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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) Trial Date: 02/11/13

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 FURTHER RESPONSE TO**
) **DISCOVERY ORDER FOR PHASE 4**
) **TRIAL**

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 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE** that Bolthouse Properties, LLC and Wm. Bolthouse Farms,
3 Inc. (hereinafter collectively "Bolthouse") hereby make the following further response to the
4 Phase 4 Trial and Discovery Order for Phase 4 Trial, without waiving the previous objections as
5 set forth in Bolthouse Properties, LLC's and Wm. Bolthouse Farms, Inc.'s Objection to Phase 4
6 Trial, Discovery Order for Phase 4 Trial and Subject to Objection, Attempt to Comply with the
7 Court's Discovery Order, and without waiving the right to further respond to the Discovery Order
8 in the future as additional information is obtained.

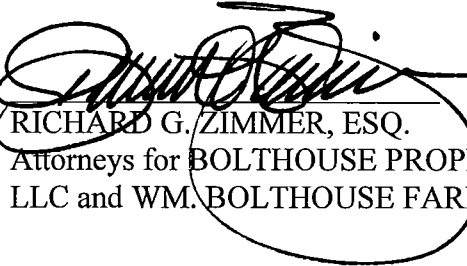
9 Attached hereto is additional information as requested in the Court Discovery Order and as
10 clarified by the Court in subsequent conferences regarding the Phase 4 trial issues. Bolthouse is in
11 the process of locating additional information and documents which may be responsive to the
12 Discovery Order and which may be necessary for depositions of Bolthouse witnesses or for the
13 Phase 4 Trial of this matter. These additional documents and/or information will be provided
14 as soon as possible as investigation and trial preparation by Bolthouse continues.

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17 DATED: January 15, 2013

Respectfully submitted,

18
19 CLIFFORD & BROWN

20 By:


21 RICHARD G. ZIMMER, ESQ.
22 Attorneys for BOLTHOUSE PROPERTIES,
23 LLC and WM. BOLTHOUSE FARMS, INC.
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BOLTHOUSE PROPERTIES, LLC**APNs with Acreage**

APN	SIZE IN ACRES
3032-004-020	6.41
3032-004-021	686.95
3075-011-017	40.00
3075-014-001	156.97
3075-015-001	1.00
3075-015-002	74.50
3075-015-003	40.00
3075-015-004	40.00
3075-015-005	40.00
3075-015-006	78.48
3075-015-007	38.48
3075-016-001	153.50
3075-016-002	76.71
3075-016-003	61.03
3075-016-004	18.49
3075-017-010	0.01
3075-017-011	2.00
3075-019-001	79.09
3075-019-002	19.77
3075-019-005	19.54
3075-019-006	20.00
3079-014-017	75.21
3079-015-001	156.36
3080-005-001	80.00
3080-005-002	95.03
3080-005-003	40.00
3080-005-009	47.67
3091-020-019	38.48
3091-020-020	37.60
3091-021-018	635.15
3091-024-006	310.14
3091-024-007	304.31
3150-015-003	77.29
3150-015-004	79.09
3150-015-006	155.08
3154-017-009	40.00
3376-022-004	20.00

BOLTHOUSE PROPERTIES, LLC**APNs with Acreage**

APN	SIZE IN ACRES
3376-022-005	20.00
3376-022-006	18.48
3376-022-016	36.74
3376-022-017	19.27
3376-022-018	17.17
3376-026-002	7.64
3376-026-003	9.33
3376-026-004	9.34
3376-026-005	9.35
3376-026-006	9.35
3376-026-007	9.36
3376-026-008	9.37
3376-026-009	7.97
3376-026-010	8.82
3376-026-011	8.92
3376-026-012	8.90
3376-026-013	8.63
3376-026-014	8.54
3376-026-015	8.80
3376-026-016	8.82
3376-026-017	8.72
3376-026-018	8.73
3376-026-019	8.83
3376-026-020	8.82
3376-026-021	8.55
3376-026-022	8.68
3376-026-023	8.95
3376-026-024	8.96
3376-026-025	8.86
3376-026-026	8.05
3376-026-027	9.45
3376-026-028	9.45
3376-026-029	8.26
3376-026-030	8.25
3376-026-031	9.43
3376-026-032	9.42
3376-026-033	7.72

BOLTHOUSE PROPERTIES, LLC**APNs with Acreage**

APN	SIZE IN ACRES
3378-002-003	35.69
3378-003-001	156.38
3378-004-008	79.09
3378-005-001	155.19
3378-005-002	78.49
3378-005-004	79.11
3378-005-005	79.11
3378-005-006	76.08
3378-023-005	29.43
3382-022-057	79.10
3382-023-027	116.84
3382-023-033	39.09
3382-023-034	38.20
3384-003-008	76.57
3384-003-010	19.55
3384-003-011	18.66
3384-004-004	81.68
3384-008-001	30.68
3384-008-020	39.09
3384-015-013	70.91
3384-016-013	40.00
3384-016-014	39.09
3384-017-001	79.09
3384-017-002	77.29
3384-017-003	76.40
3384-018-001	272.16
3384-018-002	39.00
3384-018-003	1.00
3384-018-004	153.38
3384-020-001	40.57
3386-013-010	40.00
3386-014-001	78.48
	6,553.67

BOLTHOUSE PROPERTIES, LLC

Titleholder 2000 to Present

APN	TITLEHOLDER	FROM	TO	TITLEHOLDER	FROM	TO	TITLEHOLDER	FROM	TO
3032-004-020	R.A. Rowan & Co	Jan 2000	Feb 2000	WM Bolthouse Farms, Inc.	Feb 2000	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present
3032-004-021	R.A. Rowan & Co	Jan 2000	Feb 2000	WM Bolthouse Farms, Inc.	Feb 2000	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present
3075-011-017	Samuel T Ajamian	Jan 2000	Aug 2002	WM Bolthouse Farms, Inc.	Aug 2002	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present
3075-014-001	Reliaw Enterprises, LLC	Jan 2000	May 2002	WM Bolthouse Farms, Inc.	May 2002	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present
3075-015-001	Hamf Holdings	Jan 2000	Dec 2002	WM Bolthouse Farms, Inc.	Dec 2002	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present
3075-015-002	Hamf Holdings	Jan 2000	Dec 2002	WM Bolthouse Farms, Inc.	Dec 2002	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present
3075-015-003	Hamf Holdings	Jan 2000	Dec 2002	WM Bolthouse Farms, Inc.	Dec 2002	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present
3075-015-004	Pearl E Arnold Trust	Jan 2000	Jun 2010	WM Bolthouse Farms, Inc.	Dec 2002	Mar 2005	Bolthouse Properties, LLC	Jun 2010	Present
3075-015-005	Hamf Holdings	Jan 2000	Dec 2002	WM Bolthouse Farms, Inc.	Dec 2002	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present
3075-015-006	Camello Group	Jan 2000	Jan 2004	WM Bolthouse Farms, Inc.	Jan 2004	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present
3075-015-007	Hamf Holdings	Jan 2000	Dec 2002	WM Bolthouse Farms, Inc.	Dec 2002	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present
3075-016-001	Reliaw Enterprises, LLC	Jan 2000	May 2002	WM Bolthouse Farms, Inc.	May 2002	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present
3075-016-002	Reliaw Enterprises, LLC	Jan 2000	May 2002	WM Bolthouse Farms, Inc.	May 2002	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present
3075-016-003	Reliaw Enterprises, LLC	Jan 2000	May 2002	WM Bolthouse Farms, Inc.	May 2002	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present
3075-016-004	Reliaw Enterprises, LLC	Jan 2000	May 2002	WM Bolthouse Farms, Inc.	May 2002	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present
3075-017-010	Reliaw Enterprises, LLC	Jan 2000	May 2002	WM Bolthouse Farms, Inc.	May 2002	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present
3075-017-011	Reliaw Enterprises, LLC	Jan 2000	May 2002	WM Bolthouse Farms, Inc.	May 2002	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present
3075-019-001	Reliaw Enterprises, LLC	Jan 2000	May 2002	WM Bolthouse Farms, Inc.	May 2002	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present
3075-019-002	Reliaw Enterprises, LLC	Jan 2000	May 2002	WM Bolthouse Farms, Inc.	May 2002	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present
3075-019-005	Reliaw Enterprises, LLC	Jan 2000	May 2002	WM Bolthouse Farms, Inc.	May 2002	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present
3075-019-006	Reliaw Enterprises, LLC	Jan 2000	May 2002	WM Bolthouse Farms, Inc.	May 2002	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present
3079-014-017	Estandia, N.V.	Jan 2000	Sep 2004	WM Bolthouse Farms, Inc.	Sep 2004	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Jul 2006
3079-015-001	Estandia, N.V.	Jan 2000	Sep 2004	WM Bolthouse Farms, Inc.	Sep 2004	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present
3080-005-001	WM Bolthouse Farms, Inc.	Jan 2000	Mar 2005	WM Bolthouse Farms, Inc.	Sep 2004	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present
3080-005-002	WM Bolthouse Farms, Inc.	Jan 2000	Mar 2005	WM Bolthouse Farms, Inc.	Sep 2004	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present
3080-005-003	Kenneth A Anderson	Jan 2000	Sep 2002	WM Bolthouse Farms, Inc.	Sep 2002	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present
3080-005-009	Kenneth A Anderson	Jan 2000	Sep 2002	WM Bolthouse Farms, Inc.	Sep 2002	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present
3091-020-019	Lutz E Issleib	Jan 2000	Feb 2000	WM Bolthouse Farms, Inc.	Feb 2000	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present
3091-020-020	Lutz E Issleib	Jan 2000	Feb 2000	WM Bolthouse Farms, Inc.	Feb 2000	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present
3091-021-018	Lutz E Issleib	Jan 2000	Feb 2000	WM Bolthouse Farms, Inc.	Feb 2000	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present
3091-024-006	Lutz E Issleib	Jan 2000	Feb 2000	WM Bolthouse Farms, Inc.	Feb 2000	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present
3091-024-007	Lutz E Issleib	Jan 2000	Feb 2000	WM Bolthouse Farms, Inc.	Feb 2000	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present
3150-015-003	WM Bolthouse Farms, Inc.	Jan 2000	Mar 2005	WM Bolthouse Farms, Inc.	Feb 2000	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present
3150-015-004	WM Bolthouse Farms, Inc.	Jan 2000	Mar 2005	WM Bolthouse Farms, Inc.	Feb 2000	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present
3150-015-006	WM Bolthouse Farms, Inc.	Jan 2000	Mar 2005	WM Bolthouse Farms, Inc.	Feb 2000	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present
3154-017-009	Estandia, N.V.	Jan 2000	Sep 2004	WM Bolthouse Farms, Inc.	Sep 2004	Mar 2005	Bolthouse Properties, LLC	Mar 2005	May 2005
3376-022-004	Juliana Ching	Jan 2000	Sep 2002	WM Bolthouse Farms, Inc.	Sep 2002	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present
3376-022-005	Juliana Ching	Jan 2000	Sep 2002	WM Bolthouse Farms, Inc.	Sep 2002	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present
3376-022-006	Juliana Ching	Jan 2000	Sep 2002	WM Bolthouse Farms, Inc.	Sep 2002	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present

LRI ** May 2005 Present

BOLTHOUSE PROPERTIES, LLC

Titleholder 2000 to Present

APN	TITLEHOLDER	FROM	TO	TITLEHOLDER	FROM	TO	TITLEHOLDER	FROM	TO
3378-005-002	WM Bolthouse Farms, Inc.	Jan 2000	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present			
3378-005-004	WM Bolthouse Farms, Inc.	Jan 2000	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present			
3378-005-005	WM Bolthouse Farms, Inc.	Jan 2000	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present			
3378-005-006	Mashiama Group	Jan 2000	Jul 2006	Bolthouse Properties, LLC	Jul 2006	Present			
3378-023-005	Estandia, N.V.	Jan 2000	Sep 2004	Bolthouse Properties, LLC	Mar 2005	Present	LRI **	Nov 2005	Present
3382-022-057	David P Bushnell Trust	Jan 2000	Jul 2004	Bolthouse Properties, LLC	Mar 2005	Nov 2005	LRI **	Sep 2007	Present
3382-023-027	David P Bushnell Trust	Jan 2000	Jul 2004	Bolthouse Properties, LLC	Mar 2005	Sep 2007	LRI **	May 2006	Present
3382-023-033	David P Bushnell Trust	Jan 2000	Jul 2004	Bolthouse Properties, LLC	Mar 2005	May 2006	LRI **	Jan 2008	Present
3382-023-034	David P Bushnell Trust	Jan 2000	Jul 2004	Bolthouse Properties, LLC	Mar 2005	Jan 2008	LRI **	Nov 2008	Present
3384-003-008	Estandia, N.V.	Jan 2000	Sep 2004	Bolthouse Properties, LLC	Mar 2005	Nov 2008	LRI **	Apr 2007	Present
3384-003-010	Estandia, N.V.	Jan 2000	Sep 2004	Bolthouse Properties, LLC	Mar 2005	Apr 2007	LRI **	Apr 2007	Present
3384-003-011	Estandia, N.V.	Jan 2000	Sep 2004	Bolthouse Properties, LLC	Mar 2005	Apr 2007	LRI **	Apr 2007	Present
3384-004-004	Avol Nimcut	Jan 2000	May 2001	Bolthouse Properties, LLC	Mar 2005	Present			
3384-008-001	Claire Lade Living Trust	Jan 2000	Jun 2001	Bolthouse Properties, LLC	Mar 2005	Present			
3384-008-020	Claire Lade Living Trust	Jan 2000	Jun 2001	Bolthouse Properties, LLC	Mar 2005	Present			
3384-015-013	Avol Nimcut	Jan 2000	May 2001	Bolthouse Properties, LLC	Mar 2005	Present			
3384-016-013	WM Bolthouse Farms, Inc.	Jan 2000	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present			
3384-016-014	WM Bolthouse Farms, Inc.	Jan 2000	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present			
3384-017-001	WM Bolthouse Farms, Inc.	Jan 2000	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present			
3384-017-002	WM Bolthouse Farms, Inc.	Jan 2000	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present			
3384-017-003	WM Bolthouse Farms, Inc.	Jan 2000	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present			
3384-018-001	WM Bolthouse Farms, Inc.	Jan 2000	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present			
3384-018-002	WM Bolthouse Farms, Inc.	Jan 2000	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present			
3384-018-003	WM Bolthouse Farms, Inc.	Jan 2000	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present			
3384-018-004	WM Bolthouse Farms, Inc.	Jan 2000	Mar 2005	Bolthouse Properties, LLC	Mar 2005	Present			
3384-020-001	Claire Lade Living Trust	Jan 2000	Jun 2001	Bolthouse Properties, LLC	Mar 2005	Present			
3386-013-010	Avol Nimcut	Jan 2000	May 2001	Bolthouse Properties, LLC	Mar 2005	Present			
3386-014-001	Avol Nimcut	Jan 2000	May 2001	Bolthouse Properties, LLC	Mar 2005	Present			

** Title to Water Well and water rights retained by
Bolthouse Properties, LLC

BOLTHOUSE PROPERTIES, LLC

Groundwater Production in Acre Feet of Water

Well No.	2011	2010	2009	2008	2007	2006	2005	2004	2003	2002	2001
1	165	784	669	665	684	484	1,116	995	891	1,010	875
2	36	234	-	95	381	18	223	397	381	452	420
3	3	644	833	828	633	29	878	997	1,002	1,015	-
4	128	227	158	1,372	1,097	661	869	907	888	745	-
5	636	756	899	673	874	552	396	781	528	664	525
6	74	623	487	761	587	628	663	764	733	1,097	622
7	-	-	375	145	-	-	317	481	447	482	350
8	85	78	865	812	509	472	411	469	545	1,005	-
9	-	84	830	781	655	569	695	651	601	1,301	404
10	67	667	352	648	806	432	610	864	985	870	742
11	208	253	2	415	249	-	274	264	287	324	-
12	451	1,365	764	1,294	1,133	708	324	988	836	460	561
13	90	151	324	405	492	3	312	369	372	521	350
14	-	91	19	582	319	282	338	491	501	353	-
15	36	-	-	249	270	-	294	379	579	309	729
16	293	1,077	414	977	1,100	822	656	1,105	1,132	181	915
17	-	-	-	-	31	-	289	616	281	458	605
18	508	229	567	503	307	351	345	852	1,014	759	598
19	-	-	-	777	544	858	571	1,186	647	763	630
20	432	623	693	551	-	318	172	184	220	404	350
21	331	65	691	51	-	270	389	442	542	453	775
22	-	1	398	1,172	295	138	900	326	1,118	756	627
23	-	7	246	396	301	85	458	599	467	447	322
24	32	358	96	442	24	305	163	321	468	438	375
25	68	890	756	1,366	657	627	513	1,137	435	934	689
26	144	212	277	256	244	25	137	205	281	531	315
27	228	233	420	441	544	341	480	627	452	430	367
28	241	254	281	166	112	235	493	607	558	569	337
29	386	380	263	673	426	465	591	781	636	615	359
30	150	179	416	322	537	360	411	400	550	404	427
31	114	162	144	301	382	173	293	225	354	272	140
32	332	323	321	938	1,048	561	522	676	587	595	340
33	-	400	269	667	377	138	124	404	203	180	372
34	-	641	471	587							
35	-	182	94	215	54	-	236	536	174	474	
36	238	823	1,175	1,305	712	57					
37	78	249	288								
38	588	672	321	509	646	488					
39	535	355	328	232	176						
40	31	464	-	1,187	573						
41	386	129	733	845	810	719					
42	185	-	539	55	46	5					
43	202	156	651	1,629	750	157	635	924	1,005		
44	121	693	853	995	738	837	1,043	1,632	883		
45	401	29	844	401	817	934	444	1,159	975		
46	726	361	770	1,430	824	851					
47	44	511	326	408	346	209	254	511	307	304	
48	63	310	237	472	455	265	292	154	413	256	
49	753	890	1,614	1,277	1,326	650					
50	693	487	1,508	1,295	1,587	513					
51	396	414	365	256	734	396	638	295	1,218		
52	366	25	189	485	600	246	514	73	678		
Total	11,044	18,740	24,134	33,307	26,812	17,237	19,283	25,774	25,174	20,831	14,121

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*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 January 15, 2013, I served the foregoing document(s) entitled:

**BOLTHOUSE PROPERTIES, LLC'S AND WM. BOLTHOUSE FARMS, INC.'S
FURTHER RESPONSE TO DISCOVERY ORDER FOR PHASE 4 TRIAL**

— 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 January 15, 2013, 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