

EXHIBIT “G”

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 WATERWORKS DISTRICT NO. 40
 7
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 13 COUNTY WATERWORKS DISTRICT NO. 40

**EXEMPT FROM FILING FEES
 UNDER GOVERNMENT CODE
 SECTION 6103**

14
 15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
 16 **COUNTY OF LOS ANGELES – CENTRAL DISTRICT**
 17

18 **ANTELOPE VALLEY**
GROUNDWATER CASES
 19
 20 Included Actions:
 Los Angeles County Waterworks District
 No. 40 v. Diamond Farming Co., Superior
 21 Court of California, County of Los
 Angeles, Case No. BC 325201;
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 Los Angeles County Waterworks District
 23 No. 40 v. Diamond Farming Co., Superior
 Court of California, County of Kern, Case
 24 No. S-1500-CV-254-348;
 25 Wm. Bolthouse Farms, Inc. v. City of
 Lancaster, Diamond Farming Co. v. City of
 26 Lancaster, Diamond Farming Co. v.
 Palmdale Water Dist., Superior Court of
 27 California, County of Riverside, Case Nos.
 RIC 353 840, RIC 344 436, RIC 344 668
 28

Judicial Council Coordination No. 4408

CLASS ACTION

Santa Clara Case No. 1-05-CV-049053
 Assigned to The Honorable Jack Komar

**OBJECTIONS TO BOLTHOUSE'S NOTICE
 OF DEPOSITION OF EXPERT PETER
 LEFFLER**

Date: August 3, 2010
 Time: 9:00 a.m.
 Place: Lagerlof, Senecal, Gosney & Kruse
 301 North Lake Avenue, 10th Floor
 Pasadena, California 91101

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

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3 PLEASE TAKE NOTICE that LOS ANGELES COUNTY WATERWORKS DISTRICT
4 NO. 40 and ROSAMOND COMMUNITY SERVICES DISTRICT ("Cross-Complainants")
5 object to BOLTHOUSE PROPERTIES, LLC AND WM. BOLTHOUSE FARMS, INC.'S
6 ("Bolthouse's") Notice Of Taking And Videotaping Deposition of Los Angeles County's Expert,
7 Peter Leffler ("Deposition Notice"), as follows:

8 Cross-Complainants object to the Deposition Notice on the grounds that the Deposition
9 Notice is improper, as it requests the appearance of expert witness Peter Leffler on August 3,
10 2010 and the Antelope Ground Water Agreement Association requests Mr. Leffler be available
11 on August 17, 18 and 19th. Expert witness Peter Leffler cannot appear for depositions twice, and
12 therefore Cross-Complainants object to Bolthouse's improper Deposition Notice.

13 Cross-Complainants further object to the Deposition Notice on the grounds that it calls for
14 information beyond the scope of the expert designation. Mr. Leffler has been designated by the
15 Public Water Suppliers for a limited purpose of providing expert testimony and rebuttal testimony
16 regarding characteristics of bedrock surrounding the Antelope Valley and potential flows of
17 groundwater through those materials into the Basin.

18 SPECIFIC OBJECTIONS

19 1. Cross-Complainants object to document request number 1 to the extent it is
20 beyond the scope of the expert designation and calls for information protected by the attorney
21 work product doctrine.

22 2. Cross-Complainants object to document request number 2 to the extent it is
23 beyond the scope of the expert designation and calls for information protected by the attorney
24 work product doctrine.

25 3. Cross-Complainants object to document request number 3 to the extent it is
26 beyond the scope of the expert designation and calls for information protected by the attorney
27 work product doctrine.

28 4. Cross-Complainants object to document request number 4 to the extent it is

1 beyond the scope of the expert designation and calls for information protected by the attorney
2 work product doctrine.

3 5. Cross-Complainants object to document request number 5 to the extent it is
4 beyond the scope of the expert designation and calls for information protected by the attorney
5 work product doctrine.

6 6. Cross-Complainants object to document request number 6 to the extent it is
7 beyond the scope of the expert designation and calls for information protected by the attorney
8 work product doctrine.

9 7. Cross-Complainants object to document request number 7 to the extent it is
10 beyond the scope of the expert designation and calls for information protected by the attorney
11 work product doctrine.

12 8. Cross-Complainants object to document request number 8 to the extent it is
13 beyond the scope of the expert designation and calls for information protected by the attorney
14 work product doctrine.

15 9. Cross-Complainants object to document request number 9 to the extent it is
16 beyond the scope of the expert designation and calls for information protected by the attorney
17 work product doctrine.

18 10. Cross-Complainants object to document request number 11 to the extent it is
19 beyond the scope of the expert designation and calls for information protected by the attorney
20 work product doctrine.

21 11. Cross-Complainants object to document request number 12 to the extent it is
22 beyond the scope of the expert designation and calls for information protected by the attorney
23 work product doctrine.

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1 12. Cross-Complainants object to document request number 13 to the extent it is
2 beyond the scope of the expert designation and calls for information protected by the attorney
3 work product doctrine.

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5 Dated: July 26, 2010

BEST BEST & KRIEGER LLP

6
7 By


ERIC J. GARNER
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Attorneys for Cross-Complainants
ROSAMOND COMMUNITY SERVICES
DISTRICT and LOS ANGELES
COUNTY WATERWORKS DISTRICT
NO. 40

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PROOF OF SERVICE

I, Kerry V. Keefe, declare:

I am a resident of the State of California and over the age of eighteen years, and not a party to the within action; my business address is Best Best & Krieger LLP, 5 Park Plaza, Suite 1500, Irvine, California 92614. On July 26, 2010, I served the within document(s):

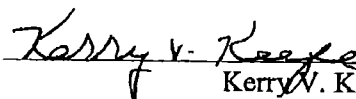
OBJECTIONS TO BOLTHOUSE'S NOTICE OF DEPOSITION OF EXPERT PETER LEFFLER

- ☒ by posting the document(s) listed above to the Santa Clara County Superior Court website in regard to the Antelope Valley Groundwater matter.
- ☐ by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Irvine, California addressed as set forth below.
- ☐ by causing personal delivery by ASAP Corporate Services of the document(s) listed above to the person(s) at the address(es) set forth below.
- ☐ by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.
- ☐ I caused such envelope to be delivered via overnight delivery addressed as indicated on the attached service list. Such envelope was deposited for delivery by Federal Express following the firm's ordinary business practices.

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

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

Executed on July 26, 2010, at Irvine, California.


Kerry V. Keefe