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| 6 7 | Attorneys for BOLTHOUSE PROPERTIES, LLC and WM. BOLTHOUSE FARMS, INC. | |
| 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 | CASE NO. 1-05-CV-049053 |
| 13 | CASES | Action Filed: October 26, 2005 |
| 14 | INCLUDED ACTIONS: | NOTICE RE CLARIFICATION OF |
| 15 | LOS ANGELES COUNTY WATERWORKS DISTRICT NO. 40 v. DIAMOND FARMING | BRIEFING RE FEDERAL RESERVE RIGHT |
| 16 | COMPANY, et al., Los Angeles Superior Court Case No. BC325201 | |
| 17 | LOS ANGELES COUNTY WATERWORKS | |
| 18 | DISTRICT NO. 40 v. DIAMOND FARMING COMPANY, et al., | |
| 19 | Kern County Superior Court Case No. S-1500- CV-254348 | |
| 20 | | |
| 21 | DIAMOND FARMING COMPANY, and W.M. BOLTHOUSE FARMS, INC., v. CITY OF | |
| 22 | LANCASTER, et al., Riverside Superior Court Case No. RIC 344436 | |
| 23 | [c/w case no. RIC 344668 and 353840] | |
| 24 | AND RELATED ACTIONS. | |
| 25 | | |
| 26 | TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD: | |
| 27 | The status of briefing on the federal reserve right has generated some confusion. Although | |
| 28 | the proceedings were not reported, the Court at its May 15, 2015 hearing entertained argument from | |
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| 1 | | |

NOTICE RE CLARIFICATION OF BRIEFING RE FEDERAL RESERVE RIGHT

counsel for the Willis Class about the admissibility of evidence in light of the Willis Class having chosen to not be present in the courtroom for that phase of trial. Subsequent to the hearing, the Court issued a minute order with a briefing schedule, but Willis Class counsel also filed a notice withdrawing its opposition on the evidentiary question and stating "There is no need for further briefing on this issue." (Doc. # 9927). The stipulating parties understood that the briefing proposal only applied to the Willis Class issue, as forcing the parties to continue to litigate when they have reached a proposed settlement would be an enormous waste of time and judicial resources. BOLTHOUSE PROPERTIES, LLC and WM. BOLTHOUSE FARMS, INC. hereby request that the Court hold in abeyance any further briefing or decisions on the Federal Reserve Right unless and until the proposed judgment and physical solution is ruled upon by the Court. If that settlement is not approved, then the stipulating parties request the opportunity to brief and be heard on the resolution of the Federal Reserve Right.

DATED: June 22, 2015

CLIFFORD & BROWN

By

RICHARD G. ZIMMER, ESQ.

T. MARK SMITH, ESQ.

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

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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

STATE OF CALIFORNIA, COUNTY OF KERN

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, my email address is shays@clifford-brownlaw.com.

On June 22, 2015, I served the foregoing document(s) entitled:

NOTICE RE CLARIFICATION OF BRIEFING RE FEDERAL RESERVE RIGHT

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-FILING IN COMPLEX LITIGATION PURSUANT TO CLARIFICATION ORDER DATED OCTOBER 27, 2005.

Executed on June 22, 2015, 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}