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Attorneys for BOLTHOUSE PROPERTIES, LLC
and WM. BOLTHOUSE FARMS, INC.

SUPERIOR COURT OF CALIFORNIA

COUNTY OF LOS ANGELES

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COORDINATION PROCEEDING
SPECIAL TITLE (Rule 1550(b))

JUDICIAL COUNCIL COORDINATION PROCEEDING
No. 4408

ANTELOPE VALLEY GROUNDWATER
CASES

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

INCLUDED ACTIONS:

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

**DECLARATION OF RICHARD G.
ZIMMER IN SUPPORT OF BOLTHOUSE
PROPERTIES, LLC AND WM.
BOLTHOUSE FARMS, INC. OPPOSITION
TO BLUM TRUST'S MOTION FOR
SUMMARY JUDGMENT / SUMMARY
ADJUDICATION OF ISSUES**

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

Date: December 22, 2014
Time: 10:00 a.m.
Dept: TBD
Judge: Hon. Jack Komar

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

AND RELATED ACTIONS.

I, Richard G. Zimmer, hereby declare as follows:

1. I am an attorney duly licensed to practice law in the state of California, and am a partner
of Clifford & Brown, attorneys of record for BOLTHOUSE PROPERTIES, LLC and WM.

1 BOLTHOUSE FARMS, INC. I am the attorney principally responsible for the handling of this matter
2 on behalf of the BOLTHOUSE entities, and am thoroughly familiar with it. The facts set forth herein are
3 of my own personal knowledge, and if called to testify as a witness, I could and would competently
4 testify to the matters set forth herein.

5 2. Attached hereto as Exhibit "A" is a true and correct copy of the Declaration of Dan
6 Wilke Regarding Water Use on Blum Property.

7 3. Attached hereto as Exhibit "B" is a true and correct copy of the Settlement Agreement
8 between BLUM TRUST and BOLTHOUSE

9 I declare under penalty of perjury under the laws of the State of California that the foregoing is
10 true and correct. Executed this 17 day of December, 2014, at Bakersfield, California.

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13 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 December 8, 2014, I served the foregoing document(s) entitled:

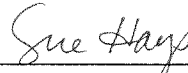
**DECLARATION OF RICHARD G. ZIMMER IN SUPPORT OF BOLTHOUSE
PROPERTIES, LLC AND WM. BOLTHOUSE FARMS, INC. OPPOSITION TO
BLUM TRUST'S MOTION FOR SUMMARY JUDGMENT/SUMMARY
ADJUDICATION OF ISSUES**

by posting 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-FILED IN COMPLEX
LITIGATION PURSUANT TO CLARIFICATION ORDER DATED
OCTOBER 27, 2005.

Executed on December 8, 2014, at Bakersfield, California.

<u>X</u>	(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}