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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
	)	
<b>ANTELOPE VALLEY GROUNDWATER</b>	)	CASE NO. 1-05-CV-049053
<b>CASES</b>	)	
	)	
INCLUDED ACTIONS:	)	
	)	
LOS ANGELES COUNTY WATERWORKS	)	<b>BOLTHOUSE PROPERTIES, LLC'S</b>
DISTRICT NO. 40 v. DIAMOND	)	<b>RESPONSE TO SPECIAL</b>
FARMING COMPANY, et al.,	)	<b>INTERROGATORIES, SET ONE</b>
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, BOLTHOUSE PROPERTIES, LLC, 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.

26 ///

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.

26 ///



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

25   ///

26   ////

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

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

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

16           32. Objection. This interrogatory is vague, ambiguous,  
17 premature and overbroad. Notwithstanding the foregoing  
18 objections, and reserving same, see response to Special  
19 Interrogatory No. 31.

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

24           34. Objection. This interrogatory is vague, ambiguous,  
25 premature and overbroad. Notwithstanding the foregoing  
26 objections, and reserving same, WM. BOLTHOUSE FARMS, INC. is a

1 lessee of the SUBJECT PROPERTY. WM. BOLTHOUSE FARMS, INC. lease  
2 water rights regarding the SUBJECT PROPERTY are set forth in the  
3 lease agreement and are contractual in nature. BOLTHOUSE  
4 PROPERTIES, LLC does not lease any property from BLUM, and does  
5 not have any leasehold or contractual water rights relationship  
6 with BLUM.

7 35. Objection. This interrogatory is vague, ambiguous,  
8 premature and overbroad. Notwithstanding the foregoing  
9 objections, and reserving same, see response to Special  
10 Interrogatory No. 34.

11 36. Objection. This interrogatory is vague, ambiguous,  
12 premature and overbroad. Notwithstanding the foregoing  
13 objections, and reserving same, see response to Special  
14 Interrogatory No. 34.

15 37. Objection. This interrogatory is vague, ambiguous and  
16 overbroad. Notwithstanding the foregoing objections, and  
17 reserving same, as to responding party, no.

18 38. Objection. This interrogatory is vague, ambiguous and  
19 overbroad. Notwithstanding the foregoing objections, and  
20 reserving same, see response to Special Interrogatory No. 37.

21 39. Objection. This interrogatory is vague, ambiguous and  
22 overbroad. Notwithstanding the foregoing objections, and  
23 reserving same, see response to Special Interrogatory No. 37.

24 40. Objection. This interrogatory is vague, ambiguous and  
25 overbroad. Notwithstanding the foregoing objections, and  
26 reserving same, as to responding party, no.

1           41. Objection. This interrogatory is vague, ambiguous and  
2 overbroad. Notwithstanding the foregoing objections, and  
3 reserving same, see response to Special Interrogatory No. 40.

4           42. Objection. This interrogatory is vague, ambiguous and  
5 overbroad. Notwithstanding the foregoing objections, and  
6 reserving same, see response to Special Interrogatory No. 40.

7           43. Objection. This interrogatory is vague, ambiguous,  
8 premature and overbroad. Notwithstanding the foregoing  
9 objections, and reserving same, WM. BOLTHOUSE FARMS, INC. is a  
10 lessee of the SUBJECT PROPERTY. WM. BOLTHOUSE FARMS, INC. lease  
11 water rights regarding the SUBJECT PROPERTY are set forth in the  
12 lease agreement and are contractual in nature. BOLTHOUSE  
13 PROPERTIES, LLC does not lease any property from BLUM, and does  
14 not have any leasehold or contractual water rights relationship  
15 with BLUM.

16           44. Objection. This interrogatory is vague, ambiguous,  
17 assumes facts and is overbroad. Notwithstanding the foregoing  
18 objections, and reserving same, see response to Special  
19 Interrogatory No. 43.

20           45. Objection. This interrogatory is vague, ambiguous,  
21 assumes facts and is overbroad. Notwithstanding the foregoing  
22 objections, and reserving same, see response to Special  
23 Interrogatory No. 43.

24           46. 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 47. 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 48. 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 49. 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 50. 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 51. 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 52. 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           53. Objection. This interrogatory is vague, ambiguous,  
2 premature and overbroad. Notwithstanding the foregoing  
3 objections, and reserving same, WM. BOLTHOUSE FARMS, INC. is a  
4 lessee of the SUBJECT PROPERTY. WM. BOLTHOUSE FARMS, INC. lease  
5 water rights regarding the SUBJECT PROPERTY are set forth in the  
6 lease agreement and are contractual in nature. BOLTHOUSE  
7 PROPERTIES, LLC does not lease any property from BLUM, and does  
8 not have any leasehold or contractual water rights relationship  
9 with BLUM.

10          54. Objection. This interrogatory is vague, ambiguous,  
11 assumes facts and is overbroad. Notwithstanding the foregoing  
12 objections, and reserving same, see response to Special  
13 Interrogatory No. 53.

14          55. Objection. This interrogatory is vague, ambiguous,  
15 assumes facts and is overbroad. Notwithstanding the foregoing  
16 objections, and reserving same, see response to Special  
17 Interrogatory No. 53.

18          56. Objection. This interrogatory is vague, ambiguous,  
19 assumes facts and is overbroad. Notwithstanding the foregoing  
20 objections, and reserving same, see response to Special  
21 Interrogatory No. 53.

22          57. 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.

26    ///

1           58. Objection. This interrogatory is vague, ambiguous,  
2 premature and overbroad. Notwithstanding the foregoing  
3 objections, and reserving same, WM. BOLTHOUSE FARMS, INC. is a  
4 lessee of the SUBJECT PROPERTY. WM. BOLTHOUSE FARMS, INC. lease  
5 water rights regarding the SUBJECT PROPERTY are set forth in the  
6 lease agreement and are contractual in nature. BOLTHOUSE  
7 PROPERTIES, LLC does not lease any property from BLUM, and does  
8 not have any leasehold or contractual water rights relationship  
9 with BLUM.

10          59. 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          60. Objection. This interrogatory is vague, ambiguous,  
15 assumes facts and is overbroad. Notwithstanding the foregoing  
16 objections, and reserving same, see response to Special  
17 Interrogatory No. 59.

18          61. Objection. This interrogatory is vague, ambiguous,  
19 overbroad and directed to the wrong party.

20          62. Objection. This interrogatory is vague, ambiguous,  
21 overbroad and directed to the wrong party.

22          63. Objection. This interrogatory is vague, ambiguous,  
23 overbroad and directed to the wrong party.

24          64. Objection. This interrogatory is vague, ambiguous,  
25 overbroad. Notwithstanding the foregoing objections, and  
26 reserving same, no.

1           65. Objection. This interrogatory is vague, ambiguous,  
2 overbroad and directed to the wrong party.

3           66. Objection. This interrogatory is vague, ambiguous,  
4 overbroad and directed to the wrong party.

5           67. Objection. This interrogatory is vague, ambiguous,  
6 overbroad and directed to the wrong party.

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

11          69. 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          70. Objection. This interrogatory is vague, ambiguous,  
16 overbroad, assumes facts, not reasonably calculated to lead to the  
17 discovery of admissible evidence, calls for the disclosure of  
18 private or proprietary corporate information/documents.

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

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



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

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

10          75. Objection. This interrogatory is vague, ambiguous,  
11 overbroad, assumes facts and directed to the wrong party.

12          76. Objection. This interrogatory is vague, ambiguous,  
13 overbroad, assumes facts and directed to the wrong party.

14          77. Objection. This interrogatory is vague, ambiguous,  
15 overbroad, assumes facts and directed to the wrong party.

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

20          79. 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          80. 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 81. 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 82. 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 83. 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 84. 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 85. 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 86. Objection. This interrogatory is vague, ambiguous,  
23 overbroad, not reasonably calculated to lead to the discovery of  
24 admissible evidence and calls for a legal conclusion.  
25 Notwithstanding the foregoing objections, and reserving same,  
26 Cross-Complainant herein is not a party to the Cross-Complaint.

1 Please refer to the court's ruling on your pleadings attacking the  
2 Cross-Complaint.

3 87. Objection. This interrogatory is vague, ambiguous,  
4 overbroad, not reasonably calculated to lead to the discovery of  
5 admissible evidence and calls for a legal conclusion.  
6 Notwithstanding the foregoing objections, and reserving same,  
7 Cross-Complainant herein is not a party to the Cross-Complaint.  
8 Please refer to the court's ruling on your pleadings attacking the  
9 Cross-Complaint.

10 88. Objection. This interrogatory is vague, ambiguous,  
11 overbroad, not reasonably calculated to lead to the discovery of  
12 admissible evidence and calls for a legal conclusion.

13 89. Objection. This interrogatory is vague, ambiguous,  
14 overbroad, not reasonably calculated to lead to the discovery of  
15 admissible evidence and calls for a legal conclusion.

16 90. Objection. This interrogatory is vague, ambiguous,  
17 overbroad, not reasonably calculated to lead to the discovery of  
18 admissible evidence, calls for a legal conclusion, unintelligible  
19 and calls for information equally available to requesting party  
20 via court records.

21 91. Objection. This interrogatory is vague, ambiguous,  
22 overbroad, not reasonably calculated to lead to the discovery of  
23 admissible evidence, calls for a legal conclusion, unintelligible  
24 and calls for information equally available to requesting party  
25 via court records.

26 ///

1           92. Objection. This interrogatory is vague, ambiguous,  
2 premature and overbroad. Notwithstanding the foregoing  
3 objections, and reserving same, WM. BOLTHOUSE FARMS, INC. is a  
4 lessee of the SUBJECT PROPERTY. WM. BOLTHOUSE FARMS, INC. lease  
5 water rights regarding the SUBJECT PROPERTY are set forth in the  
6 lease agreement and are contractual in nature. BOLTHOUSE  
7 PROPERTIES, LLC does not lease any property from BLUM, and does  
8 not have any leasehold or contractual water rights relationship  
9 with BLUM.

10          93. 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          94. 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          95. 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          96. 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           97. 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           98. 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           99. 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          100. 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          101. 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          102. 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.

25          103. Objection. This interrogatory is vague, ambiguous,  
26 overbroad, not reasonably calculated to lead to the discovery of

1 admissible evidence, calls for the disclosure of private or  
2 proprietary corporate information/documents.

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

10 105. Objection. This interrogatory is vague, ambiguous,  
11 assumes facts and is overbroad. Notwithstanding the foregoing  
12 objections, and reserving same, see response to Special  
13 Interrogatory No. 104.

14 106. Objection. This interrogatory is vague, ambiguous,  
15 assumes facts and is overbroad. Notwithstanding the foregoing  
16 objections, and reserving same, see response to Special  
17 Interrogatory No. 104.

18 107. Objection. This interrogatory is vague, ambiguous,  
19 premature and overbroad. Notwithstanding the foregoing  
20 objections, and reserving same, WM. BOLTHOUSE FARMS, INC. is a  
21 lessee of the SUBJECT PROPERTY. WM. BOLTHOUSE FARMS, INC. lease  
22 water rights regarding the SUBJECT PROPERTY are set forth in the  
23 lease agreement and are contractual in nature. BOLTHOUSE  
24 PROPERTIES, LLC does not lease any property from BLUM, and does  
25 not have any leasehold or contractual water rights relationship  
26 with BLUM.

1           108. Objection. This interrogatory is vague, ambiguous,  
2 overbroad and directed to the wrong party.

3           109. Objection. This interrogatory is vague, ambiguous,  
4 premature and overbroad. Notwithstanding the foregoing  
5 objections, and reserving same, WM. BOLTHOUSE FARMS, INC. is a  
6 lessee of the SUBJECT PROPERTY. WM. BOLTHOUSE FARMS, INC. lease  
7 water rights regarding the SUBJECT PROPERTY are set forth in the  
8 lease agreement and are contractual in nature. BOLTHOUSE  
9 PROPERTIES, LLC does not lease any property from BLUM, and does  
10 not have any leasehold or contractual water rights relationship  
11 with BLUM.

12           110. Objection. This interrogatory is vague, ambiguous,  
13 overbroad and directed to the wrong party.

14           111. 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           112. 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           113. 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           114. Objection. This interrogatory is vague, ambiguous,  
2 overbroad, calls for a legal conclusion and assumes facts.  
3 Notwithstanding the foregoing objections, and reserving same,  
4 responding party does not so contend.

5           115. Objection. This interrogatory is vague, ambiguous,  
6 overbroad, calls for a legal conclusion and assumes facts.  
7 Notwithstanding the foregoing objections, and reserving same, see  
8 response to Special Interrogatory No. 114.

9           116. Objection. This interrogatory is vague, ambiguous,  
10 overbroad, calls for a legal conclusion and assumes facts.  
11 Notwithstanding the foregoing objections, and reserving same, see  
12 response to Special Interrogatory No. 114.

13           117. 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. Notwithstanding the  
17 foregoing objections, and reserving same, responding party is not  
18 aware of any such communications.

19           118. 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.

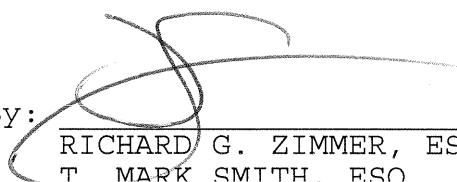
23           119. Objection. This interrogatory is vague, ambiguous,  
24 overbroad, not reasonably calculated to lead to the discovery of  
25 admissible evidence, calls for the disclosure of private or  
26 proprietary corporate information/documents.



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DATED: April 28, 2008

CLIFFORD & BROWN

By:   
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RICHARD G. ZIMMER, ESQ.  
T. MARK SMITH, ESQ.  
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Attorneys for  
BOLTHOUSE FARMS, INC. and  
BOLTHOUSE PROPERTIES, LLC

VERIFICATION TO FOLLOW

*Antelope Valley Groundwater Cases  
Judicial Counsel Coordination Proceeding No. 4408  
Santa Clara County Superior Court Case No. 1-05-CV-049053*

On January 25, 2008, I served the foregoing document(s) entitled:

*Nanette Maxey*  
NANETTE MAXEY  
2450-37