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7
                         SUPERIOR COURT OF CALIFORNIA
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9
                            COUNTY OF SANTA CLARA
10
11
    COORDINATION PROCEEDING
                                         Judicial Council Coordination Proceeding
                                        ) No. 4408
    SPECIAL TITLE (Rule 1550(b))
12
13
    ANTELOPE VALLEY GROUNDWATER ) CASE NO. 1-05-CV-409053
    CASES
14
    INCLUDED ACTIONS:
15
    LOS
               ANGELES
                              COUNTY
16
    WATERWORKS DISTRICT NO. 40 v.
17
    DIAMOND FARMING COMPANY, et al.,
                                        ) BOLTHOUSE PROPERTIES, LLC'S
    Los Angeles Superior Court Case No.
                                          AND WM. BOLTHOUSE FARMS,
18
    BC325201
                                          INC.'S ADDITIONAL ARGUMENT
                                          AND JOINDER IN TEJON
19
    LOS
               ANGELES
                              COUNTY ) RANCHCORP'S OPPOSITION TO
    WATERWORKS DISTRICT NO. 40 v. ) UNITED STATES' REQUEST TO
20
    DIAMOND FARMING COMPANY, et al.,
                                        ) AMEND CASE MANAGEMENT
21
    Kern County Superior Court Case No. S-
                                       ) ORDER OF MARCH 22, 2010
    1500-CV-254348
22
    DIAMOND FARMING COMPANY, and
23
    W.M. BOLTHOUSE FARMS, INC., v.
24
    CITY OF LANCASTER, et al.,
    Riverside Superior Court
25
    Case No. RIC 344436 [c/w case no. RIC
    344668 and 353840]
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27
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    111
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BOLTHOUSE PROPERTIES, LLC'S AND WM. BOLTHOUSE FARMS, INC.'S ADDITIONAL ARGUMENT AND JOINDER IN TEJON RANCHCORP'S OPPOSITION TO UNITED STATES' REQUEST TO AMEND CASE MANAGEMENT ORDER OF MARCH 22, 2010

3.

TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

Bolthouse Properties, LLC and Wm. Bolthouse Farms, Inc. join in the Opposition of Tejon Ranchcorp to the request of the United States to amend Case Management Order of March 22, 2010.

These responding parties object to more detailed reports beyond that required by Code. Although the purveyors had their experts involved in a Technical Committee for some time, and may be able to create a detailed report, including all their conclusions, the other defendants have not. Even if this could be done, attempting to attach all supporting documents and include a discussion of all arguments would be virtually impossible without substantial periods of time to develop these opinions. Finally, attempting to do so would be extremely time consuming and expensive. Accordingly, these responding defendants object to using the Federal procedure rather than the California procedure.

DATED: April 30, 2010

Respectfully submitted.

CLIFFORD & BROWN

Bv

RICHARD G. ZIMMER, ESQ.

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

1	PROOF OF SERVICE (C.C.P. §1013a, 2015.5)
2	Antelope Valley Groundwater Cases Judicial Counsel Coordination Proceeding No. 4408 Santa Clara County Superior Court Case No. 1-05-CV-049053
3	, <u> </u>
4	I am employed in the County of Kern, State of California. I am over the age of 18 and not a
-5	party to the within action; my business address is 1430 Truxtun Avenue, Bakersfield, CA 93301.
6	On April 30, 2010, I served the foregoing document(s) entitled:
7	BOLTHOUSE PROPERTIES, LLC'S AND WM. BOLTHOUSE FARMS, INC.'S ADDITIONAL ARGUMENT AND JOINDER IN TEJON RANCHCORP'S OPPOSITION
8	TO UNITED STATES' REQUEST TO AMEND CASE MANAGEMENT ORDER OF MARCH 22, 2010
9	
10	by placing the true copies thereof enclosed in sealed envelopes addressed as stated on the attached mailing list.
11	by placing _ the original, _ a true copy thereof, enclosed in a sealed
12	enveloped addressed as follows:
13	X BY SANTA CLARA SUPERIOR COURT E-FILING IN COMPLEX LITIGATION PURSUANT TO CLARIFICATION ORDER DATED OCTOBER
14	27, 2005.
15	Executed on April 30, 2010, at Bakersfield, California.
16 17	X (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.
18	(Federal) I declare that I am employed in the office of a member of the Bar of
19	this Court at whose direction the service was made.
20	MANALL MINOIT
21	NANETTE MAXEY
22	2455-2
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