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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)	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 OBJECTION TO SMALL
)	PUMPER CLASS' CASE
LOS ANGELES COUNTY)	MANAGEMENT CONFERENCE
WATERWORKS DISTRICT NO. 40 v.)	STATEMENT
DIAMOND FARMING COMPANY, et al.,)	
Kern County Superior Court Case No. S-)	
1500-CV-254348)	
)	
DIAMOND FARMING COMPANY, and)	DATE: October 12, 2011
W.M. BOLTHOUSE FARMS, INC., v.)	TIME: 10:00 a.m.
CITY OF LANCASTER, et al.,)	DEPT: 1
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") hereby object to Small Pumper Class' Case
4 Management Conference Statement which improperly communicates with this Court purported
5 details of the ongoing settlement discussions with Justice Robie. The purported details are
6 inaccurate and disruptive of the settlement process. Bolthouse requests an order from this
7 Court that details of the settlement process be kept confidential and not be disclosed to this
8 Court. Justice Robie has been working diligently to reach a settlement and we are making good
9 progress.

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11 DATED: October 7, 2011

Respectfully submitted.

12 CLIFFORD & BROWN

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15 By:


16 RICHARD G. ZIMMER, ESQ.
17 Attorneys for BOLTHOUSE PROPERTIES,
18 LLC and WM. BOLTHOUSE FARMS, INC
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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 October 7, 2011, I served the foregoing document(s) entitled:

**BOLTHOUSE PROPERTIES, LLC'S AND WM. BOLTHOUSE FARMS, INC.'S
OBJECTION TO SMALL PUMPER CLASS' CASE MANAGEMENT CONFERENCE
STATEMENT**

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

Executed on October 7, 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
2455-2