

**CLIFFORD & BROWN**

A PROFESSIONAL CORPORATION

**ATTORNEYS AT LAW**

**BANK OF AMERICA BUILDING**

**1430 TRUXTUN AVENUE, SUITE 900  
BAKERSFIELD, CALIFORNIA 93301-5230**

STEPHEN T. CLIFFORD  
JAMES E. BROWN  
ROBERT D. HARDING  
ARNOLD ANCHORDOQUY  
PATRICK J. OSBORN  
MICHAEL L. O'DELL  
GROVER H. WALDON  
JOHN R. SZEWCZYK  
STEPHEN H. BOYLE†  
JAMES B. WIENS  
RICHARD G. ZIMMER  
CHARLES D. MELTON  
T. MARK SMITH

WINIFRED THOMSON HOSS  
JEREMY J. SCHROEDER  
SHELLY S. MAURER  
DANIEL T. CLIFFORD  
CHRISTOPHER J. HAGAN  
BRENDA A. ENDERLE  
VICTORIA M. TRICHELL\*  
RYAN A. LEGGIO  
NICHOLAS J. STREET  
TIMOTHY M. OSBORN

OF COUNSEL  
ANTHONY L. LEGGIO

† LLM TAXATION  
\* ALSO LICENSED IN VIRGINIA

KATHY R. SMITH  
OFFICE ADMINISTRATOR

TELEPHONE NO.  
**(661) 322-6023**

FACSIMILE NO.  
**(661) 322-3508**

E-MAIL  
cblaw@clifford-brownlaw.com  
WEBSITE  
www.clifford-brownlaw.com

September 19, 2007

2455-2

**Via Facsimile, Electronic Posting & U.S. Mail**

Jeffrey Dunn, Esq.  
Best, Best & Krieger  
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**

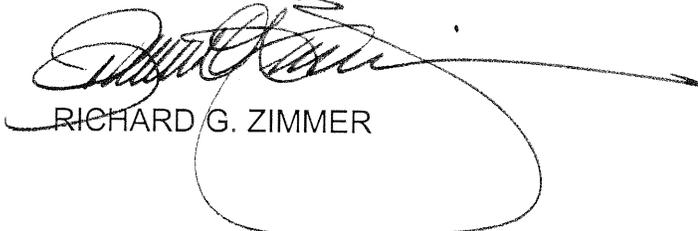
Dear Mr. Dunn:

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