## SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

## 300 SOUTH GRAND AVENUE LOS ANGELES, CALIFORNIA 90071-3144

TEL: (213) 687-5000 FAX: (213) 687-5600

DIRECT DIAL 213 687-5040 DIRECT FAX 213 621-5040 EMAIL ADDRESS JGIUNTA@SKADDEN.COM

FIRM/AFFILIATE OFFICE BOSTON CHICAGO HOUSTON NEWARK **NEW YORK** SAN FRANCISCO WASHINGTON, D.C. WILMINGTON BEIJING BRUSSELS FRANKFURT HONG KONG LONDON MOSCOW PARIS SINGAPORE SYDNEY

TORONTO

November 14, 2005

Mr. Gary Lutin **LUTIN & COMPANY** 575 Madison Avenue New York, New York 10222

RE: Re: Your letter to Mr. Guenter W. Berger, dated November 9, 2005

Dear Mr. Lutin: The second sec

Farmer Bros. Co. (the "Company") has forwarded to us the above described letter and has asked us to respond to you on behalf of the Company. As Mr. Berger explained to you in his letter dated November 3, 2005, Delaware law provides for certain procedures that stockholders must follow in order to qualify to inspect the books of the Company. In addition, securities laws prohibit the disclosure of material nonpublic information, except as required or permitted by law. The Company believes these requirements are not only necessary but important in safeguarding the rights of all shareholders, not just a select few.

Accordingly, the Company will only permit a stockholder to inspect its books and records if such stockholder follows the procedures delineated under Delaware law. Also in order to prevent the selective disclosure of any material nonpublic information, the Company will require that such stockholder enter into an appropriate confidentiality agreement that will prohibit the disclosure of such information by the stockholder to any other person other than such stockholder's authorized representatives who agree to bound by the same confidentiality restrictions. In addition, under applicable securities laws possession of such information may restrict such stockholder from trading the Company's common stock for so long as such information remains material and nonpublic, and the

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Company would expect such stockholder to acknowledge this obligation in such confidentiality agreement.

If you have any questions concerning the foregoing, please contact the undersigned.

Joseph I Girinta

cc:

Guenter W. Berger John Simmons