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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	)	<i>Trial Date: 02/11/13</i>
	)	
INCLUDED ACTIONS:	)	
	)	
LOS ANGELES COUNTY	)	
WATERWORKS DISTRICT NO. 40 v.	)	
DIAMOND FARMING COMPANY, et al.,	)	<b>BOLTHOUSE PROPERTIES, LLC'S</b>
Los Angeles Superior Court Case No.	)	<b>AND WM. BOLTHOUSE FARMS,</b>
BC325201	)	<b>INC.'S WRITTEN EXCHANGE OF</b>
	)	<b>REQUIRED EXPERT WITNESS</b>
LOS ANGELES COUNTY	)	<b>INFORMATION PURSUANT TO C.C.P.</b>
WATERWORKS DISTRICT NO. 40 v.	)	<b>§2034.210 AND EXPERT WITNESS</b>
DIAMOND FARMING COMPANY, et al.,	)	<b>DECLARATION PURSUANT TO C.C.P.</b>
Kern County Superior Court Case No. S-	)	<b>§2034.260(c)</b>
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 PLEASE TAKE NOTICE that BOLTHOUSE PROPERTIES, LLC and WM.  
2 BOLTHOUSE FARMS, INC. make the following written exchange of required expert witness  
3 information pursuant to *Code of Civil Procedure* §2034.210.

4 BOLTHOUSE PROPERTIES, LLC and WM. BOLTHOUSE FARMS, INC.  
5 (hereinafter "BOLTHOUSE") do not currently intend to call any retained or non-retained  
6 experts other than as set forth below.

7 1. BOLTHOUSE reserves the right to call as expert witnesses once the Phase 4 issues are  
8 confirmed and/or clarified, and any and all of the experts who have been, or may subsequently  
9 be, designated by any other party.

10 2. BOLTHOUSE reserves the right pursuant to the *Code of Civil Procedure* § 2034.280,  
11 as well as any other constitutional, statutory and/or common law right it may have to later name  
12 experts before trial who are called to testify at trial, and who are not named, and whose  
13 testimony is needed to aid in the defense of this action and/or to refute and rebut the  
14 contentions and testimony of any other party's experts who may testify.

15 3. BOLTHOUSE reserves the right to call supplemental experts, rebuttal experts and  
16 experts to address issues raised by the Court or by other parties in the Phase 4 Trial.

17 4. BOLTHOUSE also reserves the right to supplement this designation.

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21 DATED: December 24, 2012

22 CLIFFORD & BROWN

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24 By:

25 RICHARD G. ZIMMER, ESQ.

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