

January 14, 2014

**VIA DISCOVERY E-SERVICE**

Richard G. Zimmer  
CLIFFORD & BROWN, PC  
1430 Truxton Avenue, Suite 900  
Bakersfield, CA 93301-5230

Copy All Counsel

Re: January 13, 2014 Letter re Non-Responses to Bolthouse Discovery  
*Antelope Valley Groundwater Adjudication*  
Santa Clara Superior Court Case No. 1-05-CV-049053  
Judicial Council Coordination Proceeding No. 4408

Dear Mr. Zimmer:

I have received and reviewed your above-referenced letter on behalf of your clients, Bolthouse Properties, LLC and Wm. Bolthouse Farms, Inc., in which it is asserted that responses were not timely filed to your clients' Special Interrogatories on behalf of seventeen of this firm's twenty-one clients, parties to the above-referenced groundwater adjudication.

Specifically, it is asserted that Adams Bennett Investments, LLC, Antelope Park Mutual Water Co., Aqua-J Mutual Water Co. (incorrectly identified as "Aqua 3 Mutual Water Company"), Averydale Mutual Water Co., Baxter Mutual Water Co., Bleich Flat Mutual Water Co., Colorado Mutual Water Co., Eldorado Mutual Water Co., Evergreen Mutual Water Co., Land Projects Mutual Water Co., Landale Mutual Water Co., Shadow Acres Mutual Water Co., Sundale Mutual Water Co., Sunnyside Farms Mutual Water Co., Tierra Bonita Mutual Water Co., Westside Park Mutual Water Co., and White Fence Farms Mutual Water Co., Inc. did not timely respond.

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In fact, proper Responses were timely posted to the Court's website for Adams Bennett Investments, LLC on January 9, 2014 as Document No. 7885; and for Antelope Park Mutual Water Co., Aqua-J Mutual Water Co., Averydale Mutual Water Co., Baxter Mutual Water Co., Bleich Flat Mutual Water Co., Colorado Mutual Water Co., Eldorado Mutual Water Co., Evergreen Mutual Water Co., Land Projects Mutual Water Co., Landale Mutual Water Co., Shadow Acres Mutual Water Co., Sundale Mutual Water Co., Sunnyside Farms Mutual Water Co., Tierra Bonita Mutual Water Co., Westside Park Mutual Water Co., and White Fence Farms Mutual Water Co., Inc., under the combined Responses for the Antelope Valley United Mutuals Group (of which these sixteen mutual water companies are the identified members), on January 10, 2014 as Document No. 7894.

The Responses from Miracle Improvement Corporation dba Golden Sands Mobile Home Park and dba Golden Sands Trailer Park were reflected under both Miracle Improvement Corporation and Golden Sands Mobile Home Park, and were filed on January 3, 2014, as Document No. 7846.

Please correct your records accordingly.

Thank you.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael Duane Davis". The signature is stylized with a large, sweeping initial "M" and a long, horizontal flourish extending to the right.

Michael Duane Davis, of  
GRESHAM SAVAGE  
NOLAN & TILDEN, PC

MDD:dms

cc: Clients