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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**

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

8 **SUPERIOR COURT OF CALIFORNIA**

9 **COUNTY OF SANTA CLARA**

10 **COORDINATION PROCEEDING**
11 **SPECIAL TITLE (Rule 1550(b))**

) **Judicial Council Coordination Proceeding No.**
) **4408**

12 **ANTELOPE VALLEY GROUNDWATER**
13 **CASES**

) **CASE NO. 1-05-CV-049053**

13 **INCLUDED ACTIONS:**

14 **LOS ANGELES COUNTY**
15 **WATERWORKS DISTRICT NO. 40 v.**
16 **DIAMOND FARMING COMPANY, et al.,**
17 **Los Angeles Superior Court Case No.**
18 **BC325201**

) **NOTICE TO PARTIES TO APPEAR**
) **AND PRODUCE DOCUMENTS AT**
) **TRIAL**

) **[C.C.P. §1987(b), (c)]**

17 **LOS ANGELES COUNTY**
18 **WATERWORKS DISTRICT NO. 40 v.**
19 **DIAMOND FARMING COMPANY, et al.,**
20 **Kern County Superior Court Case No. S-**
21 **1500-CV-254348**

20 **DIAMOND FARMING COMPANY, and**
21 **W.M. BOLTHOUSE FARMS, INC., v.**
22 **CITY OF LANCASTER, et al.,**
23 **Riverside Superior Court**
24 **Case No. RIC 344436 [c/w case no. RIC**
25 **344668 and 353840]**

) **Trial Date: May 28, 2013**
) **Action Filed: October 26, 2005**

24 **AND RELATED ACTIONS**

26 **///**

27 **///**

1 TO ALL PARTIES LISTED BELOW and their attorneys of record:

2 **PARTIES**

3 QUARTZ HILL WATER DISTRICT, Chad Reed; UNITED STATES OF AMERICA, Gerald
4 T. Boetsch, Jr., Jared Scott; CALIFORNIA WATER SERVICE COMPANY, John R. Forth;
5 PHELAN PINION HILLS COMMUNITY SERVICES DISTRICT, Don Bartz; THE CITY OF
6 LOS ANGELES, BY AND THROUGH ITS DEPARTMENT OF AIRPORTS, LOS
7 ANGELES WORLD AIRPORTS ("LAWA"); ANTELOPE VALLEY-EAST KERN WATER
8 AGENCY ("AVEK"), Dan Flory, Hong lie Qiu, Dwayne Chisam, Michael Flood, Burce
9 Burrows; AV UNITED MUTUAL, St. Andrew's Abbey, Service Rock, Sheep Creek, Golden
10 Sands, Adams Bennett, White Fence Farms Mutual Water Company, West Side Park Mutual
11 Water Company, Tierra Bonita Mutual Water Company, Sunnyside Farms Mutual Water
12 Company, Sundale Mutual Water Company, Shadow Acres Mutual Water Company, Landale
13 Mutual Water Company, Land Projects Mutual Water Company, Evergreen Mutual Water
14 Company, El Dorado Mutual Water Company, Colorado Mutual Water Company, Bleich Flat
15 Mutual Water Company, Baxter Mutual Water Company, Averydale Mutual Water Company,
16 Aqua J. Mutual Water Compaany, Antelope Park Mutual Water Company (collectively "AV
17 UNITED MUTUALS"); COUNTY SANITATION DISTRICTS OF LOS ANGELES
18 COUNTY DISTRICTS NO. 14 AND 20 ("LA County Sanitation"), Ray Trambly; BORON
19 COMMUNITY SERVICES DISTRICT ("BCSD"), Peter A. Lopez; STATE OF
20 CALIFORNIA, Jerome Marcotte, Daniel Robbins, David Gerard; LITTLEROCK CREEK
21 IRRIGATION DISTRICT ("LCID"), Brad Bones; PALM RANCH IRRIGATION DISTRICT,
22 Peter Tuculet; ROSAMOND COMMUNITY SERVICES DISTRICT ("RCSD"), Steve A.
23 Perez; CITY OF LANCASTER, Carlyle S. Workman; PALMDALE WATER DISTRICT,
24 Dennis Lamoreaux; BLUM TRUST, Sheldon Blum; ROSAMOND RANCH; ANTELOPE
25 VALLEY WATER STORAGE, LLC; LANDINV., INC.; ANTELOPE VALLEY JOINT
26 UNION HIGH SCHOOL DISTRICT; HOLLIDAY ROCK CO., INC., John Holliday, Peter
27 Pouwels, Dean Browning; LITTLEROCK AGGREGATE CO., INC., Robert J. Pluss;
28 GEORGE AND CHARLENE LANE FAMILY TRUST AND THE FRANK AND YVONNE

1 LANE 1993 FAMILY TRUST ("LANE FAMILY TRUST"), Blake McCullough-Sanden;
2 MONTE VISTA BUILDING SITES INC.; THE GEORGE AND CHARLENE LANE
3 FAMILY TRUST ("Monte Vista"), George Lane; AV SOLAR RANCH 1, LLC, and Daniel
4 Wusinich.

5 PLEASE TAKE NOTICE that Wm. Bolthouse Farms, Inc. and Bolthouse Properties,
6 LLC, pursuant to *Code of Civil Procedure Section 1987(b)*, require the attendance of the
7 PARTIES listed above with regard to the issues and documents identified on Exhibit "A"
8 attached hereto and herein incorporated by reference. This notice also requests appearance by
9 the officer, director, or managing agent most knowledgeable regarding the issues and
10 documents identified on Exhibit "A." The trial at which appearance is requested is scheduled
11 to begin on May 28, 2013. However, the trial court has not decided on the order of witnesses.
12 Request is made that the witnesses be available for the trial which begins on May 28, 2013
13 subject to setting the date of appearance based upon further clarifying court orders regarding
14 the order of trial. Arrangements may be made with the noticing entity attorney to be on call.
15 The place for attendance at trial is the Los Angeles County Superior Court located at 111 N.
16 Hill Street, Los Angeles, CA 90012 or such other location pursuant to court order.

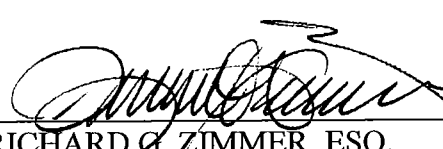
17 PLEASE TAKE FURTHER NOTICE that pursuant to *Code of Civil Procedure Section*
18 *1987(c)*, Wm. Bolthouse Farms, Inc. and Bolthouse Properties, LLC request that the Person
19 Most Knowledgeable, the officer, director or managing agent most knowledgeable and the
20 PARTIES identified above, produce the documents identified on Exhibit "A."

21 DATED: May 10, 2013

Respectfully submitted.

22 CLIFFORD & BROWN

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24
25 By:


26 RICHARD G. ZIMMER, ESQ.
27 Attorneys for
28 BOLTHOUSE PROPERTIES, LLC and
WM. BOLTHOUSE FARMS, INC.

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1 PROOF OF SERVICE (C.C.P. §1013a, 2015.5)
2 Antelope Valley Groundwater Cases
3 Judicial Counsel Coordination Proceeding No. 4408
4 Santa Clara County Superior Court Case No. 1-05-CV-049053

5 I am employed in the County of Kern, State of California. I am over the age of 18 and
6 not a party to the within action; my business address is 1430 Truxtun Avenue, Suite 900,
7 Bakersfield, CA 93301.

8 On May 10, 2013, I served the foregoing document(s) entitled:


9 **NOTICE TO PARTIES TO APPEAR AND PRODUCE DOCUMENTS AT TRIAL**

10 by uploading the document listed above to the Santa Clara Superior Court website in regard to
11 the Antelope Valley Groundwater Matter. All parties listed on the Santa Clara Superior Court
12 in regard to the Antelope Valley Groundwater Matter are hereby incorporated within by this
13 reference.

14 ☒ BY SANTA CLARA SUPERIOR COURT E-FILEING IN COMPLEX LITIGATION
15 PURSUANT TO CLARIFICATION ORDER DATED OCTOBER 27, 2005.

16 Executed on May 10, 2013, at Bakersfield, California.

17 ☒ (State) I declare under penalty of perjury under the laws of the State of
18 California that the above is true and correct.

19 
20 VICKI STREET
21 2455-2
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