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September 28, 2007

2455-2

Via Facsimile, E-filing and Mail

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Re: Antelope Valley Groundwater Litigation

Santa Clara County Superior Court Case No. 1-05-CV-049053

Judicial Council Coordination Proceeding No. 4408

Dear Counsel:

A review of the above-captioned file indicates that your clients have failed to serve responses to Bolthouse Properties, LLC's, which was served on your office on August 15, 2007.

Outstanding discovery responses includes the following:

- (1) Form Interrogatories, Set One;
- Special Interrogatories, Set One; (2)
- Request for Admissions, Set One; (3)
- (4) Request for Production of Documents.

Re: Antelope Valley Groundwater Litigation September 28, 2007 Page 2

Please provide verified responses, without objections, within ten (5) days of the date of this letter to avoid the necessity of our scheduling a meet and confer conference with the Court, and the eventual necessity of a Motion to Compel.

If you have any questions, please do not hesitate to contact the undersigned.

Very truly yours,

Richard G. Zimmer

RGZ/nm

BL/ANTELOPE VALLEY/SANTA MARIA/PLTFS COUNSEL-03