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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

10 ANTELOPE VALLEY) Judicial Council Coordination Proceeding No.
11 GROUNDWATER CASES) 4408
12 Included Actions:)
13 Los Angeles County Waterworks District No. 40) Assigned to The Honorable Jack Komar
14 v. Diamond Farming Co., Superior Court of)
15 California, County of Los Angeles, Case No. BC) STIPULATION AND PROTECTIVE ORDER
16 325 201; Los Angeles County Waterworks) RE CONFIDENTIALITY OF SETTLEMENT
17 District No. 40 v. Diamond Farming Co., Superior) DISCUSSIONS
18 Court of California, County of Kern, Case No. S-)
19 1500-CV-254-348; Wm. Bolthouse Farms, Inc.)
20 v. City of Lancaster, Diamond Farming Co. v.)
21 City of Lancaster, Diamond Farming Co. v.)
22 Palmdale Water Dist., Superior Court of)
23 California, County of Riverside, Case Nos. RIC)
24 353840, RIC 344436, RIC 344668)

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RECITALS

A. Many parties have retained or will retain attorneys and expert consultants in these coordinated actions known as the "Antelope Valley Groundwater Cases."

B. Many parties wish to conduct settlement discussions and negotiations to understand and attempt to resolve hydrogeological, legal, and other issues.

C. In order to promote candor and flexibility in these discussions, all such settlement communications should be non-discoverable, inadmissible in evidence, and not waive any privilege or other legal protection.

D. The Court has the power to issue this protective order pursuant to CCP §§ 2019.030 and 2017.020, Evidence Code §§ 1152 and 352.

1 NOW, THEREFORE, the undersigned parties agree as follows:

2 1. Participation by attorneys, parties, or expert consultants in meetings,
3 correspondence, or discussions in which they attempt to settle or resolve any factual or legal issue
4 ("settlement communications"), including disclosures of material or information protected by the
5 attorney-client privilege or work product protection, shall not waive any privilege, work product
6 protection, or other legal protection.

7 2. Any oral or written communication made in the course of such settlement
8 communications shall: (a) be inadmissible for any purpose in the litigation, (b) shall not be discoverable
9 by any means, and (c) shall be subject to all protections and privileges accorded settlement discussions
10 by California law. However, if a document or other piece of evidence that would otherwise be
11 discoverable or admissible is exchanged in the course of such settlement communications, such evidence
12 shall remain discoverable and/or admissible.

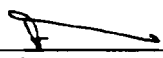
13 3. The parties are advised to mark or identify those writings that are protected by
14 this stipulation/protective order with an identifying legend such as: "CONFIDENTIAL SETTLEMENT
15 COMMUNICATION".

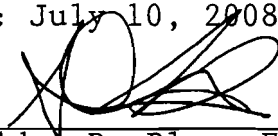
16 4. Participation by an expert in settlement communications shall not constitute
17 designation of that expert under CCP § 2034, et seq. No expert witness who testifies in this case shall
18 rely or base his/her opinion on any opinion or other communication received from another party's expert
19 or attorney in the course of settlement communications.

20 5. This stipulation may be signed in counterparts. If approved by the Court, this
21 protective order shall be binding on all current and future parties to these cases. This stipulation/order
22 shall be effective from March 24, 2006 until terminated by the Court.

23 NOSSAMAN, GUTHNER, KNOX
24 & ELLIOTT, LLP

Law Firm:
LAW OFFICES OF SHELDON R. BLUM
Date: July 10, 2008


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26 By:  _____
27 Fred Fudacz
28 Attorneys for Tejon Ranchcorp

By:  _____
Sheldon R. Blum, Esq.
Attorney for Sheldon R. Blum
Trustee For The Sheldon R.
Blum Trust; & Individually

PROTECTIVE ORDER

Good cause appearing therefore, it is so ORDERED.

Date: **AUG 11 2008**


The Honorable Jack Komar
Judge of the Superior Court