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

SUPERIOR COURT OF CALIFORNIA

COUNTY OF SANTA CLARA

* * *

COORDINATION PROCEEDING)	Judicial Council Coordination
SPECIAL TITLE (Rule 1550(b)))	Proceeding No. 4408
)	
ANTELOPE VALLEY GROUNDWATER)	CASE NO. 1-05-CV-049053
CASES)	
)	
INCLUDED ACTIONS:)	
)	
LOS ANGELES COUNTY WATERWORKS)	WM. BOLTHOUSE FARMS, INC.'S
DISTRICT NO. 40 v. DIAMOND)	RESPONSE TO SPECIAL
FARMING COMPANY, et al.,)	INTERROGATORIES, SET ONE
Los Angeles Superior Court)	
Case No. BC325201)	
)	
LOS ANGELES COUNTY WATERWORKS)	
DISTRICT NO. 40 v. DIAMOND)	
FARMING COMPANY, et al.,)	
Kern County Superior Court)	
Case No. S-1500-CV-254348)	
)	
DIAMOND FARMING COMPANY, and)	
WM. BOLTHOUSE FARMS, INC., v.)	
CITY OF LANCASTER, et al.,)	
Riverside Superior Court)	
Case No. RIC 344436 [c/w case no.)	
RIC 344668 and 353840])	
)	
ROSAMOND COMMUNITY SERVICES)	
DISTRICT,)	
CROSS-COMPLAINANT,)	

1 COMES NOW cross-defendant, WM. BOLTHOUSE FARMS, INC., and
2 responds to cross-complainant, SHELDON R. BLUM TRUST'S, Special
3 Interrogatories as follows:

4 It should be noted that this responding party has not fully
5 completed investigation of the facts relating to this case, has
6 not fully completed discovery in this action and has not
7 completed preparation for trial. All the responses contained
8 herein are based only upon such information and documents which
9 are presently available to and specifically known to this
10 responding party and disclose only those contentions which
11 presently occur to such responding party. As discovery proceeds,
12 witnesses, facts and evidence may be discovered which are not set
13 forth herein, but which may have been responsive to an
14 Interrogatory.

15 Facts and evidence now known may be imperfectly understood,
16 or the relevance or consequence of such facts and evidence may be
17 imperfectly understood and, accordingly, such facts and evidence
18 may, in good faith, not be included in the following Responses.

19 It is anticipated that further discovery, independent
20 investigation, legal research and analysis will supply additional
21 facts, add meaning to the known facts, as well as establish
22 entire new factual conclusions and legal contentions, all of
23 which may lead to substantial additions to, changes in, and
24 variations from the contentions herein set forth. The following
25 Interrogatory responses are given without prejudice to responding
26 party's right to produce evidence of any subsequently discovered

1 facts or witnesses which this responding party may later recall
2 or discover. Responding party accordingly reserves the right to
3 change any and all Responses herein as additional facts are
4 ascertained, analyses are made, legal research is completed and
5 contentions are made. The Responses contained herein are made in
6 a good faith effort to supply as much factual information and as
7 much specification of legal contentions as is presently known but
8 should in no way be to the prejudice of responding party in
9 relation to further discovery, research and analysis.

10 This responding party assumes no obligation to voluntarily
11 supplement or amend these responses to reflect witnesses, facts
12 and evidence following the filing of these responses. In
13 addition, because some of these responses may have been
14 ascertained by the responding party's attorneys and
15 investigators, this responding party may not have personal
16 knowledge of the information from which these responses are
17 derived.

18 RESPONSES

19 1. Objection. This interrogatory is premature.
20 Notwithstanding the foregoing objections, and reserving same, the
21 affirmative defenses alleged in the Answer of this responding
22 defendant were pleaded in the manner required by law. Further, at
23 all times referred to in the Complaint on file herein, this
24 responding party, its agents, employees and representatives, acted
25 with the same care, caution and diligence required of reasonable
26 persons and/or entities under the same or similar circumstances.

1 Inasmuch as discovery is continuing in this case, this responding
2 party reserves the right to supplement this answer when and if
3 further information becomes available in the future.

4 2. Objection. This interrogatory is premature.
5 Notwithstanding the foregoing objections, and reserving same, see
6 response to Special Interrogatory No. 1.

7 3. Objection. This interrogatory is premature.
8 Notwithstanding the foregoing objections, and reserving same, see
9 response to Special Interrogatory No. 1.

10 4. Objection. This interrogatory is premature.
11 Notwithstanding the foregoing objections, and reserving same, the
12 affirmative defenses alleged in the Answer of this responding
13 defendant were pleaded in the manner required by law. Further, at
14 all times referred to in the Complaint on file herein, this
15 responding party, its agents, employees and representatives, acted
16 with the same care, caution and diligence required of reasonable
17 persons and/or entities under the same or similar circumstances.
18 Inasmuch as discovery is continuing in this case, this responding
19 party reserves the right to supplement this answer when and if
20 further information becomes available in the future.

21 5. Objection. This interrogatory is premature.
22 Notwithstanding the foregoing objections, and reserving same, see
23 response to Special Interrogatory No. 4.

24 6. Objection. This interrogatory is premature.
25 Notwithstanding the foregoing objections, and reserving same, see
26 response to Special Interrogatory No. 4.

1 7. Objection. This interrogatory is premature.
2 Notwithstanding the foregoing objections, and reserving same, the
3 affirmative defenses alleged in the Answer of this responding
4 defendant were pleaded in the manner required by law. Further, at
5 all times referred to in the Complaint on file herein, this
6 responding party, its agents, employees and representatives, acted
7 with the same care, caution and diligence required of reasonable
8 persons and/or entities under the same or similar circumstances.
9 Inasmuch as discovery is continuing in this case, this responding
10 party reserves the right to supplement this answer when and if
11 further information becomes available in the future.

12 8. Objection. This interrogatory is premature.
13 Notwithstanding the foregoing objections, and reserving same, see
14 response to Special Interrogatory No. 7.

15 9. Objection. This interrogatory is premature.
16 Notwithstanding the foregoing objections, and reserving same, see
17 response to Special Interrogatory No. 7.

18 10. Objection. This interrogatory is premature.
19 Notwithstanding the foregoing objections, and reserving same, the
20 affirmative defenses alleged in the Answer of this responding
21 defendant were pleaded in the manner required by law. Further, at
22 all times referred to in the Complaint on file herein, this
23 responding party, its agents, employees and representatives, acted
24 with the same care, caution and diligence required of reasonable
25 persons and/or entities under the same or similar circumstances.
26 Inasmuch as discovery is continuing in this case, this responding

1 party reserves the right to supplement this answer when and if
2 further information becomes available in the future.

3 11. Objection. This interrogatory is premature.
4 Notwithstanding the foregoing objections, and reserving same, see
5 response to Special Interrogatory No. 10.

6 12. Objection. This interrogatory is premature.
7 Notwithstanding the foregoing objections, and reserving same, see
8 response to Special Interrogatory No. 10.

9 13. Objection. This interrogatory is premature.
10 Notwithstanding the foregoing objections, and reserving same, the
11 affirmative defenses alleged in the Answer of this responding
12 defendant were pleaded in the manner required by law. Further, at
13 all times referred to in the Complaint on file herein, this
14 responding party, its agents, employees and representatives, acted
15 with the same care, caution and diligence required of reasonable
16 persons and/or entities under the same or similar circumstances.
17 Inasmuch as discovery is continuing in this case, this responding
18 party reserves the right to supplement this answer when and if
19 further information becomes available in the future.

20 14. Objection. This interrogatory is premature.
21 Notwithstanding the foregoing objections, and reserving same, see
22 response to Special Interrogatory No. 13.

23 15. Objection. This interrogatory is premature.
24 Notwithstanding the foregoing objections, and reserving same, see
25 response to Special Interrogatory No. 13.

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1 16. Objection. This interrogatory is premature.
2 Notwithstanding the foregoing objections, and reserving same, the
3 affirmative defenses alleged in the Answer of this responding
4 defendant were pleaded in the manner required by law. Further, at
5 all times referred to in the Complaint on file herein, this
6 responding party, its agents, employees and representatives, acted
7 with the same care, caution and diligence required of reasonable
8 persons and/or entities under the same or similar circumstances.
9 Inasmuch as discovery is continuing in this case, this responding
10 party reserves the right to supplement this answer when and if
11 further information becomes available in the future.

12 17. Objection. This interrogatory is premature.
13 Notwithstanding the foregoing objections, and reserving same, see
14 response to Special Interrogatory No. 16.

15 18. Objection. This interrogatory is premature.
16 Notwithstanding the foregoing objections, and reserving same, see
17 response to Special Interrogatory No. 16.

18 19. Objection. This interrogatory is premature.
19 Notwithstanding the foregoing objections, and reserving same, the
20 affirmative defenses alleged in the Answer of this responding
21 defendant were pleaded in the manner required by law. Further, at
22 all times referred to in the Complaint on file herein, this
23 responding party, its agents, employees and representatives, acted
24 with the same care, caution and diligence required of reasonable
25 persons and/or entities under the same or similar circumstances.
26 Inasmuch as discovery is continuing in this case, this responding

1 party reserves the right to supplement this answer when and if
2 further information becomes available in the future.

3 20. Objection. This interrogatory is premature.
4 Notwithstanding the foregoing objections, and reserving same, see
5 response to Special Interrogatory No. 19.

6 21. Objection. This interrogatory is premature.
7 Notwithstanding the foregoing objections, and reserving same, see
8 response to Special Interrogatory No. 19.

9 22. Objection. This interrogatory is premature.
10 Notwithstanding the foregoing objections, and reserving same, the
11 affirmative defenses alleged in the Answer of this responding
12 defendant were pleaded in the manner required by law. Further, at
13 all times referred to in the Complaint on file herein, this
14 responding party, its agents, employees and representatives, acted
15 with the same care, caution and diligence required of reasonable
16 persons and/or entities under the same or similar circumstances.
17 Inasmuch as discovery is continuing in this case, this responding
18 party reserves the right to supplement this answer when and if
19 further information becomes available in the future.

20 23. Objection. This interrogatory is premature.
21 Notwithstanding the foregoing objections, and reserving same, see
22 response to Special Interrogatory No. 22.

23 24. Objection. This interrogatory is premature.
24 Notwithstanding the foregoing objections, and reserving same, see
25 response to Special Interrogatory No. 22.

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1 25. Objection. This interrogatory is premature.
2 Notwithstanding the foregoing objections, and reserving same, the
3 affirmative defenses alleged in the Answer of this responding
4 defendant were pleaded in the manner required by law. Further, at
5 all times referred to in the Complaint on file herein, this
6 responding party, its agents, employees and representatives, acted
7 with the same care, caution and diligence required of reasonable
8 persons and/or entities under the same or similar circumstances.
9 Inasmuch as discovery is continuing in this case, this responding
10 party reserves the right to supplement this answer when and if
11 further information becomes available in the future.

12 26. Objection. This interrogatory is premature.
13 Notwithstanding the foregoing objections, and reserving same, see
14 response to Special Interrogatory No. 25.

15 27. Objection. This interrogatory is premature.
16 Notwithstanding the foregoing objections, and reserving same, see
17 response to Special Interrogatory No. 25.

18 28. Objection. This interrogatory is premature.
19 Notwithstanding the foregoing objections, and reserving same, the
20 affirmative defenses alleged in the Answer of this responding
21 defendant were pleaded in the manner required by law. Further, at
22 all times referred to in the Complaint on file herein, this
23 responding party, its agents, employees and representatives, acted
24 with the same care, caution and diligence required of reasonable
25 persons and/or entities under the same or similar circumstances.
26 Inasmuch as discovery is continuing in this case, this responding

1 party reserves the right to supplement this answer when and if
2 further information becomes available in the future.

3 29. Objection. This interrogatory is premature.
4 Notwithstanding the foregoing objections, and reserving same, see
5 response to Special Interrogatory No. 28.

6 30. Objection. This interrogatory is premature.
7 Notwithstanding the foregoing objections, and reserving same, see
8 response to Special Interrogatory No. 28.

9 31. Objection. This interrogatory is premature.
10 Notwithstanding the foregoing objections, and reserving same, the
11 affirmative defenses alleged in the Answer of this responding
12 defendant were pleaded in the manner required by law. Further, at
13 all times referred to in the Complaint on file herein, this
14 responding party, its agents, employees and representatives, acted
15 with the same care, caution and diligence required of reasonable
16 persons and/or entities under the same or similar circumstances.
17 Inasmuch as discovery is continuing in this case, this responding
18 party reserves the right to supplement this answer when and if
19 further information becomes available in the future.

20 32. Objection. This interrogatory is premature.
21 Notwithstanding the foregoing objections, and reserving same, see
22 response to Special Interrogatory No. 31.

23 33. Objection. This interrogatory is premature.
24 Notwithstanding the foregoing objections, and reserving same, see
25 response to Special Interrogatory No. 31.

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1 34. Objection. This interrogatory is vague, ambiguous,
2 overbroad, unduly burdensome, assumes facts, not reasonably
3 calculated to lead to the discovery of admissible evidence and
4 calls for the production of materials protected by the attorney
5 client privilege and/or attorney work product doctrine.
6 Notwithstanding the foregoing objections, and reserving same,
7 responding party is informed and believes that the 1999 Lease
8 Agreement was drafted by Dennis Greer.

9 35. Objection. This interrogatory is vague, ambiguous,
10 overbroad, unduly burdensome, assumes facts, not reasonably
11 calculated to lead to the discovery of admissible evidence and
12 calls for the production of materials protected by the attorney
13 client privilege and/or attorney work product doctrine.
14 Notwithstanding the foregoing objections, and reserving same,
15 responding party has conducted a reasonable search for responsive
16 materials and will comply with this request by producing herewith
17 non-privileged materials.

18 36. Objection. This interrogatory is vague, ambiguous,
19 overbroad, unduly burdensome, assumes facts, not reasonably
20 calculated to lead to the discovery of admissible evidence and
21 calls for the production of materials protected by the attorney
22 client privilege and/or attorney work product doctrine.
23 Notwithstanding the foregoing objections, and reserving same,
24 responding party is informed and believes that the 2001 Lease
25 Agreement was drafted by Dennis Greer.

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1 37. Objection. This interrogatory is vague, ambiguous,
2 overbroad, unduly burdensome, assumes facts, not reasonably
3 calculated to lead to the discovery of admissible evidence and
4 calls for the production of materials protected by the attorney
5 client privilege and/or attorney work product doctrine.
6 Notwithstanding the foregoing objections, and reserving same,
7 responding party has conducted a reasonable search for responsive
8 materials and will comply with this request by producing herewith
9 non-privileged materials.

10 38. Objection. This interrogatory is vague, ambiguous,
11 overbroad, unduly burdensome, assumes facts, not reasonably
12 calculated to lead to the discovery of admissible evidence and
13 calls for the production of materials protected by the attorney
14 client privilege and/or attorney work product doctrine.
15 Notwithstanding the foregoing objections, and reserving same,
16 responding party is informed and believes that the 2004
17 Modification to Lease Agreement was drafted by Dennis Greer.

18 39. Objection. This interrogatory is vague, ambiguous,
19 overbroad, unduly burdensome, assumes facts, not reasonably
20 calculated to lead to the discovery of admissible evidence and
21 calls for the production of materials protected by the attorney
22 client privilege and/or attorney work product doctrine.
23 Notwithstanding the foregoing objections, and reserving same,
24 responding party has conducted a reasonable search for responsive
25 materials and will comply with this request by producing herewith
26 non-privileged materials.

1 40. Objection. This interrogatory is vague, ambiguous,
2 overbroad, unduly burdensome, assumes facts and is not reasonably
3 calculated to lead to the discovery of admissible evidence.
4 Notwithstanding the foregoing objections, and reserving same, yes.

5 41. Objection. This interrogatory is vague, ambiguous,
6 overbroad, unduly burdensome, assumes facts and is not reasonably
7 calculated to lead to the discovery of admissible evidence.
8 Notwithstanding the foregoing objections, and reserving same,
9 Larry W. Rottman, Rottman Drilling Co., 46471 Division Street,
10 Lancaster, California, and Robert Huckaby, former employee of Wm.
11 Bolthouse Farms, Inc., 7200 E. Brundage Lane, Bakersfield,
12 California.

13 42. Objection. This interrogatory is vague, ambiguous,
14 overbroad, unduly burdensome, assumes facts, not reasonably
15 calculated to lead to the discovery of admissible evidence and
16 calls for the production of materials protected by the attorney
17 client privilege and/or attorney work product doctrine.
18 Notwithstanding the foregoing objections, and reserving same,
19 responding party has conducted a reasonable search for responsive
20 materials and will comply with this request by producing herewith
21 non-privileged materials.

22 43. Objection. This interrogatory is vague, ambiguous,
23 overbroad, unduly burdensome, assumes facts and is not reasonably
24 calculated to lead to the discovery of admissible evidence.
25 Notwithstanding the foregoing objections, and reserving same, no.

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1 44. Objection. This interrogatory is vague, ambiguous,
2 overbroad, unduly burdensome, assumes facts and is not reasonably
3 calculated to lead to the discovery of admissible evidence.
4 Notwithstanding the foregoing objections, and reserving same, see
5 response to Special Interrogatory No. 43.

6 45. Objection. This interrogatory is vague, ambiguous,
7 overbroad, unduly burdensome, assumes facts and is not reasonably
8 calculated to lead to the discovery of admissible evidence.
9 Notwithstanding the foregoing objections, and reserving same, see
10 response to Special Interrogatory No. 43.

11 46. Objection. This interrogatory is vague, ambiguous,
12 overbroad, unduly burdensome, assumes facts and is not reasonably
13 calculated to lead to the discovery of admissible evidence.
14 Notwithstanding the foregoing objections, and reserving same, no.

15 47. Objection. This interrogatory is vague, ambiguous,
16 overbroad, unduly burdensome, assumes facts and is not reasonably
17 calculated to lead to the discovery of admissible evidence.
18 Notwithstanding the foregoing objections, and reserving same, see
19 response to Special Interrogatory No. 46.

20 48. Objection. This interrogatory is vague, ambiguous,
21 overbroad, unduly burdensome, assumes facts and is not reasonably
22 calculated to lead to the discovery of admissible evidence.
23 Notwithstanding the foregoing objections, and reserving same, see
24 response to Special Interrogatory No. 46.

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1 49. Objection. This interrogatory is compound, vague,
2 ambiguous, overbroad, unduly burdensome, argumentative, assumes
3 facts and is not reasonably calculated to lead to the discovery of
4 admissible evidence. Notwithstanding the foregoing objections,
5 and reserving same, the 2001 Lease Agreement and all subsequent
6 modifications thereto, do not require responding party to
7 undertake any such action.

8 50. Objection. This interrogatory is vague, ambiguous,
9 overbroad, unduly burdensome, assumes facts, not reasonably
10 calculated to lead to the discovery of admissible evidence and
11 calls for the production of materials protected by the attorney
12 client privilege and/or attorney work product doctrine.

13 51. Objection. This interrogatory is compound, vague,
14 ambiguous, overbroad, unintelligible, unduly burdensome,
15 argumentative, assumes facts and is not reasonably calculated to
16 lead to the discovery of admissible evidence. Notwithstanding the
17 foregoing objections, and reserving same, responding party never
18 notified BLUM of any approval or disapproval of the condition of
19 the wells on the SUBJECT PROPERTY.

20 52. Objection. This interrogatory is compound, vague,
21 ambiguous, overbroad, unintelligible, unduly burdensome,
22 argumentative, assumes facts and is not reasonably calculated to
23 lead to the discovery of admissible evidence. Notwithstanding the
24 foregoing objections, and reserving same, the 2001 Lease Agreement
25 and all subsequent modifications thereto, do not require
26 responding party to make a decision regarding approval or

1 disapproval and thereafter undertake any such action.

2 53. Objection. This interrogatory is compound, vague,
3 ambiguous, overbroad, unintelligible, unduly burdensome,
4 argumentative, assumes facts and is not reasonably calculated to
5 lead to the discovery of admissible evidence. Notwithstanding the
6 foregoing objections, and reserving same, responding party refers
7 BLUM to Paragraph 8 of the 2001 Lease Agreement.

8 54. Objection. This interrogatory is compound, vague,
9 ambiguous, overbroad, unintelligible, unduly burdensome,
10 argumentative, assumes facts and is not reasonably calculated to
11 lead to the discovery of admissible evidence. Notwithstanding the
12 foregoing objections, and reserving same, responding party refers
13 BLUM to Paragraph 8 of the 2001 Lease Agreement.

14 55. Objection. This interrogatory is compound, vague,
15 ambiguous, overbroad, unintelligible, unduly burdensome,
16 argumentative, assumes facts and is not reasonably calculated to
17 lead to the discovery of admissible evidence.

18 56. Objection. This interrogatory is compound, vague,
19 ambiguous, overbroad, unintelligible, unduly burdensome,
20 argumentative, assumes facts and is not reasonably calculated to
21 lead to the discovery of admissible evidence. Notwithstanding the
22 foregoing objections, and reserving same, responding party refers
23 BLUM to Paragraph 8 of the 2001 Lease Agreement.

24 57. Objection. This interrogatory is vague, ambiguous,
25 overbroad, and assumes facts. Notwithstanding the foregoing
26 objections, and reserving same, none.

1 58. Objection. This interrogatory is vague, ambiguous,
2 overbroad, and assumes facts. Notwithstanding the foregoing
3 objections, and reserving same, see response to Special
4 Interrogatory No. 57.

5 59. Objection. This interrogatory is vague, ambiguous,
6 overbroad, and assumes facts. Notwithstanding the foregoing
7 objections, and reserving same, see response to Special
8 Interrogatory No. 57.

9 60. Objection. This interrogatory is compound, vague,
10 ambiguous, overbroad, unintelligible, unduly burdensome,
11 argumentative, assumes facts and is not reasonably calculated to
12 lead to the discovery of admissible evidence. Notwithstanding the
13 foregoing objections, and reserving same, responding party refers
14 BLUM to Paragraph 8 of the 2001 Lease Agreement.

15 61. Objection. This interrogatory is vague, ambiguous,
16 overbroad, unduly burdensome, assumes facts, not reasonably
17 calculated to lead to the discovery of admissible evidence and
18 calls for the production of materials protected by the attorney
19 client privilege and/or attorney work product doctrine.

20 62. Objection. This interrogatory is vague, ambiguous,
21 overbroad, unduly burdensome, assumes facts, not reasonably
22 calculated to lead to the discovery of admissible evidence and
23 calls for the production of materials protected by the attorney
24 client privilege and/or attorney work product doctrine.
25 Notwithstanding the foregoing objections, and reserving same,
26 responding party refers BLUM to Paragraph 8 of the 2001 Lease

1 Agreement.

2 63. Objection. This interrogatory is vague, ambiguous,
3 overbroad, assumes facts, not reasonably calculated to lead to the
4 discovery of admissible evidence, calls for the disclosure of
5 private or proprietary corporate information/documents.

6 64. Objection. This interrogatory is vague, ambiguous,
7 overbroad, assumes facts, not reasonably calculated to lead to the
8 discovery of admissible evidence, calls for the disclosure of
9 private or proprietary corporate information/documents.

10 65. Objection. This interrogatory is vague, ambiguous,
11 overbroad, assumes facts, not reasonably calculated to lead to the
12 discovery of admissible evidence, calls for the disclosure of
13 private or proprietary corporate information/documents.

14 66. Objection. This interrogatory is vague, ambiguous,
15 overbroad, assumes facts, not reasonably calculated to lead to the
16 discovery of admissible evidence, calls for the disclosure of
17 private or proprietary corporate information/documents.

18 67. Objection. This interrogatory is vague, ambiguous,
19 overbroad, assumes facts, not reasonably calculated to lead to the
20 discovery of admissible evidence, calls for the disclosure of
21 private or proprietary corporate information/documents.

22 68. Objection. This interrogatory is vague, ambiguous,
23 overbroad, assumes facts, not reasonably calculated to lead to the
24 discovery of admissible evidence, calls for the disclosure of
25 private or proprietary corporate information/documents.

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1 69. To provide water for agricultural irrigation purposes.

2 70. Calandri/Son Rise Farms, LP, 40445 27th Street West,

3 Palmdale, California.

4 71. Objection. This interrogatory is vague, ambiguous and

5 overbroad. Notwithstanding the forgoing objections, and

6 reserving same, Michael W. Kovacevich, Ag Properties/Legal

7 Manager, Wm. Bolthouse Farms, Inc., 7200 E. Brundage Lane,

8 Bakersfield, California.

9 72. 2004 Agricultural Lease, 2005 Farm Lease and 2005

10 Amendment to Farm Lease.

11 73. Objection. This interrogatory is vague, ambiguous,

12 overbroad, assumes facts, not reasonably calculated to lead to the

13 discovery of admissible evidence, calls for the disclosure of

14 private or proprietary corporate information/documents.

15 74. Calandri/Son Rise Farms, LP, 40445 27th Street West,

16 Palmdale, California.

17 75. Objection. This interrogatory is vague, ambiguous and

18 overbroad. Notwithstanding the forgoing objections, and

19 reserving same, Michael W. Kovacevich, Ag Properties/Legal

20 Manager, Wm. Bolthouse Farms, Inc., 7200 E. Brundage Lane,

21 Bakersfield, California.

22 76. 2004 Agricultural Lease, 2005 Farm Lease and 2005

23 Amendment to Farm Lease.

24 77. Objection. This interrogatory is vague, ambiguous,

25 overbroad, assumes facts, not reasonably calculated to lead to the

26 discovery of admissible evidence, calls for the disclosure of

1 private or proprietary corporate information/documents.

2 78. None.

3 79. Objection. This interrogatory is vague, ambiguous and
4 overbroad. Notwithstanding the forgoing objections, and
5 reserving same, Michael W. Kovacevich, Ag Properties/Legal
6 Manager, Wm. Bolthouse Farms, Inc., 7200 E. Brundage Lane,
7 Bakersfield, California.

8 80. Not applicable, see response to Interrogatory No. 78.

9 81. Not applicable, see response to Interrogatory No. 78.

10 82. None.

11 83. Objection. This interrogatory is vague, ambiguous and
12 overbroad. Notwithstanding the forgoing objections, and
13 reserving same, Michael W. Kovacevich, Ag Properties/Legal
14 Manager, Wm. Bolthouse Farms, Inc., 7200 E. Brundage Lane,
15 Bakersfield, California.

16 84. Not applicable, see response to Interrogatory No. 78.

17 85. Not applicable, see response to Interrogatory No. 78.

18 86. None.

19 87. Objection. This interrogatory is vague, ambiguous and
20 overbroad. Notwithstanding the forgoing objections, and
21 reserving same, Michael W. Kovacevich, Ag Properties/Legal
22 Manager, Wm. Bolthouse Farms, Inc., 7200 E. Brundage Lane,
23 Bakersfield, California.

24 88. Not applicable, see response to Interrogatory No. 86.

25 89. Not applicable, see response to Interrogatory No. 86.

26 90. None.

1 91. Objection. This interrogatory is vague, ambiguous and
2 overbroad. Notwithstanding the forgoing objections, and
3 reserving same, Michael W. Kovacevich, Ag Properties/Legal
4 Manager, Wm. Bolthouse Farms, Inc., 7200 E. Brundage Lane,
5 Bakersfield, California.

6 92. Not applicable, see response to Interrogatory No. 90.

7 93. Not applicable, see response to Interrogatory No. 90.

8 94. None.

9 95. Not applicable, see response to Interrogatory No. 94.

10 96. Not applicable, see response to Interrogatory No. 94.

11 97. Not applicable, see response to Interrogatory No. 94.

12 98. Objection. This interrogatory is vague, ambiguous,
13 assumes facts, calls for legal opinion and is overbroad.
14 Notwithstanding the foregoing objections, and reserving same, WM.
15 BOLTHOUSE FARMS, INC. and BOLTHOUSE PROPERTIES, LLC, to the
16 extent they own property in the groundwater basin, have
17 correlative groundwater rights as to overlying landowners.

18 99. Objection. This interrogatory is vague, ambiguous,
19 assumes facts, calls for legal opinion and is overbroad.
20 Notwithstanding the foregoing objections, and reserving same, WM.
21 BOLTHOUSE FARMS, INC. and BOLTHOUSE PROPERTIES, LLC, to the
22 extent they own property in the groundwater basin, have
23 correlative groundwater rights as to overlying landowners..

24 100. Objection. This interrogatory is vague, ambiguous,
25 assumes facts, calls for legal opinion and is overbroad.

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1 101. Objection. This interrogatory is vague, ambiguous,
2 overbroad, unintelligible, calls for a legal conclusion and calls
3 for the disclosure of attorney client privileged communications
4 or attorney work product.

5 102. Objection. This interrogatory is vague, ambiguous,
6 assumes facts, calls for legal opinion and is overbroad.
7 Notwithstanding the foregoing objections, and reserving same, WM.
8 BOLTHOUSE FARMS, INC. and BOLTHOUSE PROPERTIES, LLC, to the
9 extent they own property in the groundwater basin, have
10 correlative groundwater rights as to overlying landowners.

11 103. Objection. This interrogatory is vague, ambiguous,
12 assumes facts, calls for legal opinion and is overbroad.
13 Notwithstanding the foregoing objections, and reserving same, WM.
14 BOLTHOUSE FARMS, INC. and BOLTHOUSE PROPERTIES, LLC, to the
15 extent they own property in the groundwater basin, have
16 correlative groundwater rights as to overlying landowners.

17 104. Objection. This interrogatory is vague, ambiguous,
18 assumes facts, calls for legal opinion and is overbroad.

19 105. Objection. This interrogatory is vague, ambiguous,
20 overbroad, unintelligible, calls for a legal conclusion and calls
21 for the disclosure of attorney client privileged communications
22 or attorney work product.

23 106. Despite a reasonable search and diligent effort,
24 unknown. Responding party is informed and believes that any such
25 information may be obtained from documents maintained by
26 government permitting entities.

1 107. Despite a reasonable search and diligent effort,
2 unknown. Responding party is informed and believes that any such
3 information may be obtained from documents maintained by
4 government permitting entities.

5 108. Objection. This interrogatory is vague, ambiguous and
6 overbroad. Notwithstanding the forgoing objections, and
7 reserving same, Michael W. Kovacevich, Ag Properties Legal
8 Manager, Wm. Bolthouse Farms, Inc., 7200 E. Brundage Lane,
9 Bakersfield, California.

10 109. Despite a reasonable search and diligent effort,
11 responding party is not in possession of responsive non-
12 privileged documents. Responding party is informed and believes
13 that any such information may be obtained from documents
14 maintained by government permitting entities.

15 110. Objection. This interrogatory is vague, ambiguous,
16 compound, overbroad, unintelligible, assumes facts, not reasonably
17 calculated to lead to the discovery of admissible evidence, calls
18 for the disclosure of private or proprietary corporate
19 information/documents.

20 111. Objection. This interrogatory is vague, ambiguous,
21 overbroad, assumes facts, not reasonably calculated to lead to the
22 discovery of admissible evidence, calls for the disclosure of
23 private or proprietary corporate information/documents.

24 112. Objection. This interrogatory is vague, ambiguous,
25 overbroad, assumes facts, not reasonably calculated to lead to the
26 discovery of admissible evidence, calls for the disclosure of

1 private or proprietary corporate information/documents.

2 113. Objection. This interrogatory is vague and ambiguous.
3 Notwithstanding the foregoing objections, and reserving same, no.

4 114. Objection. This interrogatory is vague, ambiguous,
5 overbroad, assumes facts and unintelligible.

6 115. Objection. This interrogatory is vague, ambiguous,
7 overbroad, assumes facts and unintelligible.

8 116. Objection. This interrogatory is vague, ambiguous,
9 overbroad, assumes facts, not reasonably calculated to lead to the
10 discovery of admissible evidence, calls for the disclosure of
11 private or proprietary corporate information/documents.
12 Notwithstanding the foregoing objections, and reserving same, no
13 such forms were prepared by responding party relating to
14 extractions on the SUBJECT PROPERTY because no water was extracted
15 therefrom.

16 117. Michael W. Kovacevich, Ag Properties/Legal Manager, and
17 Daniel Wilke, Irrigation Manager, Wm. Bolthouse Farms, Inc., 7200
18 E. Brundage Lane, Bakersfield, California.

19 118. Objection. This interrogatory is vague, ambiguous,
20 overbroad, assumes facts and unintelligible. Notwithstanding the
21 foregoing objections, and reserving same, basic arithmetic.

22 119. Objection. This interrogatory is vague, ambiguous,
23 overbroad, assumes facts and unintelligible.

24 120. Objection. This interrogatory is vague, ambiguous,
25 overbroad, not reasonably calculated to lead to the discovery of
26 admissible evidence, calls for the disclosure of private or

1 proprietary corporate information/documents.

2 121. Objection. This interrogatory is vague, ambiguous,
3 overbroad, not reasonably calculated to lead to the discovery of
4 admissible evidence, calls for the disclosure of private or
5 proprietary corporate information/documents.

6 122. Objection. This interrogatory is vague, ambiguous,
7 overbroad, not reasonably calculated to lead to the discovery of
8 admissible evidence, calls for the disclosure of private or
9 proprietary corporate information/documents.

10 123. Objection. This interrogatory is vague, ambiguous,
11 overbroad, not reasonably calculated to lead to the discovery of
12 admissible evidence, calls for the disclosure of private or
13 proprietary corporate information/documents.

14 124. Objection. This interrogatory is vague, ambiguous,
15 overbroad, not reasonably calculated to lead to the discovery of
16 admissible evidence, calls for the disclosure of private or
17 proprietary corporate information/documents.

18 125. Objection. This interrogatory is vague, ambiguous,
19 overbroad, not reasonably calculated to lead to the discovery of
20 admissible evidence, calls for the disclosure of private or
21 proprietary corporate information/documents.

22 126. Objection. This interrogatory is vague, ambiguous,
23 overbroad, not reasonably calculated to lead to the discovery of
24 admissible evidence, calls for the disclosure of private or
25 proprietary corporate information/documents.

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1 127. Objection. This interrogatory is vague, ambiguous,
2 overbroad, not reasonably calculated to lead to the discovery of
3 admissible evidence, calls for the disclosure of private or
4 proprietary corporate information/documents.

5 128. Objection. This interrogatory is vague, ambiguous,
6 overbroad, not reasonably calculated to lead to the discovery of
7 admissible evidence, calls for the disclosure of private or
8 proprietary corporate information/documents.

9 129. Objection. This interrogatory is vague, ambiguous,
10 overbroad, not reasonably calculated to lead to the discovery of
11 admissible evidence and calls for a legal conclusion.
12 Notwithstanding the foregoing objections, and reserving same,
13 Cross-Complainant herein is not a party to the Second Amended
14 Complaint. Please refer to the court's ruling on your pleadings
15 attacking the Second Amended Complaint.

16 130. Objection. This interrogatory is vague, ambiguous,
17 overbroad and not reasonably calculated to lead to the discovery
18 of admissible evidence.

19 131. Objection. This interrogatory is vague, ambiguous,
20 overbroad and not reasonably calculated to lead to the discovery
21 of admissible evidence.

22 132. Objection. This interrogatory is vague, ambiguous,
23 overbroad and not reasonably calculated to lead to the discovery
24 of admissible evidence.

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1 133. Objection. This interrogatory is vague, ambiguous,
2 overbroad and not reasonably calculated to lead to the discovery
3 of admissible evidence.

4 134. Objection. This interrogatory is vague, ambiguous,
5 overbroad and not reasonably calculated to lead to the discovery
6 of admissible evidence.

7 135. Objection. This interrogatory is vague and ambiguous.
8 Notwithstanding the foregoing objections, and reserving same,
9 there is no express authorization, nor is there an express or
10 implied prohibition.

11 136. Objection. This interrogatory is vague, ambiguous,
12 overbroad, not reasonably calculated to lead to the discovery of
13 admissible evidence, calls for the disclosure of private or
14 proprietary corporate information/documents.

15 137. Objection. This interrogatory is vague, ambiguous,
16 overbroad, not reasonably calculated to lead to the discovery of
17 admissible evidence, calls for the disclosure of private or
18 proprietary corporate information/documents.

19 138. Objection. This interrogatory is vague, ambiguous,
20 overbroad, not reasonably calculated to lead to the discovery of
21 admissible evidence, calls for the disclosure of private or
22 proprietary corporate information/documents.

23 139. Objection. This interrogatory is vague, ambiguous,
24 overbroad, not reasonably calculated to lead to the discovery of
25 admissible evidence, calls for the disclosure of private or
26 proprietary corporate information/documents.

1 140. Objection. This interrogatory is vague, ambiguous,
2 overbroad, not reasonably calculated to lead to the discovery of
3 admissible evidence, calls for the disclosure of private or
4 proprietary corporate information/documents.

5 141. Objection. This interrogatory is vague, ambiguous,
6 overbroad, not reasonably calculated to lead to the discovery of
7 admissible evidence, calls for the disclosure of private or
8 proprietary corporate information/documents.

9 142. Objection. This interrogatory is vague, ambiguous,
10 overbroad, not reasonably calculated to lead to the discovery of
11 admissible evidence, calls for the disclosure of private or
12 proprietary corporate information/documents.

13 143. Objection. This interrogatory is vague, ambiguous,
14 overbroad, not reasonably calculated to lead to the discovery of
15 admissible evidence, calls for the disclosure of private or
16 proprietary corporate information/documents.

17 144. Objection. This interrogatory is vague, ambiguous,
18 overbroad, not reasonably calculated to lead to the discovery of
19 admissible evidence, calls for the disclosure of private or
20 proprietary corporate information/documents.

21 145. Objection. This interrogatory is vague, ambiguous,
22 overbroad, not reasonably calculated to lead to the discovery of
23 admissible evidence, calls for the disclosure of private or
24 proprietary corporate information/documents.

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1 146. Objection. This interrogatory is vague, ambiguous,
2 overbroad, not reasonably calculated to lead to the discovery of
3 admissible evidence, calls for the disclosure of private or
4 proprietary corporate information/documents.

5 147. Objection. This interrogatory is vague, ambiguous,
6 overbroad, unintelligible, calls for a legal conclusion and calls
7 for the disclosure of attorney client privileged communications
8 or attorney work product. Notwithstanding the foregoing
9 objections, and reserving same, the documents speak for
10 themselves. See also response to Special Interrogatories 94 and
11 98.

12 148. Objection. This interrogatory is vague, ambiguous,
13 overbroad, unintelligible, calls for a legal conclusion and calls
14 for the disclosure of attorney client privileged communications
15 or attorney work product. Notwithstanding the foregoing
16 objections, and reserving same, the documents speak for
17 themselves.

18 149. Objection. This interrogatory is vague, ambiguous,
19 overbroad, unintelligible, calls for a legal conclusion and calls
20 for the disclosure of attorney client privileged communications
21 or attorney work product.

22 150. Objection. This interrogatory is vague, ambiguous and
23 overbroad. Notwithstanding the foregoing objections, and
24 reserving same, inadvertent oversight.

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1 151. Objection. This interrogatory is vague, ambiguous and
2 overbroad. Notwithstanding the foregoing objections, and
3 reserving same, none.

4 152. Objection. This interrogatory is vague, ambiguous and
5 overbroad. Notwithstanding the foregoing objections, and
6 reserving same, see response to Special Interrogatory No. 151.

7 153. Objection. This interrogatory is vague, ambiguous and
8 overbroad. Notwithstanding the foregoing objections, and
9 reserving same, see response to Special Interrogatory No. 151.

10 154. Objection. This interrogatory is vague, ambiguous and
11 assumes facts. Notwithstanding the foregoing objections, and
12 reserving same, inadvertent oversight.

13 155. Objection. This interrogatory is vague, ambiguous and
14 assumes facts. Notwithstanding the foregoing objections, and
15 reserving same, see response to Special Interrogatory No. 154.

16 156. Objection. This interrogatory is vague, ambiguous and
17 assumes facts. Notwithstanding the foregoing objections, and
18 reserving same, see response to Special Interrogatory No. 154.

19 157. Objection. This interrogatory is vague, ambiguous,
20 overbroad, calls for a legal conclusion, attorney client
21 communications and/or attorney work product. Notwithstanding the
22 foregoing objections, and reserving same, no such contention is
23 made.

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1 158. Objection. This interrogatory is vague, ambiguous,
2 overbroad, not reasonably calculated to lead to the discovery of
3 admissible evidence, calls for the disclosure of private or
4 proprietary corporate information/documents.

5 159. Objection. This interrogatory is vague, ambiguous,
6 overbroad, not reasonably calculated to lead to the discovery of
7 admissible evidence, calls for the disclosure of private or
8 proprietary corporate information/documents.

9 160. Objection. This interrogatory is vague, ambiguous,
10 overbroad, not reasonably calculated to lead to the discovery of
11 admissible evidence, calls for the disclosure of private or
12 proprietary corporate information/documents.

13 161. Objection. This interrogatory is vague, ambiguous,
14 overbroad, not reasonably calculated to lead to the discovery of
15 admissible evidence, calls for the disclosure of private or
16 proprietary corporate information/documents.

17 162. Objection. This interrogatory is vague, ambiguous,
18 overbroad, not reasonably calculated to lead to the discovery of
19 admissible evidence, calls for the disclosure of private or
20 proprietary corporate information/documents.

21 163. Objection. This interrogatory is vague, ambiguous,
22 overbroad, not reasonably calculated to lead to the discovery of
23 admissible evidence, calls for the disclosure of private or
24 proprietary corporate information/documents. Notwithstanding the
25 foregoing objections, and reserving same, responding party is not
26 aware of any such communications.

1 164. Objection. This interrogatory is vague, ambiguous,
2 overbroad, not reasonably calculated to lead to the discovery of
3 admissible evidence, calls for the disclosure of private or
4 proprietary corporate information/documents.

5 165. Objection. This interrogatory is vague, ambiguous,
6 overbroad, not reasonably calculated to lead to the discovery of
7 admissible evidence, calls for the disclosure of private or
8 proprietary corporate information/documents.

9 DATED: April 28, 2008

10 CLIFFORD & BROWN

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12
13 By: 

RICHARD G. ZIMMER, ESQ.

T. MARK SMITH, ESQ.

JEREMY J. SCHROEDER, ESQ.

Attorneys for

BOLTHOUSE FARMS, INC. and

BOLTHOUSE PROPERTIES, LLC

VERIFICATION TO FOLLOW

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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, Bakersfield, CA 93301.

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