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

8 SUPERIOR COURT OF CALIFORNIA

9 COUNTY OF SANTA CLARA

10 * * *

11	COORDINATION PROCEEDING)	Judicial Council Coordination
12	SPECIAL TITLE (Rule 1550(b)))	Proceeding No. 4408
13	ANTELOPE VALLEY GROUNDWATER)	CASE NO. 1-05-CV-049053
14	CASES)	
15	INCLUDED ACTIONS:)	
16	LOS ANGELES COUNTY WATERWORKS)	BOLTHOUSE PROPERTIES, LLC'S
17	DISTRICT NO. 40 v. DIAMOND)	RESPONSE TO REQUEST FOR
18	FARMING COMPANY, et al.,)	PRODUCTION, SET ONE
19	Los Angeles Superior Court)	
20	Case No. BC325201)	
21	LOS ANGELES COUNTY WATERWORKS)	
22	DISTRICT NO. 40 v. DIAMOND)	
23	FARMING COMPANY, et al.,)	
24	Kern County Superior Court)	
25	Case No. S-1500-CV-254348)	
26	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, Request
3 for Production 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 a Request.

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

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

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

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

17 RESPONSES

18 1. Objection. This interrogatory is premature.
19 Notwithstanding the foregoing objections, and reserving same, see
20 response to Special Interrogatory No. 1.

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

24 3. Objection. This request is premature. Notwithstanding
25 the foregoing objections, and reserving same, see response to
26 Special Interrogatory No. 7.

1 4. Objection. This request is premature. Notwithstanding
2 the foregoing objections, and reserving same, see response to
3 Special Interrogatory No. 10.

4 5. Objection. This request is premature. Notwithstanding
5 the foregoing objections, and reserving same, see response to
6 Special Interrogatory No. 13.

7 6. Objection. This request is premature. Notwithstanding
8 the foregoing objections, and reserving same, see response to
9 Special Interrogatory No. 16.

10 7. Objection. This request is premature. Notwithstanding
11 the foregoing objections, and reserving same, see response to
12 Special Interrogatory No. 19.

13 8. Objection. This request is premature. Notwithstanding
14 the foregoing objections, and reserving same, see response to
15 Special Interrogatory No. 22.

16 9. Objection. This request is premature. Notwithstanding
17 the foregoing objections, and reserving same, see response to
18 Special Interrogatory No. 25.

19 10. Objection. This request is vague, ambiguous, premature
20 and overbroad. Notwithstanding the foregoing objections, and
21 reserving same, see response to Special Interrogatory No. 28.

22 11. Objection. This request is vague, ambiguous, premature
23 and overbroad. Notwithstanding the foregoing objections, and
24 reserving same, see response to Special Interrogatory No. 31.

25 12.

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1 13. Objection. This request is vague, ambiguous and
2 overbroad. Notwithstanding the foregoing objections, and
3 reserving same, see response to Special Interrogatory No. 37.

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

7 15. Objection. This request is vague, ambiguous, assumes
8 facts and is overbroad. Notwithstanding the foregoing
9 objections, and reserving same, see response to Special
10 Interrogatory No. 43.

11 16. Objection. This request 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 17. 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 18. Objection. This request is vague, ambiguous, assumes
20 facts and is overbroad. Notwithstanding the foregoing
21 objections, and reserving same, see response to Special
22 Interrogatory No. 53.

23 19. Objection. This request is vague, ambiguous, assumes
24 facts and is overbroad. Notwithstanding the foregoing
25 objections, and reserving same, see response to Special
26 Interrogatory No. 59.

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

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

7 22. Objection.

8 23. Objection. This request 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 and
12 directed to the wrong party.

13 24. Objection. This request is vague, ambiguous,
14 overbroad, assumes facts and directed to the wrong party.

15 25. Objection. This request 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 26. Objection. This request 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 27. Objection. This request is vague, ambiguous,
24 overbroad, not reasonably calculated to lead to the discovery of
25 admissible evidence and calls for a legal conclusion.

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1 28. Objection. This request is vague, ambiguous,
2 overbroad, not reasonably calculated to lead to the discovery of
3 admissible evidence, calls for a legal conclusion, unintelligible
4 and calls for information equally available to requesting party
5 via court records.

6 29. Objection. This request 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 30. Objection. This request 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 31. Objection. This request 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 32. Objection. This request is vague, ambiguous, assumes
19 facts and is overbroad. Notwithstanding the foregoing
20 objections, and reserving same, see response to Special
21 Interrogatory No. 104.

22 33. Objection. This request 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 34. Objection. This request is vague, ambiguous,
2 overbroad, calls for a legal conclusion and assumes facts.
3 Notwithstanding the foregoing objections, and reserving same, see
4 response to Special Interrogatory No. 114.

5 35. Objection. This request 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 36. Objection. This request is vague, ambiguous,
10 overbroad, assumes facts and directed to the wrong party.

11 37. Objection. This request is vague, ambiguous,
12 overbroad, assumes facts and directed to the wrong party.

13 38. Objection. This request is vague, ambiguous,
14 overbroad, assumes facts and directed to the wrong party.

15 39. Objection. This request is vague, ambiguous,
16 overbroad, assumes facts and directed to the wrong party.

17 40. Objection. This request 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. Notwithstanding the
21 foregoing objections, and reserving same, responding party is not
22 in possession of responsive documents.

23 41. Objection. This request is vague, ambiguous,
24 overbroad, assumes facts and directed to the wrong party.

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1 42. Objection. This request 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 43. Objection. This request 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 44. Objection. This request 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 45. Objection. This request is vague, ambiguous,
14 overbroad, assumes facts and directed to the wrong party.

15 DATED: April 28, 2008

16 CLIFFORD & BROWN

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19 By: 

RICHARD G. ZIMMER, ESQ.
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JEREMY J. SCHROEDER, ESQ.
Attorneys for
BOLTHOUSE FARMS, INC. and
BOLTHOUSE PROPERTIES, LLC

VERIFICATION TO FOLLOW

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Santa Clara County Superior Court Case No. 1-05-CV-049053

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

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