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

8 SUPERIOR COURT OF CALIFORNIA

9 COUNTY OF SANTA CLARA

10 * * *

11 COORDINATION PROCEEDING) Judicial Council Coordination Proceeding
12 SPECIAL TITLE (Rule 1550(b))) No. 4408
)
13 ANTELOPE VALLEY GROUNDWATER) CASE NO. 1-05-CV-409053
14 CASES)
)
15 INCLUDED ACTIONS:)
)
16 LOS ANGELES COUNTY)
WATERWORKS DISTRICT NO. 40 v.)
17 DIAMOND FARMING COMPANY, et al.,) **BOLTHOUSE PROPERTIES, LLC'S**
Los Angeles Superior Court Case No.) **AND WM. BOLTHOUSE FARMS,**
18 BC325201) **INC.'S ADDITIONAL ARGUMENT**
) **AND JOINDER IN TEJON**
19 LOS ANGELES COUNTY) **RANCHCORP'S OPPOSITION TO**
20 WATERWORKS DISTRICT NO. 40 v.) **UNITED STATES' REQUEST TO**
DIAMOND FARMING COMPANY, et al.,) **AMEND CASE MANAGEMENT**
21 Kern County Superior Court Case No. S-) **ORDER OF MARCH 22, 2010**
1500-CV-254348)
22)
)
23 DIAMOND FARMING COMPANY, and)
W.M. BOLTHOUSE FARMS, INC., v.)
24 CITY OF LANCASTER, et al.,)
Riverside Superior Court)
25 Case No. RIC 344436 [c/w case no. RIC)
344668 and 353840])
26)
)
27)

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1 TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

2 Bolthouse Properties, LLC and Wm. Bolthouse Farms, Inc. join in the Opposition of
3 Tejon Ranchcorp to the request of the United States to amend Case Management Order of
4 March 22, 2010.

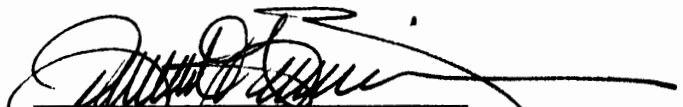
5 These responding parties object to more detailed reports beyond that required by Code.
6 Although the purveyors had their experts involved in a Technical Committee for some time,
7 and may be able to create a detailed report, including all their conclusions, the other defendants
8 have not. Even if this could be done, attempting to attach all supporting documents and include
9 a discussion of all arguments would be virtually impossible without substantial periods of time
10 to develop these opinions. Finally, attempting to do so would be extremely time consuming
11 and expensive. Accordingly, these responding defendants object to using the Federal procedure
12 rather than the California procedure.

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14 DATED: April 30, 2010

Respectfully submitted.

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16 CLIFFORD & BROWN

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18 By:


19 RICHARD G. ZIMMER, ESQ.
20 Attorneys for BOLTHOUSE PROPERTIES,
21 LLC and WM. BOLTHOUSE FARMS, INC

