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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 TAKING AND
VIDEOTAPING DEPOSITION OF LOS
ANGELES COUNTY WATERWORKS NO.
40's EXPERT, PETER LEFFLER**

Phase 3 Trial Date: January 4, 2011

Date: November 19, 2010
Time: 9:00 a.m.
Place: Lagerlof, Senecal, et al., LLP
301 North Lake Avenue, 10th Floor
Pasadena, California 91101

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 Taking and Videotaping Deposition of Los Angeles County
2 Waterworks No. 40's Expert, Peter Leffler as follows:

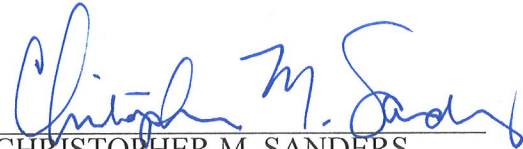
3 Cross-Defendants object to the Deposition Notice on the grounds that it calls for
4 information outside the scope of the expert designation. Mr. Leffler has been designated by the
5 Public Water Suppliers for the limited purpose of providing expert testimony and rebuttal
6 testimony regarding characteristics 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 document request Nos. 1-9 and Nos. 11-35 to the extent they
12 are outside the scope of the expert designation and call for information protected by the attorney
13 work product doctrine.

14 Dated: October 18, 2010

ELLISON, SCHNEIDER & HARRIS L.L.P.

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17 By: 
18 CHRISTOPHER M. SANDERS
19 Attorneys for Cross-Defendants
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1 **PROOF OF SERVICE**

2 I declare that:

3 I am employed in the County of Sacramento, State of California. I am over the age of
4 eighteen years and am not a party to the within action. My business address is ELLISON,
5 SCHNEIDER & HARRIS, L.L.P.; 2600 Capitol Avenue, Suite 400; Sacramento, California
6 95816; telephone (916) 447-2166.

7 On October 18, 2010, I served the County Sanitation Districts' *OBJECTIONS TO*
8 *BOLTHOUSE RE-NOTICE OF TAKING AND VIDEOTAPING DEPOSITION OF LOS*
9 *ANGELES COUNTY WATERWORKS NO. 40's EXPERT, PETER LEFFLER* by electronic
10 posting to the Santa Clara Superior Court E-Filing website,
11 <http://www.scefiling.org/cases/casehome.jsp?caseId=19>.

12 I declare under penalty of perjury that the foregoing is true and correct and that this
13 declaration was executed on October 18, 2010, at Sacramento, California.

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15 _____
16 Patty Slomski
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