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6 Attorneys for DIAMOND FARMING COMPANY,
7 a California corporation, CRYSTAL ORGANIC
8 FARMS, a limited liability company, GRIMMWAY
9 ENTERPRISES, INC., and LAPIS LAND COMPANY, LLC

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **IN AND FOR THE COUNTY OF LOS ANGELES**

11 Coordination Proceeding Special Title
12 (Rule 1550 (b))

13 ANTELOPE VALLEY GROUNDWATER
14 CASES

14 Included actions:

15 Los Angeles County Waterworks District No.
16 40 vs. Diamond Farming Company
17 Los Angeles Superior Court
18 Case No. BC 325201

18 Los Angeles County Waterworks District No.
19 40 vs. Diamond Farming Company
20 Kern County Superior Court
21 Case No. S-1500-CV 254348 NFT

21 Diamond Farming Company vs. City of
22 Lancaster
23 Riverside County Superior Court
24 Lead Case No. RIC 344436 [Consolidated
25 w/Case Nos. 344668 & 353840]

24 **AND RELATED CROSS-ACTIONS.**

Judicial Council Coordination No. 4408

Case No.: 1-05-CV-049053

**NOTICE OF NON-OPPOSITION TO
WOODS' CLASS SETTLEMENT BY
TEJON RANCHCORP, BOLTHOUSE
PROPERTIES, LLC, WM.
BOLTHOUSE FARMS, INC.,
DIAMOND FARMING COMPANY,
CRYSTAL ORGANIC FARMS,
GRIMMWAY ENTERPRISES, INC.
AND LAPIS LAND COMPANY, LLC**

26 NOTICE IS HEREBY GIVEN that TEJON RANCHCORP, BOLTHOUSE PROPERTIES,
27 LLC, WM. BOLTHOUSE FARMS, INC., DIAMOND FARMING COMPANY, CRYSTAL
28

**NOTICE OF NON-OPPOSITION TO WOODS' CLASS SETTLEMENT BY TEJON RANCHCORP, BOLTHOUSE
PROPERTIES, LLC, WM. BOLTHOUSE FARMS, INC., DIAMOND FARMING COMPANY, CRYSTAL ORGANIC
FARMS, GRIMMWAY ENTERPRISES, INC. AND LAPIS LAND COMPANY, LLC**

1 ORGANIC FARMS, GRIMMWAY ENTERPRISES, INC. AND LAPIS LAND COMPANY, LLC
2 do not oppose the Woods' Class settlement. This non-opposition is premised upon the
3 understanding that (a) the settlement is among those signatory to the settlement and does not bind
4 nor affect the rights of the parties to this notice of non-opposition, and (b) the characterization of
5 Water Code section 106 as creating a "priority" is a contractual understanding between the settling
6 parties, and does not change or alter the law nor the intended construction of Water Code section 106
7 as to the parties to this non-opposition.

8
9 Dated: October 21, 2013

LeBEAU • THELEN, LLP

10
11 By: 

12 BOB H. JOYCE
13 Attorneys for DIAMOND FARMING
14 COMPANY, a California corporation,
15 CRYSTAL ORGANIC FARMS, a limited
16 liability company, GRIMMWAY
17 ENTERPRISES, INC., and LAPIS LAND
18 COMPANY, LLC

16 Dated: October 21, 2013

CLIFFORD & BROWN

17
18 By: 

19 MARK SMITH
20 Attorneys for BOLTHOUSE PROPERTIES,
21 LLC and WM. BOLTHOUSE FARMS, INC.

22 Dated: October 21, 2013

KUHS & PARKER

23
24 By: _____

25 ROBERT KUHS
26 Attorneys for TEJON RANCHCORP

1 ORGANIC FARMS, GRIMMWAY ENTERPRISES, INC. AND LAPIS LAND COMPANY, LLC
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3 understanding that (a) the settlement is among those signatory to the settlement and does not bind
4 nor affect the rights of the parties to this notice of non-opposition, and (b) the characterization of
5 Water Code section 106 as creating a "priority" is a contractual understanding between the settling
6 parties, and does not change or alter the law nor the intended construction of Water Code section 106
7 as to the parties to this non-opposition.
8

9 Dated: October 21, 2013

LeBEAU • THELEN, LLP

10
11 By: _____

12 BOB H. JOYCE
13 Attorneys for DIAMOND FARMING
14 COMPANY, a California corporation,
15 CRYSTAL ORGANIC FARMS, a limited
16 liability company, GRIMMWAY
17 ENTERPRISES, INC., and LAPIS LAND
18 COMPANY, LLC

19 Dated: October 21, 2013

CLIFFORD & BROWN

20
21 By: _____

22 MARK SMITH
23 Attorneys for BOLTHOUSE PROPERTIES,
24 LLC and WM. BOLTHOUSE FARMS, INC.

25 Dated: October 21, 2013

KUHS & PARKER

26
27 By: _____

28 ROBERT KUHS
Attorneys for TEJON RANCHCORP

PROOF OF SERVICE

1 ANTELOPE VALLEY GROUNDWATER CASES
2 JUDICIAL COUNCIL PROCEEDING NO. 4408
3 CASE NO.: 1-05-CV-049053

4 I am a citizen of the United States and a resident of the county aforesaid; I am over the age
5 of eighteen years and not a party to the within action; my business address is: 5001 E. Commercenter
6 Drive, Suite 300, Bakersfield, California 93309. On October 21, 2013, I served the within **NOTICE**
7 **OF NON-OPPOSITION TO WOODS' CLASS SETTLEMENT BY TEJON RANCHCORP,**
8 **BOLTHOUSE PROPERTIES, LLC, WM. BOLTHOUSE FARMS, INC., DIAMOND**
9 **FARMING COMPANY, CRYSTAL ORGANIC FARMS, GRIMMWAY ENTERPRISES,**
10 **INC. AND LAPIS LAND COMPANY, LLC**

11 (BY POSTING) I am "readily familiar" with the Court's Clarification Order.
12 Electronic service and electronic posting completed through www.scefilng.org ; All papers filed
13 in Los Angeles County Superior Court and copy sent to trial judge and Chair of Judicial Council.

14 Los Angeles County Superior Court
15 111 North Hill Street
16 Los Angeles, CA 90012
17 Attn: **Department 1**
18 (213) 893-1014

19 Chair, Judicial Council of California
20 Administrative Office of the Courts
21 Attn: Appellate & Trial Court Judicial Services
22 (Civil Case Coordinator)
23 Carlotta Tillman
24 455 Golden Gate Avenue
25 San Francisco, CA 94102-3688
26 Fax (415) 865-4315

27 (BY MAIL) I am "readily familiar" with the firm's practice of collection and
28 processing correspondence for mailing. Under that practice it would be deposited with the U.S.
Postal Service on that same day with postage thereon fully prepaid at Bakersfield, California, in
the ordinary course of business.

(STATE) I declare under penalty of perjury under the laws of the State of
California that the above is true and correct, and that the foregoing was executed on October 21,
2013, in Bakersfield, California.

29 
30 LEQUETRA HANSEN