

EXHIBIT F

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8 SUPERIOR COURT OF CALIFORNIA
9 COUNTY OF LOS ANGELES - CENTRAL DISTRICT
10

11 COORDINATION PROCEEDINGS
SPECIAL TITLE (Rule 1550(b))

Judicial Council Coordination Proceeding
No. 4408

12 ANTELOPE VALLEY GROUNDWATER
13 CASES

CASE NO. 1-05-cv-049053

14 INCLUDED ACTIONS:

**RESPONSE OF PARTY LESLIE
PROPERTY TO REQUEST FOR
ADMISSIONS, SET ONE DEMANDED
BY PARTY WM. BOLTHOUSE
FARMS, INC.**

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

[Phase 6 Trial]

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

Trial Date: August 11, 2014
Time: 9:00 a.m.
Dept: Old Dept. 1, Los Angeles

20 DIAMOND FARMING COMPANY, and
21 WM. BOLTHOUSE FARMS, INC. v. CITY
OF LANCASTER, et al.
22 Riverside Superior Court Case No. RIC
344436 [c/w case no. RIC 344668 and 353840]
23

24 AND RELATED ACTIONS.
25

26 DEMANDING PARTY: WM. BOLTHOUSE FARMS, INC. ("BOLTHOUSE")

27 RESPONDING PARTY: LESLIE PROPERTY

28 SET NO.: ONE

1 The "Leslie Property" is 104 acres located at the intersection of 238th Street and
2 Avenue X in the Antelope Valley, APN 3088-001-005 and is owned by the Roman Catholic
3 Archdiocese of Los Angeles. The "Leslie Property" hereby responds to the Request for
4 Admissions demanded by party "Bolthouse" as follows:

5 **REQUEST FOR ADMISSION NO. 1:**

6 YOU have not acquired any prescriptive rights as against BOLTHOUSE.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 1:**

8 Admit.

9 **REQUEST FOR ADMISSION NO. 2:**

10 YOU have not alleged or will not make any prescriptive claims against any real property
11 owned by BOLTHOUSE.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 2:**

13 Admit.

14 **REQUEST FOR ADMISSION NO. 3:**

15 YOU have not acquired any prescriptive rights against any real property owned by
16 BOLTHOUSE.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 3:**

18 Admit.

19 **REQUEST FOR ADMISSION NOS. 4 THROUGH 14:**

20 **RESPONSE TO REQUEST FOR ADMISSION NOS. 4 THROUGH 14:**

21 No response required.

22 **REQUEST FOR ADMISSION NO. 15:**

23 YOUR wells are down-gradient of BOLTHOUSE's wells.

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 15:**

25 Leslie Property has no wells either in the past or presently, so Leslie Property can neither
26 admit nor deny Request for Admission No. 15.

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1 **REQUEST FOR ADMISSION NO. 16:**

2 YOUR pumping of groundwater has never had an impact on groundwater levels in any
3 well owned by BOLTHOUSE.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 16:**

5 Leslie Property has not in the past nor presently pumps groundwater, so Leslie Property
6 can neither admit nor deny Request for Admission No. 16.

7 **REQUEST FOR ADMISSION NO. 17:**

8 YOUR pumping of groundwater has never interfered with BOLTHOUSE's exercise of its
9 groundwater rights.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 17:**

11 Leslie Property has not in the past nor presently pumps groundwater, so Leslie Property
12 can neither admit nor deny Request for Admission No. 17.

13 **REQUEST FOR ADMISSION NO. 18:**

14 Operation of YOUR wells has never interfered with operation of BOLTHOUSE's wells.

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 18:**

16 Leslie Property has no wells either in the past or presently, so Leslie Property can neither
17 admit nor deny Request for Admission No. 18.

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19 Dated: January 31, 2014

Carlsmith Ball LLP

20
21 By 

Allan J. Graf
Attorneys for Party
"LESLIE PROPERTY"

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VERIFICATION

I, Michael Davitt, am the Director of Real Estate for the Roman Catholic Archdiocese of Los Angeles. The Roman Catholic Archdiocese of Los Angeles is the owner of the Leslie Property, a party to this action, and I am authorized to make this Verification on its behalf.

I have read the foregoing RESPONSE OF PARTY LESLIE PROPERTY TO REQUEST FOR ADMISSIONS, SET ONE DEMANDED BY PARTY WM. BOLTHOUSE FARMS, INC., and know the contents thereof. I am informed and believe that the matters stated therein are true and on that ground certify or declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed at Los Angeles, California on January 31, 2014.



Michael Davitt