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and WM. BOLTHOUSE FARMS, INC.
7

8 SUPERIOR COURT OF CALIFORNIA
9 COUNTY OF LOS ANGELES – CENTRAL DISTRICT

10 * * *

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

JUDICIAL COUNCIL COORDINATION PROCEEDING
No. 4408

12 ANTELOPE VALLEY GROUNDWATER
13 CASES

CASE NO. 1-05-CV-049053
Action Filed: October 26, 2005

14 INCLUDED ACTIONS:

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

**DECLARATION OF RICHARD G.
ZIMMER IN SUPPORT OF BOLTHOUSE
PROPERTIES, LLC' S OPPOSITION TO
MOTION IN LIMINE AND REQUESTS
FOR JUDICIAL NOTICE**

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

**Trial Date: February 10, 2014
Time: 9:00 a.m.
Dept: One**

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

24 AND RELATED ACTIONS.
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1 **DECLARATION OF RICHARD G. ZIMMER**

2 I, RICHARD G. ZIMMER, hereby declare as follows:

3 1. I am an attorney duly licensed to practice law in the State of California, and am
4 a partner in the law firm of Clifford & Brown, A Professional Corporation, attorneys for
5 Bolthouse Properties, LLC and Wm Bolthouse Farms, Inc. in the above-entitled matter. I make
6 this declaration of my own personal knowledge, except for those matters stated on information
7 and belief, and as to those matters, I believe them to be true.

8 2. Attached hereto as Exhibit "A" is a true and correct copy of excerpts from the
9 transcript of proceedings in this matter on March 8, 2010.

10 3. Attached hereto as Exhibit "B" is a true and correct copy of the Court's Order
11 After Case Management Conference on March 22, 2010.

12 4. Attached hereto as Exhibit "C" is a true and correct copy of the Public Water
13 Suppliers' Expert Designation for Phase III Trial and Expert Declaration.

14 5. Attached hereto as Exhibit "D" is a true and correct copy of excerpts from the
15 transcript of proceedings in this matter on February 14, 2011.

16 6. Attached hereto as Exhibit "E" is a true and correct copy of the San District's
17 objections to the deposition of Mr. Leffler.

18 7. Attached hereto as Exhibit "F" is a true and correct copy of the San District's
19 second set of objections to the deposition of Mr. Leffler.

20 8. Attached hereto as Exhibit "G" is a true and correct copy of the Los Angeles
21 County objections to the deposition of Mr. Leffler.

22 9. Attached hereto as Exhibit "H" is a true and correct copy of Bolthouse
23 Properties' Proposal regarding Content of Statement of Decision, dated May 24, 2011.

24 10. Attached hereto as Exhibit "I" is a true and correct copy of the Proposed
25 Statement of Decision regarding the Phase Three Trial, served by the purveyors on June 6,
26 2011.

27 11. Attached hereto as Exhibit "J" is a true and correct copy of Bolthouse
28 Properties' Objection to the Proposed Statement of Decision, dated June 21, 2011.

1 12. Attached hereto as Exhibit "K" is a true and correct copy of excerpts from the
2 transcript of proceedings in this matter on July 11, 2011.

3 13. Attached hereto as Exhibit "L" is a true and correct copy of the final Statement
4 of Decision regarding the Phase Three Trial, dated July 13, 2011.

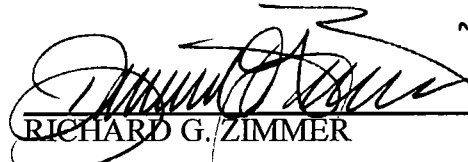
5 14. Attached hereto as Exhibit "M" is a true and correct copy of the Court's
6 December 12, 2012 Case Management Order regarding Phase IV trial.

7 15. Attached hereto as Exhibit "N" is a true and correct copy of excerpts from the
8 transcript of proceedings in this matter on February 1, 2011.

9 16. Attached hereto as Exhibit "O" is a true and correct copy of excerpts from the
10 transcript of proceedings in this matter on February 17, 2011.

11 I declare under penalty of perjury under the laws of the State of California that the
12 foregoing is true and correct.

13 Executed this 29th day of January, 2014 at Bakersfield, California.

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16 RICHARD G. ZIMMER
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PROOF OF SERVICE (C.C.P. §1013a, 2015.5)
Antelope Valley Groundwater Cases
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, Suite 900, Bakersfield, CA 93301.

On January 30, 2014, I served the foregoing document(s) entitled:

**DECLARATION OF RICHARD G. ZIMMER IN SUPPORT OF BOLTHOUSE
PROPERTIES, LLC'S OPPOSITION TO MOTION IN LIMINE AND REQUESTS
FOR JUDICIAL NOTICE**


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

X BY SANTA CLARA SUPERIOR COURT E-FILING IN COMPLEX
LITIGATION PURSUANT TO CLARIFICATION ORDER DATED
OCTOBER 27, 2005.

Executed on January 30, 2014, 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.


SUE HAYS
{2455-2}