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Attorneys for Bolthouse Properties, LLC

SUPERIOR COURT OF CALIFORNIA

COUNTY OF SANTA CLARA

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|------------------------------------|---|--|
| COORDINATION PROCEEDING |) | Judicial Council Coordination |
| SPECIAL TITLE (Rule 1550(b)) |) | Proceeding No. 4408 |
| |) | |
| ANTELOPE VALLEY GROUNDWATER |) | CASE NO. 1-05-CV-049053 |
| CASES |) | |
| |) | |
| INCLUDED ACTIONS: |) | |
| |) | JOINDER IN MOTION BY TEJON |
| LOS ANGELES COUNTY WATERWORKS |) | RANCHCORP AND OTHER PARTIES FOR |
| DISTRICT NO. 40 v. DIAMOND |) | PROTECTIVE ORDER RE DISCLOSURE |
| FARMING COMPANY, et al., |) | AND CONFIDENTIALITY OF WELL |
| Los Angeles Superior Court |) | DATA AND OTHER PRIVATE |
| Case No. BC325201 |) | INFORMATION |
| |) | |
| 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 |) | DATE: December 15, 2006 |
| W.M. BOLTHOUSE FARMS, INC., v. |) | TIME: 9:00 a.m. |
| CITY OF LANCASTER, et al., |) | DEPT: D-1, Room 534 |
| Riverside Superior Court |) | |
| Case No. RIC 344436 [c/w case no. |) | |
| RIC 344668 and 353840] |) | Location: |
| |) | |
| ROSAMOND COMMUNITY SERVICES |) | Los Angeles Superior Court |
| DISTRICT, |) | Central District |
| CROSS-COMPLAINANT, |) | 111 North Hill Street |
| |) | Los Angeles, CA 90012 |

1 TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that Bolthouse Properties, LLC, hereby
3 joins in the Motion by Tejon Ranchcorp and Other Parties for
4 Protective Order re Disclosure and Confidentiality of Well Data
5 and Other Private Information subject to the following
6 qualification.

7 Bolthouse Properties, LLC joins in the Motion on the grounds
8 stated in the Motion filed by Tejon Ranchcorp and hereby
9 incorporates that motion as if set forth at length herein
10 verbatim. If the records are not disclosed, then no party should
11 be entitled to use such data for any purpose regardless of the
12 source of the data.

13 Bolthouse Properties, LLC joins in the Motion for disclosure
14 subject to the qualification that any and all documents obtained
15 as a result of the protective order and disclosure, will not be
16 made admissible as a result of the joinder in the motion. Any
17 and all appropriate objections to the information obtained
18 pursuant to the protective order and disclosure still are
19 available to any party choosing to exercise such objection at
20 trial or for any other purpose. The protective order simply will
21 allow production of the documents pursuant to Court order in
22 light of the objection to disclosure of such data and will
23 provide for the confidentiality of such data with the exception
24 of potential use in this matter.

25 Based upon the qualifications set forth above, Bolthouse
26 Properties, LLC hereby joins in the Motion by Tejon Ranchcorp for

1 Protective Order re Disclosure and Confidentiality of Well Data
2 and Other Private Information.

3
4 DATED: December , 2006

5 Respectfully submitted,

6 CLIFFORD & BROWN

7
8 By: 

RICHARD O. ZIMMER, ESQ.

T. MARK SMITH, ESQ.

Attorneys for

BOLTHOUSE PROPERTIES, LLC

