

1 RICHARD G. ZIMMER - SBN 107263  
2 T. MARK SMITH - SBN 162370  
3 CLIFFORD & BROWN  
4 A Professional Corporation  
5 Attorneys at Law  
6 Bank of America Building  
7 1430 Truxtun Avenue, Suite 900  
8 Bakersfield, CA 93301-5230  
9 (661) 322-6023

10 Attorneys for Bolthouse Properties, LLC and Wm. Bolthouse Farms,  
11 Inc.

12 SUPERIOR COURT OF CALIFORNIA  
13 COUNTY OF SANTA CLARA

14 \* \* \*

15 COORDINATION PROCEEDING  
16 SPECIAL TITLE (Rule 1550(b))

) Judicial Council Coordination  
) Proceeding No. 4408

17 ANTELOPE VALLEY GROUNDWATER  
18 CASES

) CASE NO. 1-05-CV-049053

19 INCLUDED ACTIONS:

20 LOS ANGELES COUNTY WATERWORKS  
21 DISTRICT NO. 40 v. DIAMOND  
22 FARMING COMPANY, et al.,  
23 Los Angeles Superior Court  
24 Case No. BC325201

) OBJECTION TO AMENDED NOTICE OF  
) DEPOSITION OF DISCLOSED EXPERT  
) WITNESS THOMAS SHEAHAN AND  
) PRODUCTION OF EXPERT'S FILE AT  
) DEPOSITION AND INTENTION TO  
) MAKE VIDEO RECORDING OF  
) TESTIMONY

25 LOS ANGELES COUNTY WATERWORKS  
26 DISTRICT NO. 40 v. DIAMOND  
FARMING COMPANY, et al.,  
Kern County Superior Court  
Case No. S-1500-CV-254348

) Phase 3 Trial Date:  
) September 27, 2010

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

) DATE: October 26 and 27, 2010  
) TIME: 10:00 A.M.  
) LOCATION: Lagerlof, Senecal,  
) et al., LLP  
) 301 North Lake Avenue  
) 10<sup>th</sup> Floor  
) Pasadena, CA 91101  
) (626) 793-9400

ROSAMOND COMMUNITY SERVICES  
DISTRICT,  
CROSS-COMPLAINANT,

)

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

**TO THE NOTICING PARTY HEREIN:**


Objection is hereby made to the Amended Notice of Deposition of Disclosed Expert Thomas Sheahan and Production of Expert's File at Deposition and Intention to Make Video Recording of Testimony on the following grounds:

- 7. Objection, vague, overbroad, irrelevant.
  - 9. Objection, vague.
  - 11. Objection, vague.
  - 12. Objection, vague.
  - 13. Objection, vague.
  - 14. Objection, vague.
  - 15. Objection, overbroad, unduly burdensome.
- Notwithstanding the objection, this witness will be in a position to discuss reference materials reviewed to formulate opinions in the case.
- 16. Objection, vague.
  - 17. Objection, vague.
  - 18. Objection, vague.

DATED: October 12, 2010

CLIFFORD & BROWN

By:



RICHARD G. ZIMMER, ESQ.  
T. MARK SMITH, ESQ.  
Attorneys for  
BOLTHOSUE PROPERTIES, LLC and  
WM. BOLTHOUSE FARMS, INC.

1 **PROOF OF SERVICE (C.C.P. §1013a, 2015.5)**

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

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

7 On October 12, 2010, I served the foregoing document(s) entitled:

8 **BOLTHOUSE PROPERTIES, LLC AND WM. BOLTHOUSE FARMS, INC.**  
9 **OBJECTION TO AMENDED NOTICE OF DEPOSITION OF DISCLOSED EXPERT**  
10 **WITNESS THOMAS SHEAHAN AND PRODUCTION OF EXPERT'S FILE AT**  
11 **DEPOSITION AND INTENTION TO MAKE VIDEO RECORDING OF TESTIMONY**

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

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

16 **X BY SANTA CLARA SUPERIOR COURT E-FILING IN COMPLEX**  
17 **LITIGATION PURSUANT TO CLARIFICATION ORDER DATED OCTOBER**  
18 **27, 2005.**

19 Executed on October 12, 2010, at Bakersfield, California.

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

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

24 

25 **NANETTE MAXEY**  
26 **2455-2**