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**Attorney for BLUM TRUST**

**IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
IN AND FOR THE COUNTY OF LOS ANGELES**

Coordinated Proceedings  
Special Title {Rule 1550 (b)}

Judicial Council Coordination Proceeding  
No. 4408

**ANTELOPE VALLEY GROUNDWATER  
CASES**

Santa Clara Case No. 1-05-CV-049053  
Assigned to Hon. Jack Komar

Included Actions:

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

**BLUM TRUST'S NOTICE TO WM. BOLTHOUSE  
FARMS, INC'S MANAGERIAL EMPLOYEES TO  
APPEAR & PRODUCE DOCUMENTS AT PHASE  
4 TRIAL**

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

Trial Date: May 28, 2013  
Time: 9:00 a.m.  
Dept. No.: TBA  
Judge: Hon. Jack Komar

Wm. Bolthouse Farms, Inc., v. City of  
Lancaster; Diamond Farming Co. v. City of  
Lancaster; Diamond Farming Co. v. City of  
Palmdate Water District.

Riverside County Superior Court  
Consolidated Action Nos. RIC 344 840,  
RIC 344 436, RIC 344 668  
Defendants.

PLEASE TAKE NOTICE that pursuant to *Code of Civil Procedure §1987(b)*, the BLUM  
TRUST requests the attendance at trial of WM. BOLTHOUSE FARMS, INC, Managerial Employees

1 namely, Mr. Michael Kovacevich, Ag. Properties Manager; Mr. Darren Filkens, Director of Farming  
2 Operations; Steve Rodrigues, Lancaster Ranch Manager; and Daniel Wilke, Irrigation Department  
3 Manager and testify regarding the volume of groundwater delivered onto the BLUM TRUST leased  
4 parcels to irrigate and harvest its crops from January 1, 2002, up through December 31, 2009,  
5 including the identify and location of the water wells from which the groundwater was pumped and  
6 produce the documents identified below.  
7

8 The trial at which appearance is requested is scheduled to begin on May 28, 2013, however  
9 the trial court has not decided on the order of witnesses. Request is made that the witnesses be  
10 available for the trial subject to setting the date of appearance based upon further clarifying court  
11 orders regarding the order of trial. Arraignments may be made with the noticing party's attorney to  
12 be "On Call". The place of attendance at trial is the Los Angeles County Superior Court located at  
13 111 N. Hill Street, Los Angeles, CA 90012 or such other location pursuant to court order.  
14

15 PLEASE TAKE FURTHER NOTICE that pursuant to *Code of Civil Procedure §1987(c)*,  
16 Blum Trust requests that the above-identified Managerial Employees of WM. BOLTHOUSE FARMS,  
17 INC, produce the following identified documents:

18 1. All "WRITINGS" as defined by *Evidence Code §250*, which establishes the volume of  
19 groundwater pumped onto the BLUM TRUST leased parcels to irrigate WM. BOLTHOUSE FARMS,  
20 INC's crops from January 1, 2002, up through December 31, 2009, including the identity and location  
21 of the water wells from which the groundwater was delivered.

22 Dated: May 13, 2013

Law Offices of Sheldon R. Blum

23  
24 By: 

Sheldon R. Blum Attorney For BLUM TRUST