

# EXHIBIT B

**Tom Sheahan**

**From:** Tom Sheahan  
**Sent:** Saturday, March 09, 2002 6:22 PM  
**To:** 'msmith@clifford-brownlaw.com'; 'zimmer@clifford-  
**Subject:** Confirming Authorization for Services  
 Dear Mark and Rick,

This email is to confirm the oral authorization from Richard Zimmer for Geomatrix to provide services to Clifford & Brown in connection with the matter captioned Wm. Bolthouse Farms, Inc. v. City of Lancaster, et al. I previously emailed the Geomatrix Standard Schedule of Charges and Conditions to Smith on February 15, 2002, along with a copy of my resume. The work authorized will be conducted on a time-and-materials basis. My billing rate is \$250 per hour. Please see the Standard Schedule of Charges for rates applicable to depositions and court testimony. I understand that I have been designated as an expert witness for this matter. Consequently, I will consider that I am engaged directly by Clifford & Brown, and that all of my work will Attorney Work Product privileged. Similarly, I will look to Clifford Brown as the Client who will pay the charges for this work, including the charges for my deposition, work needed in preparation for the deposition, and additional work that may be required subsequent to my deposition, all in accordance with the Conditions previously submitted. Invoices will be sent to the following Client address.

Clifford & Brown  
 Bank of America Building  
 1430 Truxtun Avenue, Suite 900  
 Bakersfield CA 93301-5230  
 Attn: T. Mark Smith, Esq.  
 Re: Wm. Bolthouse Farms, Inc., v. City of Lancaster, Your File No. 2450-14

During our telephone conversation today, Richard Zimmer asked me to do the following: (1) contact Steve Gorelic by telephone to discuss the technical details of this matter; (2) review the January 2002 Lurdorf & Scalmanni report entitled Technical Memorandum, Ground-Water Basin and Subbasin Boundaries, Antelope Valley Ground-Water Basin, which I received from Mark Smith yesterday; (3) meet with Richard Zimmer and Stewart Johnston on 3/10/02 to discuss the matter; (4) attend the deposition of Joseph Scalmanni on 3/11/02 to assist; and (5) prepare for and be available for my own deposition on 3/29/02. I estimate that the charges for these services will be about \$15,000 to \$20,000, and therefore the oral authorization is for an estimated budget of \$20,000. Additional work following my deposition, or during the process of preparing for that deposition, will be charged an paid as described above.

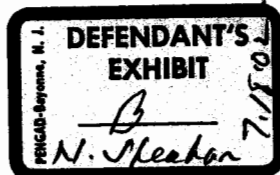
I look forward to meeting you and assisting you in this matter. If you have any questions, or if I can be of additional assistance, please call.

Sincerely,

Tom Sheahan

**N. Thomas Sheahan**  
 Principal Hydrogeologist  
 Geomatrix Consultants, Inc.

7/15/2002



Tel: 909-698-4989  
Fax: 909-698-4367  
Cell: 909-260-5722  
Email: [isheahan@geomatrix.com](mailto:isheahan@geomatrix.com)