

1 RICHARD G. ZIMMER - SBN 107263
2 T. MARK SMITH - SBN 162370
3 CLIFFORD & BROWN
4 A Professional Corporation
5 Attorneys at Law
6 Bank of America Building
7 1430 Truxtun Avenue, Suite 900
8 Bakersfield, CA 93301-5230
9 (661) 322-6023

10 Attorneys for Bolthouse Properties, LLC

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES - CENTRAL DISTRICT

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COORDINATION PROCEEDING)	Judicial Council Coordination
SPECIAL TITLE (Rule 1550(b)))	Proceeding No. 4408
)	
ANTELOPE VALLEY GROUNDWATER)	Santa Clara Case No. 01-05-CV-049053
CASES)	Assigned to the Honorable Jack Komar
)	
INCLUDED ACTIONS:)	
)	
LOS ANGELES COUNTY WATERWORKS)	BOLTHOUSE PROPERTIES, LLC'S
DISTRICT NO. 40 v. DIAMOND)	CONSULTANT'S EXECUTED
FARMING COMPANY, et al.,)	CONFIDENTIALITY AGREEMENT
Los Angeles Superior Court)	
Case No. BC325201)	
)	
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)	
W.M. BOLTHOUSE FARMS, INC., v.)	
CITY OF LANCASTER, et al.,)	
Riverside Superior Court)	
Case No. RIC 344436 [c/w case)	
no. RIC 344668 and 353840])	
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1 Pursuant to the Protective Order Re Disclosure and
2 Confidentiality of Well Reports dated March 8, 2007, Bolthouse
3 Properties, LLC hereby files the executed Confidentiality
4 Agreement of its consultant: N. Thomas Sheahan.

5
6 DATED: July 5, 2007

CLIFFORD & BROWN

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8 By:


RICHARD G. ZIMMER, ESQ.
T. MARK SMITH, ESQ.
Attorneys for cross-defendant,
WM. BOLTHOUSE FARMS, INC.

1 CONFIDENTIALITY AGREEMENT PURSUANT TO PROTECTIVE ORDER

2 I certify that I have read and understand the confidentiality restrictions set forth in the
3 Protective Order Re Disclosure and Confidentiality of Well Reports in the Antelope Valley
4 Groundwater Cases (Judicial Council Coordination Proceeding #4408). I agree to comply with and be
5 bound by the provisions of this Protective Order. I will not disclose confidential well completion reports
6 or the data contained therein except as permitted in the Protective Order or as subsequently allowed by
7 the Court. I will keep all copies of the well reports and data confidential and will not allow them to be
8 disclosed to the general public. I will use the above well reports and data only for purposes of this
9 litigation.

10 I hereby consent to the jurisdiction at the Los Angeles County Superior Court with
11 respect to any proceedings to enforce the Protective Order and this Confidentiality Agreement. I
12 understand that any violation of this Protective Order and this Confidentiality Agreement may subject
13 me to appropriate sanctions, possibly including monetary sanctions and contempt of Court.

14
15
16 Date: July 5, 2007


(Signature)

17
18 N. Thomas Sheahan
(Print Name)

19 Vice President and
20 Principal Hydrogeologist
21 Title and Party Affiliation

22 Geomatrix Consultants, Inc.

23 Party Affiliation:

24 Bolthouse Properties, LLC
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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 July 6, 2007, I served the foregoing document(s) entitled:

BOLTHOUSE PROPERTIES, LLC'S CONSULTANT'S EXECUTED CONFIDENTIALITY AGREEMENT

XX 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 July 6, 2007, 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