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2455-2

Via Facsimile, Electronic Posting & U.S. Mail

Jeffrey Dunn, Esq.
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5 Park Plaza, Suite 1500
Irvine, CA 92614

Re: Antelope Valley Groundwater Litigation
Santa Clara County Superior Court Case No. 1-05-CV-049053
Judicial Council Coordination Proceeding No. 4408
Meet and Confer


Dear Mr. Dunn:

I am in receipt of your Objections to written discovery propounded by Bolthouse to your client. In our review, the Objections are without merit. This correspondence is to request that you meet and confer with the undersigned in an informal attempt to resolve the issue. We are willing to meet with you in person for the purposes of resolving and discussing the issue as required.

In the absence of resolution of this dispute, it is likely that a Motion to Compel will follow. I request that you to provide me with dates and times when you would be available to meet and confer. If you would rather meet and confer by telephone, that would be acceptable as well.

If I have not received your written response to this correspondence **by 5:00 p.m. on Tuesday, September 25, 2007**, I will assume you have declined to meet and confer, and will proceed as permitted by law. I await your response.

Very truly yours,


RICHARD G. ZIMMER

RGZ/nm
BL/BOLTHOUSE/ANTELOPE/SANTA CLARA/DUNN-1