

RICHARD G. ZIMMER, ESQ. - SBN 107263  
T. MARK SMITH, ESQ. - SBN 162370  
CLIFFORD & BROWN  
A Professional Corporation  
Attorneys at Law  
Bank of America Building  
1430 Truxtun Avenue, Suite 900  
Bakersfield, CA 93301-5230  
Tel: (661) 322-6023 Fax: (661) 322-3508

Attorneys for BOLTHOUSE PROPERTIES, LLC  
and WM. BOLTHOUSE FARMS, INC.

SUPERIOR COURT OF CALIFORNIA  
COUNTY OF LOS ANGELES – CENTRAL DISTRICT

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COORDINATION PROCEEDING  
SPECIAL TITLE (Rule 1550(b))

ANTELOPE VALLEY GROUNDWATER  
CASES

INCLUDED ACTIONS:

LOS ANGELES COUNTY WATERWORKS  
DISTRICT NO. 40 v. DIAMOND FARMING  
COMPANY, et al.,  
Los Angeles Superior Court Case No. BC325201

LOS ANGELES COUNTY WATERWORKS  
DISTRICT NO. 40 v. DIAMOND FARMING  
COMPANY, et al.,  
Kern County Superior Court Case No. S-1500-  
CV-254348

DIAMOND FARMING COMPANY, and W.M.  
BOLTHOUSE FARMS, INC., v. CITY OF  
LANCASTER, et al.,  
Riverside Superior Court Case No. RIC 344436  
[c/w case no. RIC 344668 and 353840]

AND RELATED ACTIONS.

JUDICIAL COUNCIL COORDINATION PROCEEDING  
No. 4408

CASE NO. 1-05-CV-049053  
*Action Filed: October 26, 2005*

**DESIGNATION OF EXPERT WITNESSES  
AND PERCIPIENT WITNESSES BY  
BOLTHOUSE PROPERTIES, LLC, AND  
WM. BOLTHOUSE FARMS, INC.**

**[Code of Civil Procedure § 2034.260 and  
2034.310]**

**Trial Date: October 7, 2014  
Time: 9:00 a.m.  
Dept: TBA**

BOLTHOUSE PROPERTIES, LLC and WM. BOLTHOUSE FARMS, INC. (hereinafter  
“BOLTHOUSE”) do not presently intend to offer the testimony of any expert witness in this case-in-  
chief in this phase of trial. BOLTHOUSE reserves any and all rights set forth in Code of Civil

1 Procedure section 2034.260, et seq., concerning the retention and use of expert witnesses, and hereby  
2 designates, as those expert witnesses who may be called to testify at time of trial in this matter, all  
3 expert witnesses identified by other parties to the case and who have been deposed pursuant to Code  
4 of Civil Procedure section 2034.260. This does not include expert witnesses to impeach the  
5 testimony of any expert witness offered by any other party at trial or rebuttal expert witnesses.

6 BOLTHOUSE expressly reserves the rights provided under Code of Civil Procedure section  
7 2034, et seq., relative to the right to supplementally designate experts and the rights set forth under  
8 Code of Civil Procedure section 2034.310.

9 FURTHER, it is unclear what percipient witnesses will be needed in this phase of trial and  
10 BOLTHOUSE hereby reserves its rights to supplementally designate percipient witnesses as their  
11 identities become known. Should BOLTHOUSE ascertain the name of any additional witness prior  
12 to trial, BOLTHOUSE will immediately identify said individual and make him/her available for  
13 deposition upon reasonable notice and at a time and place convenient for all parties. This does not  
14 include percipient witnesses to impeach the testimony of any percipient witness offered by any other  
15 party at trial or rebuttal witnesses.

16 DATED: September 9, 2014

CLIFFORD & BROWN

17  
18 By 

19 RICHARD G. ZIMMER, ESQ.

T. MARK SMITH, ESQ.

20 Attorneys for BOLTHOUSE PROPERTIES, LLC  
21 and WM. BOLTHOUSE FARMS, INC.  
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**PROOF OF SERVICE (C.C.P. §1013a, 2015.5)**  
***Antelope Valley Groundwater Cases***  
***Judicial Counsel Coordination Proceeding No. 4408***  
***Santa Clara County Superior Court Case No. 1-05-CV-049053***

I am employed in the County of Kern, State of California. I am over the age of 18 and not a party to the within action; my business address is 1430 Truxtun Avenue, Suite 900, Bakersfield, CA 93301.

On September 9, 2014, I served the foregoing document(s) entitled:

**DESIGNATION OF EXPERT WITNESSES AND PERCIPIENT WITNESSES BY  
BOLTHOUSE PROPERTIES, LLC, AND WM. BOLTHOUSE FARMS, INC.**

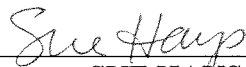
by placing the document listed above to the Santa Clara Superior Court website in regard to the Antelope Valley Groundwater Matter. All parties listed on the Santa Clara Superior Court in regard to the Antelope Valley Groundwater Matter are hereby incorporated within by this reference.

X BY SANTA CLARA SUPERIOR COURT E-FILED IN COMPLEX  
LITIGATION PURSUANT TO CLARIFICATION ORDER DATED  
OCTOBER 27, 2005.

Executed on September 9, 2014, at Bakersfield, California.

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

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

  
\_\_\_\_\_  
SUE HAYS  
{2455-2}