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EXEMPT FROM FILING FEES  
UNDER GOVERNMENT CODE  
SECTION 6103

Attorneys for Cross-Defendants County Sanitation Districts Nos. 14 and 20 of Los Angeles  
County

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES – CENTRAL DISTRICT

**ANTELOPE VALLEY  
GROUNDWATER CASES**

Included Actions:

Los Angeles County Waterworks District  
No. 40 v. Diamond Farming Co.  
Superior Court of California, County of  
Los Angeles, Case No. BC 325 201

Los Angeles County Waterworks District  
No. 40 v. Diamond Farming Co.  
Superior Court of California, County of  
Kern, Case No. S-1500-CV-254-348

Wm. Bolthouse Farms, Inc. v. City of  
Lancaster, Diamond Farming Co. v. City  
of Lancaster, Diamond Farming Co. v.  
Palmdale Water Dist., Superior Court of  
California, County of Riverside,  
consolidated actions, Case Nos. RIC 353  
840, RIC 344 436, RIC 344 668

Judicial Council Coordination No. 4408

CLASS ACTION

Santa Clara Case No.: 1-05-CV-049053

ASSIGNED FOR ALL PURPOSES TO:  
Judge: Honorable Jack Komar

OBJECTIONS TO BOLTHOUSE RE-NOTICE  
OF DEPOSITION OF EXPERT WITNESS  
PETER LEFFLER AND REQUEST FOR  
PRODUCTION OF DOCUMENTS

Date: October 22, 2010

Time: 10:00 a.m.

Place: Ramada Inn - Burbank  
2900 N. San Fernando Blvd.  
Burbank, California 91504

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that COUNTY SANITATION DISTRICTS NOS. 14 AND 20  
OF LOS ANGELES COUNTY (“Cross-Defendants”) object to Bolthouse Properties, LLC and

1 Wm. Bolthouse Farms Re-Notice of Deposition of Expert Witness Peter Leffler and Request for  
2 Production of Documents ("Deposition Notice"), as follows:

3 Cross-Defendants object to the Deposition Notice on the grounds that it calls for  
4 information outside the scope of the expert designation. Mr. Leffler has been designated by the  
5 Public Water Suppliers for the limited purpose of providing expert testimony and rebuttal  
6 testimony regarding characteristics of bedrock surrounding the Antelope Valley and potential  
7 flows of groundwater through those materials into the Basin. Nothing in this objection, however,  
8 limits the breadth or scope of future designation of this expert by Cross-Defendants, should this  
9 designation be made.

#### 10 SPECIFIC OBJECTIONS

11 1. Cross-Defendants object to this document request to the extent it is outside the scope of  
12 the expert designation and calls for information protected by the attorney work product doctrine.

13 2. Cross-Defendants object to this document request to the extent it is outside the scope of  
14 the expert designation and calls for information protected by the attorney work product doctrine.

15 3. Cross-Defendants object to this document request to the extent it is outside the scope of  
16 the expert designation and calls for information protected by the attorney work product doctrine.

17 4. Cross-Defendants object to this document request to the extent it is outside the scope of  
18 the expert designation and calls for information protected by the attorney work product doctrine.

19 5. Cross-Defendants object to this document request to the extent it is outside the scope of  
20 the expert designation and calls for information protected by the attorney work product doctrine.

21 6. Cross-Defendants object to this document request to the extent it is outside the scope of  
22 the expert designation and calls for information protected by the attorney work product doctrine.

23 7. Cross-Defendants object to this document request to the extent it is outside the scope of  
24 the expert designation and calls for information protected by the attorney work product doctrine.

25 8. Cross-Defendants object to this document request to the extent it is outside the scope of  
26 the expert designation and calls for information protected by the attorney work product doctrine.

27 9. Cross-Defendants object to this document request to the extent it is outside the scope of  
28 the expert designation and calls for information protected by the attorney work product doctrine.

1 11. Cross-Defendants object to this document request to the extent it is outside the scope of  
2 the expert designation and calls for information protected by the attorney work product doctrine.

3 12. Cross-Defendants object to this document request to the extent it is outside the scope of  
4 the expert designation and calls for information protected by the attorney work product doctrine.

5 13. Cross-Defendants object to this document request to the extent it is outside the scope of  
6 the expert designation and calls for information protected by the attorney work product doctrine.

7 15. Cross-Defendants object to this document request to the extent it is outside the scope of  
8 the expert designation and calls for information protected by the attorney work product doctrine.

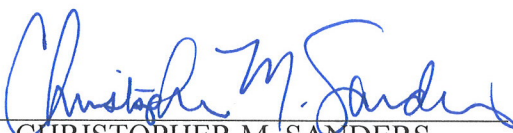
9 17. Cross-Defendants object to this document request to the extent it is outside the scope of  
10 the expert designation and calls for information protected by the attorney work product doctrine.

11 18. Cross-Defendants object to this document request to the extent it is outside the scope of  
12 the expert designation and calls for information protected by the attorney work product doctrine.

13 19. Cross-Defendants object to this document request to the extent it is outside the scope of  
14 the expert designation and calls for information protected by the attorney work product doctrine.

15  
16 Dated: October 11, 2010

ELLISON, SCHNEIDER & HARRIS L.L.P.

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19 By:   
20 CHRISTOPHER M. SANDERS  
21 Attorneys for Cross-Defendants  
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I am employed in the County of Sacramento, State of California. I am over the age of eighteen years and am not a party to the within action. My business address is ELLISON, SCHNEIDER & HARRIS, L.L.P.; 2600 Capitol Avenue, Suite 400; Sacramento, California 95816; telephone (916) 447-2166.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on October 11, 2010, at Sacramento, California.

Patty Slomski