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Attorneys for Defendant and Cross-Complainant Tejon Ranchcorp

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES

**ANTELOPE VALLEY  
GROUNDWATER CASES**

Included Actions:

Los Angeles County Waterworks District No. 40  
v. Diamond Farming Co., Superior Court of  
California, County of Los Angeles, Case No. BC  
325 201; Los Angeles County Waterworks  
District No. 40 v. Diamond Farming Co., Superior  
Court of California, County of Kern, Case No. S-  
1500-CV-254-348; Wm. Bolthouse Farms, Inc.  
v. City of Lancaster, Diamond Farming Co. v.  
City of Lancaster, Diamond Farming Co. v.  
Palmdale Water Dist., Superior Court of  
California, County of Riverside, Case Nos. RIC  
353840, RIC 344436, RIC 344668

) Judicial Council Coordination Proceeding No.  
) 4408

) Assigned to The Honorable Jack Komar

) **TEJON RANCHCORP'S CONSULTANTS'  
EXECUTED CONFIDENTIALITY  
AGREEMENTS**

Pursuant to the Protective Order Re Disclosure and Confidentiality of Well Reports dated  
March 8, 2007, Tejon Ranchcorp hereby files the executed Confidentiality Agreements of its  
consultants: Richard Rhone, Ronald Schnabel, and E. John List.

Dated: March 22, 2007

NOSSAMAN, GUTHNER, KNOX & ELLIOTT, LLP  
FREDRIC A. FUDACZ  
HENRY S. WEINSTOCK

By: 

HENRY S. WEINSTOCK

Attorneys for Tejon Ranchcorp

**CONFIDENTIALITY AGREEMENT PURSUANT TO PROTECTIVE ORDER**

I certify that I have read and understand the confidentiality restrictions set forth in the Protective Order Re Disclosure and Confidentiality of Well Reports in the Antelope Valley Groundwater Cases (Judicial Council Coordination Proceeding #4408). I agree to comply with and be bound by the provisions of this Protective Order. I will not disclose confidential well completion reports or the data contained therein except as permitted in the Protective Order or as subsequently allowed by the Court. I will keep all copies of the well reports and data confidential and will not allow them to be disclosed to the general public. I will use the above well reports and data only for purposes of this litigation.

I hereby consent to the jurisdiction at the Los Angeles County Superior Court with respect to any proceedings to enforce the Protective Order and this Confidentiality Agreement. I understand that any violation of this Protective Order and this Confidentiality Agreement may subject me to appropriate sanctions, possibly including monetary sanctions and contempt of Court.

Date: March 22, 2007

Richard A. Rhone  
(Signature)

RICHARD A. RHONE  
(Print Name)

CONSULTING ENGINEER, TOLON ENGINEERING  
Title and Party Affiliation

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Date: March 22, 2007

E. John List  
(Signature)

E. John List  
(Print Name)

Principal Consultant, Flow Science  
Title and Party Affiliation

CONSULTANT TO TOWN RASCAL CORP.

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EXHIBIT A TO PROTECTIVE ORDER RE DISCLOSURE AND CONFIDENTIALITY OF WELL REPORTS

1 **PROOF OF SERVICE**

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3 The undersigned declares:

4 I am employed in the County of , State of California. I am over the age of 18 and am not a party  
5 to the within action; my business address is c/o Nossaman, Guthner, Knox & Elliott, LLP, 445 S.  
6 Figueroa Street, 31st Floor Los Angeles, California 90071-1602.

7 On **March 22, 2007**, I served the foregoing **TEJON RANCHCORP'S CONSULTANTS'**  
8 **EXECUTED CONFIDENTIALITY AGREEMENTS** on all interested parties:

9 (X) (By U.S. Mail) On the same date, at my said place of business, said correspondence was sealed  
10 and placed for collection and mailing following the usual business practice of my said employer.  
11 I am readily familiar with my said employer's business practice for collection and processing of  
12 correspondence for mailing with the United States Postal Service, and, pursuant to that practice,  
13 the correspondence would be deposited with the United States Postal Service, with postage  
14 thereon fully prepaid, on the same date at Los Angeles, California, addressed to:

15 Honorable Jack Komar  
16 Judge of the Superior Court of California  
17 County of Santa Clara  
18 191 North First Street, Department 17C  
19 San Jose, CA 95113

20 (X) (By E-Filing) I posted the document(s) listed above to the Santa Clara County Superior Court  
21 website in regard to the Antelope Valley Groundwater matter in compliance with the Court's  
22 electronic posting instructions and the Court's Clarification Order dated October 27, 2005.

23 ( ) (By Overnight Express) I served a true and correct copy by Overnight Express, for delivery on the  
24 next business day. Each copy was enclosed in an envelope or package designated by the express  
25 service carrier; deposited in a facility regularly maintained by the express service carrier or  
26 delivered to a courier or driver authorized to receive documents on its behalf; with delivery fees  
27 paid or provided for; addressed as shown on the service list.

28 Executed on **March 22, 2007** at Los Angeles, California.

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

( ) (FEDERAL) I declare under penalty of perjury under the laws of the United States of America  
that the foregoing is true and correct.

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Mitchi Shibata