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Attorneys for Bolthouse Properties, LLC and Wm. Bolthouse Farms,  
Inc.

SUPERIOR COURT OF CALIFORNIA

COUNTY OF SANTA CLARA

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COORDINATION PROCEEDING

SPECIAL TITLE (Rule 1550(b)) ) Judicial Council Coordination  
Proceeding No. 4408

ANTELOPE VALLEY GROUNDWATER  
CASES )

CASE NO. 1-05-CV-049053

INCLUDED ACTIONS:

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

**AMENDED POST-COUNSEL CONFERENCE  
CALL OF SEPTEMBER 5, 2008  
REGARDING NOTICE OF DEPOSITIONS  
OF EXPERTS**

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

Phase 2 Trial Date: October 6,  
2008

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]

ROSAMOND COMMUNITY SERVICES  
DISTRICT,

CROSS-COMPLAINANT,

1 TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on the dates, times and locations  
3 listed below, the depositions of the individuals listed below will  
4 be taken before a Certified Shorthand Reporter and, if for any  
5 reason the taking of said depositions are not completed on said  
6 day, the taking of the depositions will be continued from day to  
7 day, Sundays and holidays excepted, until completed.

8 The persons whose depositions will be taken and the dates and  
9 times are as follows:

- |    |                              |                           |
|----|------------------------------|---------------------------|
| 10 | 1. RAM ARORA, PH.D.          | SEPTEMBER 15, 2008        |
| 11 |                              | 9:00 A.M.                 |
| 12 |                              | Best, Best & Krieger      |
| 13 |                              | 3500 Porsche Way,         |
|    |                              | Suite 200                 |
|    |                              | Ontario, CA 91764         |
|    |                              | (909) 989-8584            |
| 14 | 2. PMK OF LOS ANGELES COUNTY | SEPTEMBER 17, 2008        |
| 15 | WATERWORKS, PALMDALE WATER   | 9:00 A.M.                 |
| 16 | DISTRICT AND QUARTZ HILLS    | Lewis, Brisbois, Bisgaard |
| 17 | WATER DISTRICT               | & Smith, LLP              |
|    |                              | 221 North Figueora        |
|    |                              | Street, Suite 1200        |
|    |                              | Los Angeles, CA 9001      |
|    |                              | (213) 250-1800            |
| 18 | 3. KENNETH UTLEY             | SEPTEMBER 23, 2008        |
| 19 |                              | 9:00 A.M.                 |
| 20 |                              | Kronick, Moskowvitz,      |
| 21 |                              | Tiedemann & Girard        |
| 22 |                              | 400 Capitol Mall,         |
|    |                              | 27 <sup>th</sup> Floor    |
|    |                              | Sacramento, CA 95814      |
|    |                              | (916) 321-4500            |
| 23 | 4. JOSEPH SCALMANINI         | September 24, 2008        |
| 24 |                              | 9:00 A.M.                 |
| 25 |                              | Kronick, Moskowvitz,      |
| 26 |                              | Tiedemann & Girard        |
|    |                              | 400 Capitol Mall,         |
|    |                              | 27 <sup>th</sup> Floor    |
|    |                              | Sacramento, CA 95814      |
|    |                              | (916) 321-4500            |

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5. RICHARD RHONE

SEPTEMBER 25, 2008  
9:00 A.M.  
Best, Best & Krieger  
3500 Porsche Way,  
Suite 200  
Ontario, CA 91764  
(909) 989-8584

6. JOHN LIST

SEPTEMBER 26, 2008  
9:00 A.M.  
Best, Best & Krieger  
3500 Porsche Way,  
Suite 200  
Ontario, CA 91764  
(909) 989-8584

7. JUNE OBERDORFER

SEPTEMBER 27, 2008  
9:00 A.M.  
Best, Best & Krieger  
3500 Porsche Way,  
Suite 200  
Ontario, CA 91764  
(909) 989-8584

8. TIMOTHY DURBIN

SEPTEMBER 29, 2008  
9:00 A.M.  
Kronick, Moskowitz,  
Tiedemann & Girard  
400 Capitol Mall,  
27<sup>th</sup> Floor  
Sacramento, CA 95814  
(916) 321-4500

9. JOHN LAMBIE

September 30, 2008  
9:00 A.M.  
Kronick, Moskowitz,  
Tiedemann & Girard  
400 Capitol Mall,  
27<sup>th</sup> Floor  
Sacramento, CA 95814  
(916) 321-4500

10. DENNIS WILLIAMS

OCTOBER 1, 2008  
9:00 A.M.  
Best, Best & Krieger  
3500 Porsche Way,  
Suite 200  
Ontario, CA 91764  
(909) 989-8584

11. TOM SHEAHAN

OCTOBER 1, 2008  
1:30 P.M.  
Best, Best & Krieger  
3500 Porsche Way,  
Suite 200  
Ontario, CA 91764  
(909) 989-8584

12. JASON SUN

OCTOBER 2, 2008  
9:00 A.M.  
Best, Best & Krieger  
3500 Porsche Way,  
Suite 200  
Ontario, CA 91764  
(909) 989-8584

**FURTHER PLEASE TAKE NOTICE** that each deponent set forth herein above is requested to produce at the time of the deposition the following:

1. Deponent's entire file concerning the above-captioned lawsuit.
2. Any and all writings prepared by or on behalf of said deponent or anyone working at the direction of said deponent which in any way pertains to the review, analysis, opinions, conclusions, or beliefs of said deponent with regard to the subject matter of this litigation;
3. Any and all writings received and/or reviewed by said deponent pertaining to the subject matter of this litigation;
4. Any and all handwritten notes, field notes, calculations or other writings prepared by or on behalf of said deponent or by someone at the direction of said deponent pertaining to the subject matter of this litigation;
5. Any and all photographs, videotapes, scans, micrographs, or other such recording reviewed, received, analyzed, prepared by, considered, and/or relied upon by said deponent which pertains to the subject matter of this litigation;

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6. Any and all books, articles, treatises, reports, or other writings which in any way form the basis for any opinion, conclusion or analysis of said deponent relating to the subject matter of this litigation;
7. Any and all writings pertaining to the billing and amount of time spent by said deponent or others under the direction of said deponent in working on any matter pertaining to the subject of this litigation. This includes but is not limited to any and all timesheets or billing statements.
8. Any and all reports, conclusions, opinions, and drafts of the same prepared by deponent in connection with the above-captioned lawsuit.
9. Any "engagement letter" or similar instructions received by deponent in connection with the above-captioned lawsuit.
10. Your Curricula Vitae.
11. All documents, depositions, scientific, technical or professional texts, journals, or any other "writings" (as defined by California Evidence Code, Section 250) including any documents prepared by any present or former party to this action which the deponent read, referred to, considered or relied upon in preparing to testify in deposition or at trial, of this action.
12. All documents, depositions, scientific, technical or professional texts, journals, or any other action in which you provided testimony, either by deposition or in trial, as a percipient and/or expert witness, which you have read, referred to, considered or relied upon in preparing to testify or in testifying, in deposition or at trial, in this action.
13. All documents, correspondence, depositions, deposition summaries, memoranda, or any other "writing" (as defined by California Evidence Code, Section 250), prepared by you or sent and/or received from plaintiff's counsel which retained you concerning the subject matter of the issues in this case, or concerning any of the matters referred to in any of the aforementioned categories of this list of documents to be produced at deposition.
14. A list of all cases by name, venue, and date in which you have testified at deposition and at trial.

1 Expert witness fees will be tendered at the time of the  
2 commencement of the deposition pursuant to CCP §2034.430, et seq.

3  
4 DATED: September 8, 2008

5 CLIFFORD & BROWN

6  
7 By: 

RICHARD G. ZIMMER, ESQ.

T. MARK SMITH, ESQ.

Attorneys for

BOLTHOSUE PROPERTIES, LLC and

WM. BOLTHOUSE FARMS, INC.

**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, Bakersfield, CA 93301.

On September 9, 2008, I served the foregoing document(s) entitled:

**AMENDED POST-COUNSEL CONFERENCE CALL ON SEPTEMBER 5, 2008  
REGARDING NOTICE OF DEPOSITIONS OF EXPERTS**

— by placing the true copies thereof enclosed in sealed envelopes addressed as stated on the attached mailing list.

— by placing \_ the original, \_ a true copy thereof, enclosed in a sealed enveloped addressed as follows:

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

Executed on September 9, 2008, 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.

  
\_\_\_\_\_  
NANETTE MAXEY  
2455-2