

1 ELLISON, SCHNEIDER & HARRIS L.L.P.
2 Anne J. Schneider (SBN: 72552)
3 Christopher M. Sanders (SBN: 195990)
4 2600 Capitol Avenue, Suite 400
5 Sacramento, California 95816
6 Telephone: (916) 447-2166
7 Facsimile: (916) 447-3512

EXEMPT FROM FILING FEES
UNDER GOVERNMENT CODE
SECTION 6103

8 Attorneys for Cross-Defendants County Sanitation Districts Nos. 14 and 20 of Los Angeles
9 County

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF LOS ANGELES – CENTRAL DISTRICT

12 **ANTELOPE VALLEY**
13 **GROUNDWATER CASES**

14 Included Actions:

15 Los Angeles County Waterworks District
16 No. 40 v. Diamond Farming Co.
17 Superior Court of California, County of
18 Los Angeles, Case No. BC 325 201

19 Los Angeles County Waterworks District
20 No. 40 v. Diamond Farming Co.
21 Superior Court of California, County of
22 Kern, Case No. S-1500-CV-254-348

23 Wm. Bolthouse Farms, Inc. v. City of
24 Lancaster, Diamond Farming Co. v. City
25 of Lancaster, Diamond Farming Co. v.
26 Palmdale Water Dist., Superior Court of
27 California, County of Riverside,
28 consolidated actions, Case Nos. RIC 353
840, RIC 344 436, RIC 344 668

Judicial Council Coordination No. 4408

CLASS ACTION

Santa Clara Case No.: 1-05-CV-049053

ASSIGNED FOR ALL PURPOSES TO:
Judge: Honorable Jack Komar

OBJECTIONS TO BOLTHOUSE NOTICE OF
DEPOSITION OF EXPERT PETE LEFFLER

Date: August 3, 2010
Time: 9:00 a.m.
Place: Lagerlof, Senecal, Gosney & Kruse
301 North Lake Avenue, 10th Floor
Pasadena, California 91101

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1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

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3 PLEASE TAKE NOTICE that COUNTY SANITATION DISTRICTS NOS. 14 AND 20
4 OF LOS ANGELES COUNTY (“Cross-Defendants”) object to Bolthouse Properties, LLC and
5 Wm. Bolthouse Farms, Inc. Notice of Deposition of Expert Peter Leffler dated July 16, 2010
6 (“Deposition Notice”), as follows:

7 Cross-Defendants object to the Deposition Notice on the grounds that it calls for
8 information outside the scope of the expert designation. Mr. Leffler has been designated by the
9 Public Water Suppliers for the limited purpose of providing expert testimony and rebuttal
10 testimony regarding characteristics of bedrock surrounding the Antelope Valley and potential
11 flows of groundwater through those materials into the Basin. Nothing in this objection, however,
12 limits the breadth or scope of future designation of this expert by Cross-Defendants, should this
13 designation be made.

14 SPECIFIC OBJECTIONS

15 Cross-Defendants object to the following document requests as enumerated in the Notice
16 of Deposition.

- 17 1. Cross-Defendants object to this document request to the extent it is outside the scope of
18 the expert designation and calls for information protected by the attorney work product doctrine.
- 19 2. Cross-Defendants object to this document request to the extent it is outside the scope of
20 the expert designation and calls for information protected by the attorney work product doctrine.
- 21 3. Cross-Defendants object to this document request to the extent it is outside the scope of
22 the expert designation and calls for information protected by the attorney work product doctrine.
- 23 4. Cross-Defendants object to this document request to the extent it is outside the scope of
24 the expert designation and calls for information protected by the attorney work product doctrine.
- 25 5. Cross-Defendants object to this document request to the extent it is outside the scope of
26 the expert designation and calls for information protected by the attorney work product doctrine.
- 27 6. Cross-Defendants object to this document request to the extent it is outside the scope of
28 the expert designation and calls for information protected by the attorney work product doctrine.

1 7. Cross-Defendants object to this document request to the extent it is outside the scope of
2 the expert designation and calls for information protected by the attorney work product doctrine.

3 8. Cross-Defendants object to this document request to the extent it is outside the scope of
4 the expert designation and calls for information protected by the attorney work product doctrine.

5 9. Cross-Defendants object to this document request to the extent it is outside the scope of
6 the expert designation and calls for information protected by the attorney work product doctrine.

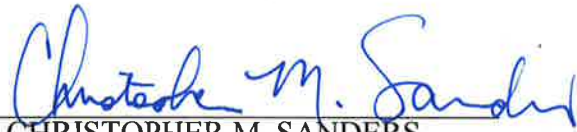
7 11. Cross-Defendants object to this document request to the extent it is outside the scope of
8 the expert designation and calls for information protected by the attorney work product doctrine.

9 12. Cross-Defendants object to this document request to the extent it is outside the scope of
10 the expert designation and calls for information protected by the attorney work product doctrine.

11 13. Cross-Defendants object to this document request to the extent it is outside the scope of
12 the expert designation and calls for information protected by the attorney work product doctrine.

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14 Dated: July 26, 2010

ELLISON, SCHNEIDER & HARRIS L.L.P.

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16 By: 
17 CHRISTOPHER M. SANDERS
18 Attorneys for Cross-Defendants
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PROOF OF SERVICE

I declare that:

I am employed in the County of Sacramento, State of California. I am over the age of eighteen years and am not a party to the within action. My business address is ELLISON, SCHNEIDER & HARRIS L.L.P.; 2600 Capitol Avenue, Suite 400; Sacramento, California 95816; telephone (916) 447-2166.

On July 26, 2010, I served the attached *Objections to Bolthouse Notice of Deposition of Expert Peter Leffler* by posting the document to the Santa Clara County Superior Court website in the regard to the Antelope Valley Groundwater matter.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on July 26, 2010, at Sacramento, California.


Patty Slomski