1 2 3 4 5 6 7	RICHARD G. ZIMMER - SBN 107263 T. MARK SMITH - SBN 162370 CLIFFORD & BROWN A Professional Corporation Attorneys at Law Bank of America Building 1430 Truxtun Avenue, Suite 900 Bakersfield, CA 93301-5230 (661) 322-6023 (661) 322-3508 fax Attorneys for Bolthouse Properties	es, LLC
8	SUPERIOR COURT OF CALIFORNIA	
9	COUNTY OF SANTA CLARA	
10	*	* *
11) Judicial Council Coordination
12	ANTELOPE VALLEY GROUNDWATER) Proceeding No. 4408)) CASE NO. 1-05-CV-049053
13	CASES) CASE NO. 1-03-CV-049033
14	INCLUDED ACTIONS:))) JOINDER IN MOTION BY TEJON
15	LOS ANGELES COUNTY WATERWORKS DISTRICT NO. 40 v. DIAMOND) RANCHCORP AND OTHER PARTIES FOR) PROTECTIVE ORDER RE DISCLOSURE
16	FARMING COMPANY, et al., Los Angeles Superior Court	AND CONFIDENTIALITY OF WELL DATA AND OTHER PRIVATE
17	Case No. BC325201	INFORMATION
18	LOS ANGELES COUNTY WATERWORKS DISTRICT NO. 40 v. DIAMOND))
19	FARMING COMPANY, et al., Kern County Superior Court))
20	Case No. S-1500-CV-254348	
21	DIAMOND FARMING COMPANY, and W.M. BOLTHOUSE FARMS, INC., v.	DATE: December 15, 2006 TIME: 9:00 a.m.
22	CITY OF LANCASTER, et al., Riverside Superior Court) DEPT: D-1, Room 534
23	Case No. RIC 344436 [c/w case no. RIC 344668 and 353840])) Location:
24	ROSAMOND COMMUNITY SERVICES)) Los Angeles Superior Court
25	DISTRICT, CROSS-COMPLAINANT,	Central District 111 North Hill Street
26) Los Angeles, CA 90012

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

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

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

Based upon the qualifications set forth above, Bolthouse 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	/-M
4	DATED: December 2006
5	Respectfully submitted,
6	CLIFFORD & BROWN
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8	By: RICHARD S. ZIMMER, ESQ.
9	T. MARK SMITH, ESQ.
10	Attorneys for BOLTHOUSE PROPERTIES, LLC
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PROOF OF SERVICE

STATE OF CALIFORNIA COUNTY OF KERN:

I am a resident of the County aforesaid; I am over the age of eighteen years and not a party to the within entitled action; my business address is 1430 Truxtun Avenue, Suite 900, Bakersfield, California, 93301.

On December 6, 2006, I served the **JOINDER IN MOTION BY TEJON** RANCHCORP AND OTHER PARTIES FOR PROTECTIVE ORDER RE DISCLOSURE AND CONFIDENTIALITY OF WELL DATA AND OTHER PRIVATE INFORMATION on the interested parties in said action.

(xx) BY SANTA CLARA SUPERIOR COURT E-FILING IN COMPLEX LITIGATION PURSUANT TO CLARIFICATION ORDER DATED OCTOBER 27, 2005.

-) VIA FACSIMILE [C.C.P. § 1013(e)]; The telephone number of the sending facsimile machine was (661) 322-3508. telephone(s) number of the receiving facsimile machine(s) is listed below. The Court, Rule 2004 and no error was reported by Pursuant to California Rules of Court, Rule the machine. 2006(d), the machine was caused to print a transmission record of the transmission, a copy of which is attached hereto.
- () VIA OVERNIGHT DELIVERY on the date below stated, pursuant to CCP \$1013(c)(d), I deposited such envelope with delivery fees fully prepaid with CALIFORNIA OVERNIGHT.
- () BY MAIL I am readily familiar with the business' practice for collection and processing of correspondence and documents for mailing with the United States Postal Service. Under that practice, the correspondence and documents would be deposited with the United States Postal Service that same day, with postage thereon fully prepaid, in the ordinary course of business at Bakersfield, California.

I declare, under penalty of perjury under the laws of the State of California, that the foregoing is true and correct.

Executed on December 6, 2006, at Bakersfield, California.

Kese Mary N ROSEMARY

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