

**LAW OFFICES OF
SHELDON R. BLUM**

2242 CAMDEN AVENUE, SUITE 201
SAN JOSE, CALIFORNIA 95124
TEL: (408) 377-7320
FAX: (408) 377-2199
STATE BAR NO. 83304

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 EXHIBIT LIST FOR MOTION
FOR SUMMARY JUDGMENT/SUMMARY
ADJUDICATION OF ISSUES**

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

Hearing Date: December 22, 2014
Time: 10:00 a.m.
Dept. No.: TBD
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.

TO ALL PARTIES AND TO THEIR RESPECTIVE ATTORNEYS OF RECORD:

Cross-Defendant BLUM TRUST hereby submits the following Exhibit List for consideration in conjunction with BLUM TRUST's Motion for Summary Judgment/Summary of Issues:

<u>DESCRIPTION OF DOCUMENT</u>	<u>EXHIBIT NO.</u>
1. Agriculture Lease Agreement between BLUM TRUST & BOLTHOUSE FARMS dated August 2, 2001 with attached Plot Map & Legal Description with Modification of Lease Agreement dated May 12, 2004. (Excerpts)	"1"
2. BOLTHOUSE FARMS' "MAP Of BLUM PARCEL" illustrating 3 water wells.	"2"
3. BOLTHOUSE FARMS' counsel Mr. Richard Zimmer's email to BLUM TRUST's counsel Mr. Sheldon R. Blum dated November 31, 2011.	"3"
4. BOLTHOUSE FARMS Ag. Properties/Legal Manager Michael W. Kovacevich email to BLUM TRUST's counsel Mr. Sheldon R. Blum dated November 16, 2009, with attached BLUM-MAP dated November 11, 2009.	"4"
5. Deposition excerpts of BOLTHOUSE FARMS' 'Person Most Knowledgeable' Irrigation Equipment Manager Daniel Wilke taken on February 6, 2013.	"5"
6. Ariel view photographs of BLUM TRUST's farmland at Ave. J & 70-75 St. E. and of BLUM TRUST's 3 water wells in relation to BOLTHOUSE FARMS' AVOL 14-3N; AVOL 14-3S & LAID 13-3 water wells, Lancaster, CA.	"6"
7. Photographs of BLUM TRUST's farmland depicting crops irrigated on the BLUM TRUST leased farmland taken by Mr. Blum on May 18, 2003.	"7(1-3)"
8. Photographs of BOLTHOUSE FARMS' pipeline delivery system routed onto BLUM TRUST's leased parcels underneath 70 th St. E., taken by Mr. Blum on August 2, 2007.	"8(1-7)"
9. BLUM TRUST's First Set of Special Interrogatories, Set One, to BOLTHOUSE PROPERTIES Interr. No. 92, dated February 19, 2008; & BOLTHOUSE PROPERTIES Response dated April 28, 2008, verified by President Anthony L. Leggio dated May 9, 2008.	"9(1-2)"
10. Settlement Agreement (excerpts) between Plaintiff BLUM TRUST and Defendants BOLTHOUSE FARMS & BOLTHOUSE PROPERTIES dated December 16, 2008.	"10"
11. BLUM TRUST photographs depicting an uncapped water well taken on August 2, 2007, and subsequently capped without welding the same, together with 2 additional water wells capped without welding its opening, taken by BOLTHOUSE	"11"

1 FARMS/Clifford Brown on or about October, 2007.

2 Dated: October 5, 2014

Law Offices of Sheldon R. Blum

3
4 By: 

Sheldon R. Blum, Esq.

Attorney For BLUM TRUST