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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
17) Proceeding No. 4408
18 ANTELOPE VALLEY GROUNDWATER)
19 CASES) CASE NO. 1-05-CV-049053
20)
21 INCLUDED ACTIONS:)
22)
23 LOS ANGELES COUNTY WATERWORKS) **OBJECTION TO CONTINUED NOTICE**
24 DISTRICT NO. 40 v. DIAMOND) **OF DEPOSITION OF DISCLOSED**
25 FARMING COMPANY, et al.,) **EXPERT WITNESS THOMAS SHEAHAN**
26 Los Angeles Superior Court) **AND PRODUCTION OF EXPERT'S FILE**
Case No. BC325201) **AT DEPOSITION AND INTENTION TO**
) **MAKE VIDEO RECORDING OF**
) **TESTIMONY**
27 LOS ANGELES COUNTY WATERWORKS)
28 DISTRICT NO. 40 v. DIAMOND)
29 FARMING COMPANY, et al.,) Phase 3 Trial Date:
30 Kern County Superior Court) September 27, 2010
31 Case No. S-1500-CV-254348)
32)
33 DIAMOND FARMING COMPANY, and) **DATE: November 29 and 30, 2010**
34 W.M. BOLTHOUSE FARMS, INC., v.) **TIME: 10:00 A.M.**
35 CITY OF LANCASTER, et al.,) **LOCATION: Lagerlof, Senecal,**
36 Riverside Superior Court) **et al., LLP**
Case No. RIC 344436 [c/w case) **301 North Lake Avenue**
no. RIC 344668 and 353840]) **10th Floor**
37 ROSAMOND COMMUNITY SERVICES) **Pasadena, CA 91101**
38 DISTRICT,) **(626) 793-9400**
39 CROSS-COMPLAINANT,)
40)

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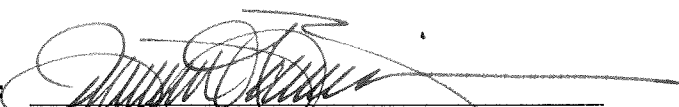
TO THE NOTICING PARTY HEREIN:

Objection is hereby made to the Continued 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: November 23, 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 November 23, 2010, I served the foregoing document(s) entitled:

8 **OBJECTION TO CONTINUED NOTICE OF DEPOSITION OF DISCLOSED EXPERT
9 WITNESS THOMAS SHEAHAN AND PRODUCTION OF EXPERT'S FILE AT
10 DEPOSITION AND INTENTION TO MAKE VIDEO RECORDING OF TESTIMONY**

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

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

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

18 Executed on November 23, 2010, at Bakersfield, California.

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

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

23
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25
26

NANETTE MAXEY
2455-2