

EXHIBIT “E”

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EXEMPT FROM FILING FEES
 UNDER GOVERNMENT CODE
 SECTION 6103

Attorneys for Cross-Defendants County Sanitation Districts Nos. 14 and 20 of Los Angeles County

SUPERIOR COURT OF THE STATE OF CALIFORNIA
 COUNTY OF LOS ANGELES – CENTRAL DISTRICT

**ANTELOPE VALLEY
 GROUNDWATER CASES**

Included Actions:

Los Angeles County Waterworks District
 No. 40 v. Diamond Farming Co.
 Superior Court of California, County of
 Los Angeles, Case No. BC 325 201

Los Angeles County Waterworks District
 No. 40 v. Diamond Farming Co.
 Superior Court of California, County of
 Kern, Case No. S-1500-CV-254-348

Wm. Bolthouse Farms, Inc. v. City of
 Lancaster, Diamond Farming Co. v. City
 of Lancaster, Diamond Farming Co. v.
 Palmdale Water Dist., Superior Court of
 California, County of Riverside,
 consolidated actions, Case Nos. RIC 353
 840, RIC 344 436, RIC 344 668

Judicial Council Coordination No. 4408

CLASS ACTION

Santa Clara Case No.: 1-05-CV-049053

ASSIGNED FOR ALL PURPOSES TO:
 Judge: Honorable Jack Komar

OBJECTIONS TO BOLTHOUSE RE-NOTICE
 OF DEPOSITION OF EXPERT WITNESS
 PETER LEFFLER AND REQUEST FOR
 PRODUCTION OF DOCUMENTS

Date: October 22, 2010
 Time: 10:00 a.m.
 Place: Ramada Inn - Burbank
 2900 N. San Fernando Blvd.
 Burbank, California 91504

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that COUNTY SANITATION DISTRICTS NOS. 14 AND 20
 OF LOS ANGELES COUNTY ("Cross-Defendants") object to Bolthouse Properties, LLC and

1 Wm. Bolthouse Farms Re-Notice of Deposition of Expert Witness Peter Leffler and Request for
2 Production of Documents ("Deposition Notice"), as follows:

3 Cross-Defendants object to the Deposition Notice on the grounds that it calls for
4 information outside the scope of the expert designation. Mr. Leffler has been designated by the
5 Public Water Suppliers for the limited purpose of providing expert testimony and rebuttal
6 testimony regarding characteristics of bedrock surrounding the Antelope Valley and potential
7 flows of groundwater through those materials into the Basin. Nothing in this objection, however,
8 limits the breadth or scope of future designation of this expert by Cross-Defendants, should this
9 designation be made.

10 SPECIFIC OBJECTIONS

11 1. Cross-Defendants object to this document request to the extent it is outside the scope of
12 the expert designation and calls for information protected by the attorney work product doctrine.

13 2. Cross-Defendants object to this document request to the extent it is outside the scope of
14 the expert designation and calls for information protected by the attorney work product doctrine.

15 3. Cross-Defendants object to this document request to the extent it is outside the scope of
16 the expert designation and calls for information protected by the attorney work product doctrine.

17 4. Cross-Defendants object to this document request to the extent it is outside the scope of
18 the expert designation and calls for information protected by the attorney work product doctrine.

19 5. Cross-Defendants object to this document request to the extent it is outside the scope of
20 the expert designation and calls for information protected by the attorney work product doctrine.

21 6. Cross-Defendants object to this document request to the extent it is outside the scope of
22 the expert designation and calls for information protected by the attorney work product doctrine.

23 7. Cross-Defendants object to this document request to the extent it is outside the scope of
24 the expert designation and calls for information protected by the attorney work product doctrine.

25 8. Cross-Defendants object to this document request to the extent it is outside the scope of
26 the expert designation and calls for information protected by the attorney work product doctrine.

27 9. Cross-Defendants object to this document request to the extent it is outside the scope of
28 the expert designation and calls for information protected by the attorney work product doctrine.

1 11. Cross-Defendants object to this document request to the extent it is outside the scope of
2 the expert designation and calls for information protected by the attorney work product doctrine.

3 12. Cross-Defendants object to this document request to the extent it is outside the scope of
4 the expert designation and calls for information protected by the attorney work product doctrine.

5 13. Cross-Defendants object to this document request to the extent it is outside the scope of
6 the expert designation and calls for information protected by the attorney work product doctrine.

7 15. Cross-Defendants object to this document request to the extent it is outside the scope of
8 the expert designation and calls for information protected by the attorney work product doctrine.


9 17. Cross-Defendants object to this document request to the extent it is outside the scope of
10 the expert designation and calls for information protected by the attorney work product doctrine.

11 18. Cross-Defendants object to this document request to the extent it is outside the scope of
12 the expert designation and calls for information protected by the attorney work product doctrine.

13 19. Cross-Defendants object to this document request to the extent it is outside the scope of
14 the expert designation and calls for information protected by the attorney work product doctrine.

15
16 Dated: October 11, 2010

ELLISON, SCHNEIDER & HARRIS L.L.P.

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19 By: 
20 CHRISTOPHER M. SANDERS
21 Attorneys for Cross-Defendants
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[illegible]

I am employed in the County of Sacramento, State of California. I am over the age of eighteen years and am not a party to the within action. My business address is ELLISON, SCHNEIDER & HARRIS, L.L.P.; 2600 Capitol Avenue, Suite 400; Sacramento, California 95816; telephone (916) 447-2166.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on October 11, 2010, at Sacramento, California.

Patty Sl
Patty Slomski