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

SUPERIOR COURT OF CALIFORNIA

COUNTY OF SANTA CLARA

* * *

COORDINATION PROCEEDING)	Judicial Council Coordination Proceeding
SPECIAL TITLE (Rule 1550(b)))	No. 4408
)	
ANTELOPE VALLEY GROUNDWATER)	CASE NO. 1-05-CV-409053
CASES)	
)	
INCLUDED ACTIONS:)	
)	
LOS ANGELES COUNTY)	
WATERWORKS DISTRICT NO. 40 v.)	
DIAMOND FARMING COMPANY, et al.,)	BOLTHOUSE PROPERTIES, LLC'S
Los Angeles Superior Court Case No.)	AND WM. BOLTHOUSE FARMS,
BC325201)	INC.'S RESPONSE/OBJECTION TO
)	LOS ANGELES COUNTY
LOS ANGELES COUNTY)	WATERWORKS DISTRICT NO. 40'S
WATERWORKS DISTRICT NO. 40 v.)	BRIEF RE APPORTIONMENT
DIAMOND FARMING COMPANY, et al.,)	
Kern County Superior Court Case No. S-)	
1500-CV-254348)	
)	
DIAMOND FARMING COMPANY, and)	DATE: March 22, 2011
W.M. BOLTHOUSE FARMS, INC., v.)	TIME: 10:00 a.m.
CITY OF LANCASTER, et al.,)	DEPT: 15 (CCW)
Riverside Superior Court)	
Case No. RIC 344436 [c/w case no. RIC)	
344668 and 353840])	
)	
)	

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1 TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

2 BOLTHOUSE PROPERTIES, LLC and WM. BOLTHOUSE FARMS, INC.
3 (hereinafter collectively referred to as "Bolthouse") object to Los Angeles County Waterworks
4 District No. 40's request for equitable apportionment of Willis Class Attorneys' fees. The
5 Willis Class did not request attorneys' fees against Bolthouse. Bolthouse has not been served
6 with any motion requesting attorneys' fees from Bolthouse. The Willis Class requested
7 attorneys' fees from the Public Water Suppliers as Prevailing Parties and based upon the
8 settlement the Class reached with the Public Water Suppliers. Bolthouse was not a party to the
9 litigation settled, nor was Bolthouse a party to the settlement of that litigation.

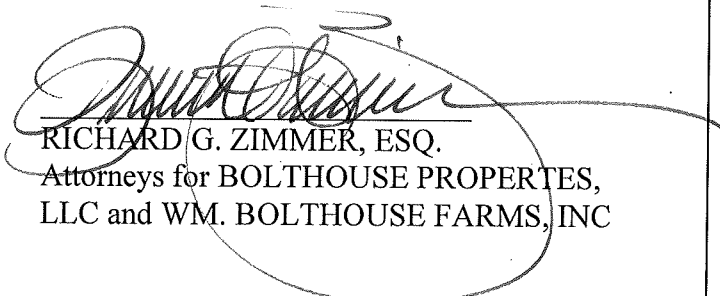
10 Los Angeles County cannot convert the Willis Class Motion for Attorneys' Fees into a
11 motion for attorneys' fees on behalf of Los Angeles County or any other entity. The suggestion
12 that the non-settling parties should somehow pay all or part of the Class attorneys' fees is
13 patently improper. Bolthouse, to the extent necessary, joins in other oppositions to the request
14 for apportionment filed with this Court.

15 DATED: March 21, 2011

16 Respectfully submitted.

17 CLIFFORD & BROWN

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19 By:

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21 RICHARD G. ZIMMER, ESQ.
22 Attorneys for BOLTHOUSE PROPERTIES,
23 LLC and WM. BOLTHOUSE FARMS, INC
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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 March 21, 2011, I served the foregoing document(s) entitled:

**BOLTHOUSE PROPERTIES, LLC'S AND WM. BOLTHOUSE FARMS, INC.'S
RESPONSE/OBJECTION TO LOS ANGELES COUNTY WATERWORKS DISTRICT
NO. 40'S BRIEF RE APPORTIONMENT**

— 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-FILED IN COMPLEX
LITIGATION PURSUANT TO CLARIFICATION ORDER DATED OCTOBER
27, 2005.

Executed on March 21, 2011, 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
NANETTE MAXEY
2455-2