES ) CASE NO. 1-05-CV-049053  
15 INCLUDED ACTIONS: )  
16 LOS ANGELES COUNTY WATERWORKS ) **DECLARATION OF N. THOMAS**  
17 DISTRICT NO. 40 v. DIAMOND ) **SHEAHAN IN SUPPORT OF BOLTHOUSE**  
18 FARMING COMPANY, et al., ) **PROPERTIES, LLC'S AND WM.**  
19 Los Angeles Superior Court ) **BOLTHOUSE FARMS, INC.'S MOTION**  
20 Case No. BC325201 ) **TO QUASH TRIAL SUBPOENA OF N.**  
21 ) **THOMAS SHEAHAN**  
22 ) **DATE: OCTOBER 31, 2008**  
23 LOS ANGELES COUNTY WATERWORKS ) **TIME: 9:00 A.M.**  
24 DISTRICT NO. 40 v. DIAMOND ) **DEPT: 17C**  
25 FARMING COMPANY, et al., )  
26 Kern County Superior Court )  
27 Case No. S-1500-CV-254348 )  
28 )  
29 DIAMOND FARMING COMPANY, and )  
30 W.M. BOLTHOUSE FARMS, INC., v. )  
31 CITY OF LANCASTER, et al., )  
32 Riverside Superior Court )  
33 Case No. RIC 344436 [c/w case no. )  
34 RIC 344668 and 353840] )  
35 )  
36 ROSAMOND COMMUNITY SERVICES )  
37 DISTRICT, )  
38 CROSS-COMPLAINANT, )

1 I, N. THOMAS SHEAHAN, declare as follows:

2 1. I am a Senior Consultant Hydrogeologist for the firm of  
3 AMEC Geomatrix, Inc., and am licensed in California as a  
4 Professional Geologist, Professional Geophysicist, Certified  
5 Engineering Geologist, and Certified Hydrogeologist.

6 2. I was retained as a consultant and later disclosed as  
7 an expert by Richard G. Zimmer, Esq., of Clifford & Brown, on  
8 behalf of Bolthouse Properties, LLC and Wm. Bolthouse Farms,  
9 Inc., in connection with Phase II of the *Antelope Valley*  
10 *Groundwater Cases*, Superior Court of the State of California,  
11 County of Santa Clara, Judicial Council Coordination Proceeding  
12 No. 4408, Santa Clara Case No. 1-05-CV-049053.

13 3. I turned 70 years of age this year. Nearly a year ago,  
14 I planned a vacation in Hawaii with my whole family to celebrate  
15 this birthday. My vacation has been scheduled for the period  
16 from November 3, 2008 through November 14, 2008. I have made  
17 reservations and have pre-paid hotel and airline costs for the  
18 following eighteen (18) persons, all members of my family:

- 19 • Myself, N. Thomas Sheahan;
- 20 • My wife, Barbara Sheahan;
- 21 • My daughter, Jennifer Robinson;
- 22 • My grandson, James Robinson;
- 23 • My granddaughter, Jasmine Leitch;
- 24 • My granddaughter's fiancé, Lupe Ojeda;
- 25 • My son, Michael Sheahan, Sr.;
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- My daughter-in-law, Jennifer Sheahan;
- My granddaughter, Cassidy Sheahan;
- My granddaughter, Callista Sheahan;
- My grandson, Michael Sheahan, Jr.;
- My daughter, Gwendolyn Parker;
- My son-in-law, Ronnie Parker;
- My grandson, Jacob Parker;
- My granddaughter, Madeline Parker;
- My daughter, Elizabeth Portillo;
- My grandson, David Portillo; and
- My grandson, Thomas Portillo.

4. All of these individuals, who are members of my family, are flying in to Hawaii to join me during the period of November 3, 2008 through November 14, 2008. Each of these individuals has gone to considerable trouble to arrange their own work and school schedules to accommodate this family trip.

5. I advised Mr. Zimmer of my vacation plans several months ago, and I understand that he advised the Court and all attorneys for all parties to this matter well in advance of the final trial date being set.

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this Declaration was executed on the 24<sup>th</sup> day of October 2008, in Murrieta, California.



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N. THOMAS SHEAHAN