

EXHIBIT “D”

1 **RICHARD G. ZIMMER - SBN 107263**

2 **T. MARK SMITH - SBN 162370**

3 **CLIFFORD & BROWN**

4 **A Professional Corporation**

5 **Attorneys at Law**

6 **Bank of America Building**

7 **1430 Truxtun Avenue, Suite 900**

8 **Bakersfield, CA 93301-5230**

9 **(661) 322-6023**

10 **Attorneys for Bolthouse Properties, LLC and**
11 **Wm. Bolthouse Farms, Inc.,**

12 **SUPERIOR COURT OF CALIFORNIA**

13 **COUNTY OF SANTA CLARA**

14 *** * ***

15 **COORDINATION PROCEEDING**

16 **SPECIAL TITLE (Rule 1550(b))**

) **Judicial Council Coordination Proceeding**

) **No. 4408**

)

17 **ANTELOPE VALLEY GROUNDWATER**
18 **CASES**

) **CASE NO. 1-05-CV-409053**

) **Trial Date: 02/11/13**

)

19 **INCLUDED ACTIONS:**

)

)

20 **LOS ANGELES COUNTY**
21 **WATERWORKS DISTRICT NO. 40 v.**
22 **DIAMOND FARMING COMPANY, et al.,**
23 **Los Angeles Superior Court Case No.**
24 **BC325201**

)

)

)

)

)

)

25 **LOS ANGELES COUNTY**
26 **WATERWORKS DISTRICT NO. 40 v.**
27 **DIAMOND FARMING COMPANY, et al.,**
28 **Kern County Superior Court Case No. S-**
1500-CV-254348

)

)

)

)

)

)

29 **DIAMOND FARMING COMPANY, and**
30 **W.M. BOLTHOUSE FARMS, INC., v.**
31 **CITY OF LANCASTER, et al.,**
32 **Riverside Superior Court**
33 **Case No. RIC 344436 [c/w case no. RIC**
34 **344668 and 353840]**

)

)

)

)

)

)

)

)

ADDENDUM EXHIBITS A, B, C
AMENDED MAY 8, 2013, EXHIBITS P-1
AND P-2 TO DECLARATION OF
ANTHONY L. LEGGIO IN LIEU OF
DEPOSITION TESTIMONY FOR
PHASE 4 TRIAL

1 Bolthouse Properties, LLC hereby submits Exhibit A amended May 8, 2013, Exhibit B
2 amended May 8, 2013, and Exhibit C amended May 8, 2013 superseding Exhibits A, B, and C
3 previously provided in the Declaration of Anthony L. Leggio in Lieu of Deposition Testimony
4 for Phase 4 Trial.

5 In addition, Bolthouse Properties, LLC hereby submits Exhibits P-1 and P-2. These
6 exhibits are in response to inquiries made at the deposition of Anthony L. Leggio on April 23,
7 2013.

8 I declare under penalty of perjury under the laws of the State of California that the
9 foregoing is true and correct. Executed this 13th day of May, 2013, at Bakersfield, California.

10
11 By:

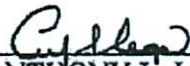

12 ANTHONY L. LEGGIO
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT P-1

To Addendum Exhibits A, B, C Amended May 8, 2013,
Exhibits P-1 and P-2 to Declaration of Anthony L. Leggio
In Lieu of Deposition Testimony for Phase 4 Trial

Bolthouse Properties, LLC

Exhibit P-1

Crop Rotation

<u>FIELDS</u>	<u>ACRES</u>	<u>2005</u>	<u>2004</u>	<u>2003</u>	<u>2002</u>	<u>2001</u>
KASTNER 28-2	21	fallow	onions	carrots	fallow	fallow
PARDEE 28-3	82	carrots	TR/potatoes	onions	carrots	onions
PARDEE 28-4	83	carrots	TR/potatoes	onions	carrots	wheat
PARDEE 30-3	36	onions	carrots	onions	carrots	carrots
CHING 21-3	61	carrots	onions	carrots	potatoes	fallow
PIANE 21-4	71	fallow	TR/H2O	wheat/potatoes	carrots	onions
BUSHNEIL 10-3	71	onions	carrots	fallow	carrots	wheat
BUSHNEIL 10-4 E	70	carrots	TR/H2O	fallow	carrots	wheat
BUSHNEIL 10-4 W	99	onions	onions/fallow	carrots	silage	carrots
BUSHNEIL 15-2	34	carrots	fallow	fallow	fallow	fallow
WOLSKY 10-4	38	onions	onions	carrots	carrots	fallow
AVOL 14-3	73	onions	carrots	onions	carrots	potatoes
GORREZ 14-4	20	onions	carrots	sesbania	fallow	fallow
COOPER 14-4	21	onions	carrots	sesbania	fallow	fallow
✓ BLUM 24-1	118	onions	onions	carrots	carrots	fallow
LAUTERBURN 24-2	40	onions	onions	carrots	carrots	fallow
AVOL 23-2	78	carrots	onions	onions	carrots	carrots
AVOL 25-2	50	onions	carrots	onions	carrots	fallow
STEHR 20-2	22	onions	carrots	onions	fallow	fallow
OWENS 25-1	22	onions	carrots	onions	carrots	fallow
AVOL 25-3	77	onions	carrots	onions	carrots	fallow
CAMPBELL 25-4	11	onions	carrots	sesbania	fallow	fallow
AVOL 21-1	119	carrots	potatoes	sesbania/carrots	carrots	fallow
LRC 21-2	72	carrots	potatoes	sesbania/onions	carrots	carrots
MINN 21-3	155	fallow	onions/fallow	carrots	onions	carrots
MINN 21-4 E	65	fallow	carrots	onions	carrots	wheat
MINN 21-4 W	97	fallow	onions	carrots	onions	carrots
TAPIA 22-1	41	onions	carrots	onions	carrots	fallow
MINN 22-2	130	fallow	potatoes	carrots	onions	carrots
MINN 22-3 E	79	carrots	potatoes	onions	carrots	onions
MINN 22-3 W	77	carrots	fallow	wheat/potatoes	carrots	wheat
MINN 22-4	157	carrots	potatoes	onions	carrots	onions
MINN 23-1	52	fallow	onions	carrots	onions	carrots
MINN 23-3	110	onions	carrots	wheat/potatoes	carrots	onions
MINN 23-4	83	fallow	onions	carrots	onions	carrots

Bolthouse Properties, LLC

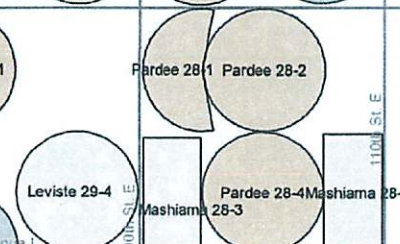
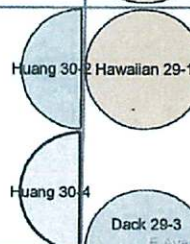
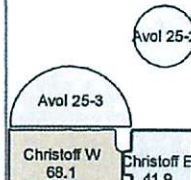
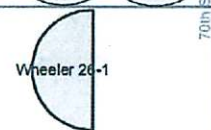
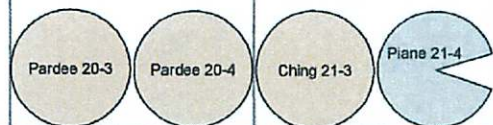
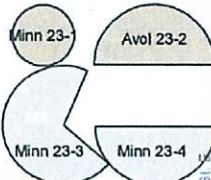
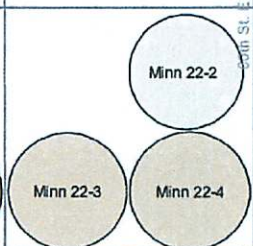
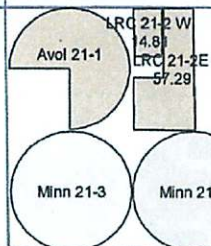
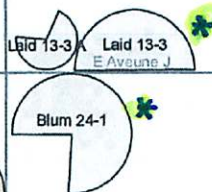
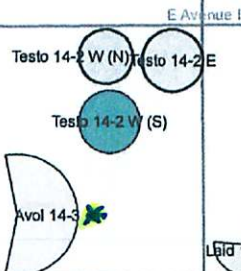
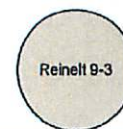
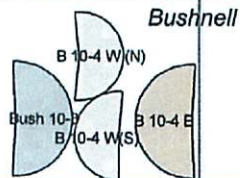
Exhibit P-1

Crop Rotation

FIELDS	ACRES	2012	2011	2010	2009	2008	2007	2006
Rowan 2-1	50	Barley	carrots	Barley	fallow	carrots	fallow	fallow
Rowan 2-2	75	Barley	carrots	Barley	fallow	carrots	fallow	fallow
Rowan 2-3	75	Barley	carrots	Barley	fallow	carrots	fallow	fallow
Rowan 2-4	75	carrots	Barley	Barley	carrots	fallow	carrots	fallow
Rowan 2-5	75	carrots	Barley	Barley	carrots	fallow	carrots	fallow
Rowan 2-6	40	Barley	Barley	carrots	fallow	fallow	carrots	fallow
Rowan 2-7	40	Barley	Barley	carrots	wheat	fallow	fallow	carrots
Rowan 2-8	75	Barley	Barley	carrots	wheat	fallow	fallow	carrots
Rowan 2-9	75	carrots/sudan	Barley	Barley	carrots	fallow	fallow	carrots
S & P 26-1	124	carrots/sudan	Barley	Barley	carrots	carrots	fallow	fallow
S & P 26-2	124	Barley	carrots	Barley	wheat	fallow	fallow	carrots
S & P 26-3	124	Barley	Barley	carrots	wheat	fallow	fallow	carrots
S & P 26-4	124	Barley	Barley	carrots	onions	fallow	carrots	fallow
S & P 27-4	80	carrots/sudan	Barley	Barley	carrots	carrots	fallow	fallow
S & P 35-1	124	Barley	carrots	Barley	fallow	carrots	fallow	fallow
S & P 35-2	124	Barley	carrots	Barley	fallow	fallow	carrots	fallow
S & P 35-3	120	carrots/sudan	Barley	Barley	carrots	fallow	fallow	carrots
S & P 35-4	120	Barley	Barley	carrots	fallow	fallow	carrots	fallow
AJAMIAN 27-4	28	carrots	Barley	Barley	carrots	onions	carrots	fallow
Back 32-2	123	Barley	carrots	Barley	onions	Sod/Carr.	Sod	carrots
Big Field 33-1	123	Barley	carrots	Barley	fallow	carrots	Sod	fallow
Big Field 33-1 A	15	Barley	carrots	Barley	onions	carrots	fallow	fallow
Desert 34-1	123	carrots	Barley	Barley	carrots	onions	carrots	fallow
Yard 33-2	92	carrots	Barley	Barley	carrots	Mustard/Sod	Sod	carrots
Yard 33-2 A	20	carrots	Barley	Barley	carrots	onions	Sod	carrots
Anderson 5-2	122	carrots	Barley	Barley	carrots	Sod	Sod	carrots
Turner 5-1	44	Barley	Barley	carrots	onions	carrots	Onions	fallow
BROWN 34-3	109	Barley	Barley	carrots	wheat	Sod	carrots	fallow
BROWN 34-4	123	Barley	Barley	carrots	potatoes	carrots	onions	onion/fall
BALZER 29-3	62	Fallow	Fallow	Barley	carrots	onions	fallow	carrots
QUAN 32-4	92	Barley	carrots	Barley	wheat	carrots	onions	onions
SHTLER 28-4	124	Fallow	Fallow	carrots	Pot/wheat	onions	carrots	fallow
Mashiyama W	78				wheat	onions	onions	fallow
Mashiyama 28-4	62	Barley	Barley	carrots	onions	onions	fallow	fallow
DACK 29-3	64	carrots	Onions	onions	carrots	potatoes	carrots	fallow
TESTO 14-2 N	24	carrots	onions	Fallow	onions	fallow	fallow	fallow
TESTO 14-2 S	31	carrots	onions	Fallow	onions	fallow	fallow	fallow
TESTO 14-2 E	31	Carrots	Fallow	Fallow	fallow	fallow	fallow	fallow
HAWAIIAN 29-1	122	carrots	onions	onions	wheat	carrots	potatoes	carrots
HUANG 30-2	60	Barley	Barley	carrots	fallow	potatoes	carrots	onions
HUANG 30-4	60	Barley	Barley	carrots	wheat	fallow	carrots	onions
PARDEE 30-3	28	Barley	Barley	carrots	wheat	carrots	fallow	fallow
LAID 13-3	60	Barley	Barley	Barley	carrots	onions	potatoes	carrots
Laid 13-3 A	22	Barley	Barley	Barley	carrots	onions	potatoes	carrots
LEVISTE 29-4	124					onions	carrots	onions
REINELT 9-3	122		Car./Su.	potatoes	fallow	carrots	onions	onions
PARDEE 20-3	121	Barley	Barley	carrots	fallow	carrots	onions	potatoes
PARDEE 20-4	117	Barley	carrots	Barley	fallow	carrots	fallow	fallow
PARDEE 28-1	71	Barley	Barley	Barley	carrots	carrots	potatoes	carrots
PARDEE 28-2	126	Barley	Barley	Barley	carrots	carrots	potatoes	carrots
Pardee 28-4	126	Barley	carrots	potatoes	onions	carrots	fallow	fallow
CHING 21-3	122	Barley	carrots	Barley	onions	carrots	fallow	potatoes
PIANE 21-4	102	Barley	Barley	carrots	fallow	potatoes	carrots	fallow
AVOL 25-2	31	carrots	Barley	Barley	wheat	onions	carrots	fallow
AVOL 25-3	61	Barley	Barley	Barley	fallow	onions	carrots	fallow
BUSHNEIL 10-3	57	Barley	Barley	carrots	fallow	potatoes	carrots	fallow
BUSHNEIL 10-4 E	56	carrots	Barley	onions	onions	carrots	fallow	fallow
BUSHNEIL 10-4 N	36	carrots	Barley	Barley	carrots	onions	fallow	fallow
BUSHNEIL 10-4 S	34	Barley	Barley	carrots	wheat	onions	carrots	fallow
BUSHNEIL 15-2	29	carrots	Barley	onions	onions	carrots	fallow	fallow
AVOL 14-3	68	Barley	Barley	carrots	fallow	onions	carrots	fallow
BLUM 24-1	90				carrots	onions	carrots	fallow

EXHIBIT P-2

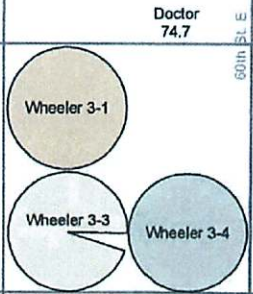
To Addendum Exhibits A, B, C Amended May 8, 2013,
Exhibits P-1 and P-2 to Declaration of Anthony L. Leggio
In Lieu of Deposition Testimony for Phase 4 Trial



Legend

Pivot_GIS
2008_Crop

- Carrots
- Fallow
- Onions
- Pot/Onion (62/62)
- Potatoes
- Safflower
- Sod
- Sod/Saff. (30/60)
- Sod/Saff. (70/45)
- Wheat

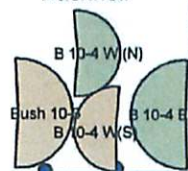


Wm. Bolthouse Farms, Inc.
Lancaster Farms
Minn & Pardee
2008 Crops





Bushnell

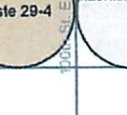
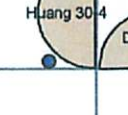
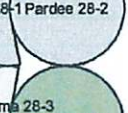
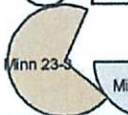
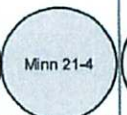
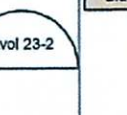
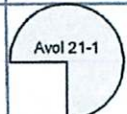
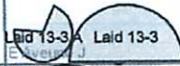


Reinelt 9-3

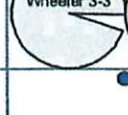
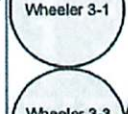
E Avenue I

Test 14-2 W(N)

Test 14-2 W(S)



50th St E



E Avenue M

80th St E

E Avenue N

110th St E

Legend

- Carrots 07
- Onions 07
- Wheat 07
- Wheat/Potatoes 07
- Potatoes 07
- Fallow 07
- Wells

Wm. Bolthouse Farms, Inc.
Lancaster Farms
Minn & Pardee
S407 Crops

