

# C O P Y

JOB #: 627952-1 SUBP-010

ATTORNEY OR PARTY WITHOUT ATTORNEY: MICHAEL DUANE DAVIS, ESQ. SB# 093678 DEREK R. HOFFMAN, ESQ. GRESHAM, SAVAGE, NOLAN & TILDEN, PC 550 E. HOSPITALITY LANE SUITE 300 SAN BERNARDINO, CA 92408 TELEPHONE NO: (909) 890-4499 FAX NO: 909-890-9690 E-MAIL ADDRESS: MICHAEL.DAVIS@GRESHAMSAVAGE.COM ATTORNEY FOR: INTERVENOR: SCI CALIFORNIA FUNERAL SERVICES, INC. DBA JOSHUA MEMORIAL PARK	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SANTA CLARA STREET ADDRESS: 191 N FIRST ST. MAILING ADDRESS: CITY AND ZIP CODE: SAN JOSE, CA 95113 BRANCH NAME:	CASE NUMBER:  1-05-CV-049053 JUDICIAL COUNCIL COORDINATION PROCEEDING NO. 4408
PLAINTIFF/PETITIONER: ANTELOPE VALLEY GROUNDWATER CASES DEFENDANT/RESPONDENT:	
<b>DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS</b>	

THE PEOPLE OF THE STATE OF CALIFORNIA, TO THE CUSTODIAN OF RECORDS FOR:  
 SOUTHERN CA EDISON CO, 2244 WALNUT GROVE AVE., LAW DEPT., ROSEMEAD, CA 91770 Phone:  
 (626) 302-4842

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in item 3, as follows:

To: MACRO-PRO, INC On: 02/28/2020 At: 8:00 AM Location: P.O. Box 93010, Long Beach, CA 90809-3010
Do not release the requested records to the deposition officer prior to the date and time stated above.

- a. ☐ by delivering a true, legible, and durable copy of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
  - b. ☐ by delivering a true, legible, and durable copy of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
  - c. ☒ by making the original business records described in item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.
2. The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.
3. The records to be produced are described as follows (If electronically stored information is demanded, the form or forms in which each type of information is to be produced may be specified):

\*\* SEE ATTACHMENT "3" \*\*

- ☒ Continued on attachment 3.
4. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date Issued: 02/07/2020

..... MICHAEL DUANE DAVIS, ESQ. .... /s/ MICHAEL DUANE DAVIS, ESQ.  
(SIGNATURE OF PERSON ISSUING SUBPOENA)  
 (TYPE OR PRINT NAME)

Attorney for:  
 INTERVENOR: SCI CALIFORNIA FUNERAL SERVICES, INC. DBA JOSHUA MEMORIAL PARK  
 (TITLE)



PLAINTIFF/PETITIONER: ANTELOPE VALLEY GROUNDWATER CASES DEFENDANT/RESPONDENT:	CASE NUMBER: 1-05-CV-049053 JUDICIAL COUNCIL COORDINATION PROCEEDING NO. 4408
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## ATTACHMENT 3

SCE Customer Address: 808 E. Lancaster Blvd., Lancaster, CA 93535  
SCE Customer Account Number: 2-03-189-5097  
Service Account Numbers: Southern California Edison (SCE), 3-000-4430-87.  
Lancaster Choice Electric (LCE), 3-044-2455-27

- (1) All monthly and annual billing statements for these customer and service accounts for period of January 2000 to December 2014;
- (2) All groundwater well pump efficiency tests or related power testing reports from January 2000 to December 2014; and
- (3) Any other records or information pertaining to the electricity meter and usage for this account.

Re: *ANTELOPE VALLEY GROUNDWATER CASES*  
Los Angeles County Superior Court Judicial Council Coordinated  
Proceedings No. 4408; Santa Clara County Superior Court Case No. 1-05-CV-049053

I am employed in the County of San Bernardino, State of California. I am over the age of 18 years and not a party to the within action; my business address is: 550 East Hospitality Lane, Suite 300, San Bernardino, CA 92408-4205.

On February 7, 2020, I served the foregoing document(s) described **DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS** on the interested parties in this action in the following manner:

(X) BY ELECTRONIC SERVICE – I caused such document(s) listed above to be electronically served, via One Legal, to all parties appearing on the Santa Clara County Superior Court website, <http://www.scefiling.org>, in the action of the Antelope Valley Groundwater Cases; proof of electronic-filing through One Legal is then printed and maintained with the original documents in our office. Electronic service is complete at the time of transmission. My electronic notification email address is [dina.snider@greshamsavage.com](mailto:dina.snider@greshamsavage.com).

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on February 7, 2020, at San Bernardino, California.

Dina Sneider

DINA M. SNIDER