

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): <b>Frank Satalino, Esq. (CSB No. 143444)</b> <b>Law Offices of Frank Satalino</b> <b>19 Velarde Court, Rancho Santa Margarita, CA 92688</b> TELEPHONE NO.: <b>949-735-7604</b> FAX NO.: <b>949-459-5789</b> E-MAIL ADDRESS: ATTORNEY FOR (Name): <b>Defendant/Respondent, Rosamond Ranch L.P.</b>	FOR COURT USE ONLY
<b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles</b> STREET ADDRESS: <b>111 N. Hill</b> MAILING ADDRESS: CITY AND ZIP CODE: <b>Los Angeles, Ca</b> BRANCH NAME: <b>Central</b>	
PLAINTIFF/PETITIONER: <b>Antelope Valley Groundwater Cases</b> DEFENDANT/RESPONDENT: <b>Rosamond Ranch LP et al</b>	
<b>DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS</b>	CASE NUMBER: <b>JCCP4408</b>

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):  
 Custod of Records, Kern County Water Bank, 1620 Mill Rock Way, # 500, Bakersfield, CA 93311

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

To (name of deposition officer): **Frank Satalino, Esq.**

On (date): **November 8, 2012**

At (time): **9:30 a.m.**

Location (address): **19 Velarde Court, Rancho Santa Margarita, CA 92688**

**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: **October 11, 2012**

**Frank Satalino, Esq.**

(TYPE OR PRINT NAME)



(SIGNATURE OF PERSON ISSUING SUBPOENA)

**Attorney for Defendant Rosamond Ranch, L.P.**

(TITLE)

(Proof of service on reverse)

Page 1 of 2

PLAINTIFF/PETITIONER: Antelope Valley Groundwater Cases	CASE NUMBER:
DEFENDANT/RESPONDENT: Rosamond Ranch LP et al	JCCP4408

**PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS**

1. I served this *Deposition Subpoena for Production of Business Records* by personally delivering a copy to the person served as follows:

a. Person served (*name*):

b. Address where served:

c. Date of delivery:

d. Time of delivery:

e. (1)  Witness fees were paid.  
Amount: ..... \$ \_\_\_\_\_

(2)  Copying fees were paid.  
Amount: ..... \$ \_\_\_\_\_

f. Fee for service: ..... \$ \_\_\_\_\_

2. I received this subpoena for service on (*date*):

3. Person serving:

- a.  Not a registered California process server.
- b.  California sheriff or marshal.
- c.  Registered California process server.
- d.  Employee or independent contractor of a registered California process server.
- e.  Exempt from registration under Business and Professions Code section 22350(b).
- f.  Registered professional photocopier.
- g.  Exempt from registration under Business and Professions Code section 22451.
- h. Name, address, telephone number, and, if applicable, county of registration and number:

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

Date:

\_\_\_\_\_

(SIGNATURE)

**(For California sheriff or marshal use only)**

**I certify** that the foregoing is true and correct.

Date:

\_\_\_\_\_

(SIGNATURE)

### ATTACHMENT 3

#### Definitions

A. "DOCUMENTS" refers to all written or other graphic matter, including all writings as defined in *California Evidence Code § 250*. *California Evidence Code § 250* defines "writing" as follows:

[h]andwriting, typewriting, printing, photostating, photographing, photocopying, transmitting by electronic mail or facsimile, and every other means of recording upon any tangible thing, any form of communication or representation, including letters, words, pictures, sounds, or symbols, or combinations thereof, and any record thereby created, regardless of the manner in which the record has been stored.

Include electronic or magnetic media when it exists. Electronic or magnetic media DOCUMENTATION shall be submitted on a CD and must identify the software utilized and names of the data files thereon with an index to the contents on each disk and in each data file.

B. "REAL PROPERTY" refers to the real property comprised of the following Assessor's Parcel Numbers ("APN") 359-031-(02, 03, 04, 05, and 06); and 359-052-(02) located in the County of Kern, State of California, previously owned by COALINGA CORPORATION .

C. "PERSON" or "PERSONS" refers to a natural person, firm, association, organization, partnership, business trust, limited liability company, corporation, or public entity.

D. "YOU" or "YOUR" as used herein shall refer to KERN COUNTY WATER BANK and anyone authorized to take action on its behalf, including, but not limited to, all divisions, departments, boards, commissions, and all officers, directors, agents, employees, representatives, consultants, and any other person or entity acting on its behalf.

## DOCUMENT PRODUCTION REQUESTS

### REQUEST NO. 1:

Any and all DOCUMENTS which record, show, establish, set forth, and/or track the groundwater extracted by or on the REAL PROPERTY, and or used on or for the REAL PROPERTY for the calendar years 1999-2005, irrespective of the method of measurement for the groundwater extracted (be it water meter, power meter, nonmetered, or estimated, permits, etc).

### REQUEST NO. 2:

Any and all agricultural permits for the REAL PROPERTY which were issued or were active in the years 1999-2005.

### REQUEST NO. 3:

Any and all DOCUMENTS regarding, relating or pertaining to agricultural permits for the REAL PROPERTY which were issued or were active in the years 1999-2005.

### REQUEST NO. 4:

Any and all aerial photographs of the REAL PROPERTY from the years 1999 to the present.

### REQUEST NO. 5:

Any and all DOCUMENTS evidencing payment(s) made by the REAL PROPERTY owner to YOU in the years 1999-2005 for extracted groundwater.

### REQUEST NO. 6:

Any and all DOCUMENTS evidencing payment(s) made by the REAL PROPERTY owner to YOU in the years 1999-2005 for agricultural permits.

**REQUEST NO. 7:**

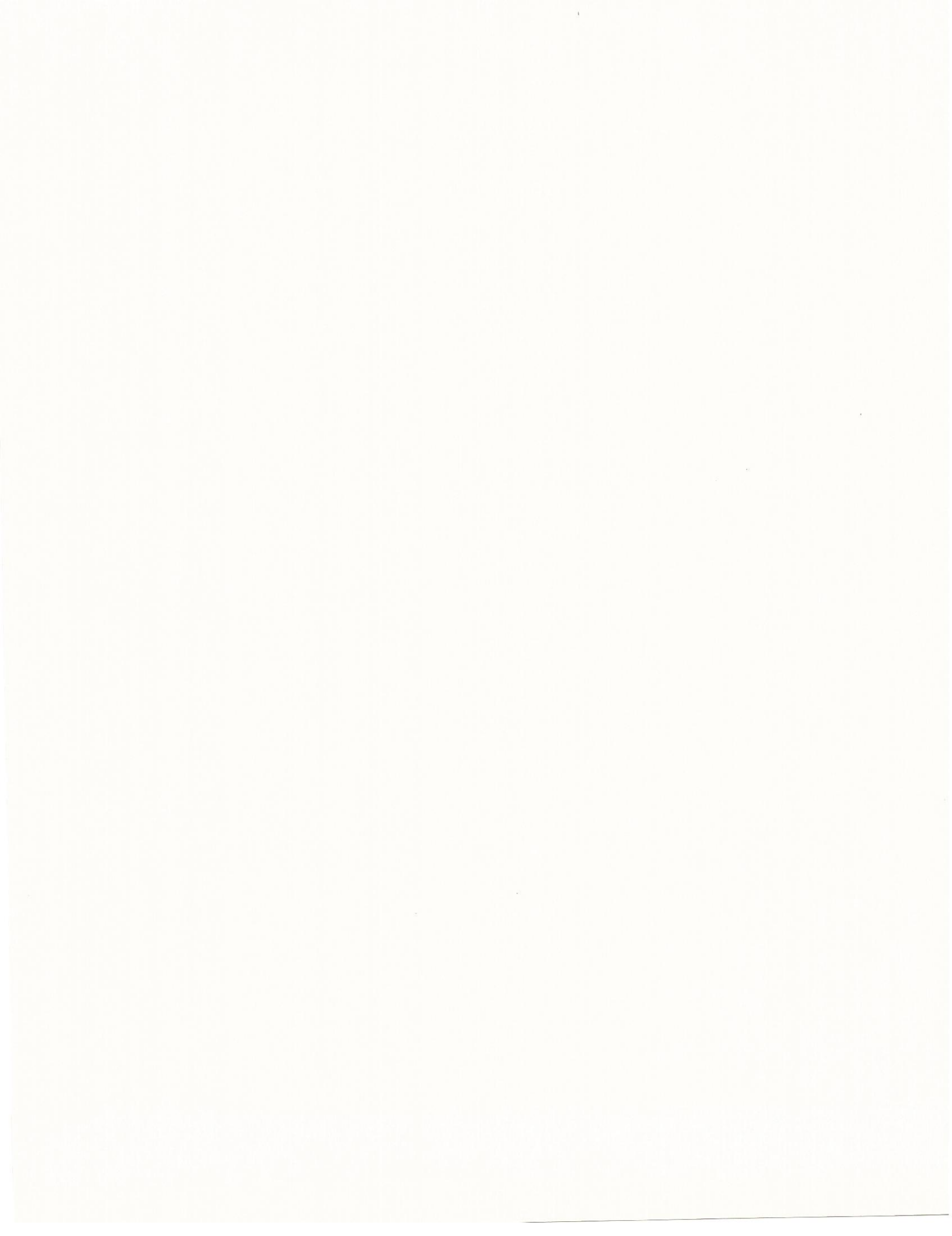
Any and all DOCUMENTS created by YOU in the years 1999-2005 for the REAL PROPERTY.

**REQUEST NO. 8:**

Any and all DOCUMENTS in YOUR possession regarding for the REAL PROPERTY relevant to groundwater extraction or diversion by the REAL PROPERTY for the years 1999-2005.

**REQUEST NO. 9:**

Any and all DOCUMENTS showing bills for water, and or electrical power for water pumping or extracting in the years 1999-2005 for the REAL PROPERTY.



ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): <b>Frank Satalino, Esq. (CSB No. 143444)</b> <b>Law Offices of Frank Satalino</b> <b>19 Velarde Court, Rancho Santa Margarita, CA 92688</b> TELEPHONE NO.: <b>949-735-7604</b> FAX NO.: <b>949-459-5789</b> E-MAIL ADDRESS: ATTORNEY FOR (Name): <b>Defendant/Respondent, Rosamond Ranch L.P.</b>	<b>FOR COURT USE ONLY</b>          CASE NUMBER: <b>JCCP4408</b>
<b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles</b> STREET ADDRESS: <b>111 N. Hill</b> MAILING ADDRESS: CITY AND ZIP CODE: <b>Los Angeles, Ca</b> BRANCH NAME: <b>Central</b>	
PLAINTIFF/PETITIONER: <b>Antelope Valley Groundwater Cases</b> DEFENDANT/RESPONDENT: <b>Rosamond Ranch LP et al</b>	
<b>DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS</b>	

**THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):**  
 Custodian of Records, Kern County Water Agency, 3200 Rio Mirada Dr., Bakersfield, CA 93308

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


To (name of deposition officer): <b>Frank Satalino, Esq.</b> On (date) : <b>November 8 , 2012</b> Location (address): <b>19 Velarde Court, Rancho Santa Margarita, CA 92688</b>	At (time): <b>9:30 a.m.</b>
<b>Do not release the requested records to the deposition officer prior to the date and time stated above.</b>	

- 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: **October 11, 2012**  
**Frank Satalino, Esq.**  
 \_\_\_\_\_  
 (TYPE OR PRINT NAME)

  
 \_\_\_\_\_  
 (SIGNATURE OF PERSON ISSUING SUBPOENA)  
**Attorney for Defendant Rosamond Ranch, L.P.**  
 \_\_\_\_\_  
 (TITLE)

PLAINTIFF/PETITIONER: <b>Antelope Valley Groundwater Cases</b> DEFENDANT/RESPONDENT: <b>Rosamond Ranch LP et al</b>	CASE NUMBER: <b>JCCP4408</b>
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**PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS**

1. I served this *Deposition Subpoena for Production of Business Records* by personally delivering a copy to the person served as follows:

- a. Person served (*name*):
- b. Address where served:
- c. Date of delivery:
- d. Time of delivery:
- e. (1)  Witness fees were paid.  
           Amount: ..... \$ \_\_\_\_\_
- (2)  Copying fees were paid.  
           Amount: ..... \$ \_\_\_\_\_
- f. Fee for service: ..... \$ \_\_\_\_\_

2. I received this subpoena for service on (*date*):

3. Person serving:
- a.  Not a registered California process server.
  - b.  California sheriff or marshal.
  - c.  Registered California process server.
  - d.  Employee or independent contractor of a registered California process server.
  - e.  Exempt from registration under Business and Professions Code section 22350(b).
  - f.  Registered professional photocopier.
  - g.  Exempt from registration under Business and Professions Code section 22451.
  - h. Name, address, telephone number, and, if applicable, county of registration and number:

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

**(For California sheriff or marshal use only)**  
**I certify** that the foregoing is true and correct.

Date:

Date:

▶ \_\_\_\_\_  
(SIGNATURE)

▶ \_\_\_\_\_  
(SIGNATURE)



### ATTACHMENT 3

#### Definitions

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[h]andwriting, typewriting, printing, photostating, photographing, photocopying, transmitting by electronic mail or facsimile, and every other means of recording upon any tangible thing, any form of communication or representation, including letters, words, pictures, sounds, or symbols, or combinations thereof, and any record thereby created, regardless of the manner in which the record has been stored.

Include electronic or magnetic media when it exists. Electronic or magnetic media DOCUMENTATION shall be submitted on a CD and must identify the software utilized and names of the data files thereon with an index to the contents on each disk and in each data file.

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## **DOCUMENT PRODUCTION REQUESTS**

### **REQUEST NO. 1:**

Any and all DOCUMENTS which record, show, establish, set forth, and/or track the groundwater extracted by or on the REAL PROPERTY, and or used on or for the REAL PROPERTY for the calendar years 1999-2005, irrespective of the method of measurement for the groundwater extracted (be it water meter, power meter, nonmetered, or estimated, permits, etc).

### **REQUEST NO. 2:**

Any and all agricultural permits for the REAL PROPERTY which were issued or were active in the years 1999-2005.

### **REQUEST NO. 3:**

Any and all DOCUMENTS regarding, relating or pertaining to agricultural permits for the REAL PROPERTY which were issued or were active in the years 1999-2005.

### **REQUEST NO. 4:**

Any and all aerial photographs of the REAL PROPERTY from the years 1999 to the present.

### **REQUEST NO. 5:**

Any and all DOCUMENTS evidencing payment(s) made by the REAL PROPERTY owner to YOU in the years 1999-2005 for extracted groundwater.

### **REQUEST NO. 6:**

Any and all DOCUMENTS evidencing payment(s) made by the REAL PROPERTY owner to YOU in the years 1999-2005 for agricultural permits.

**REQUEST NO. 7:**

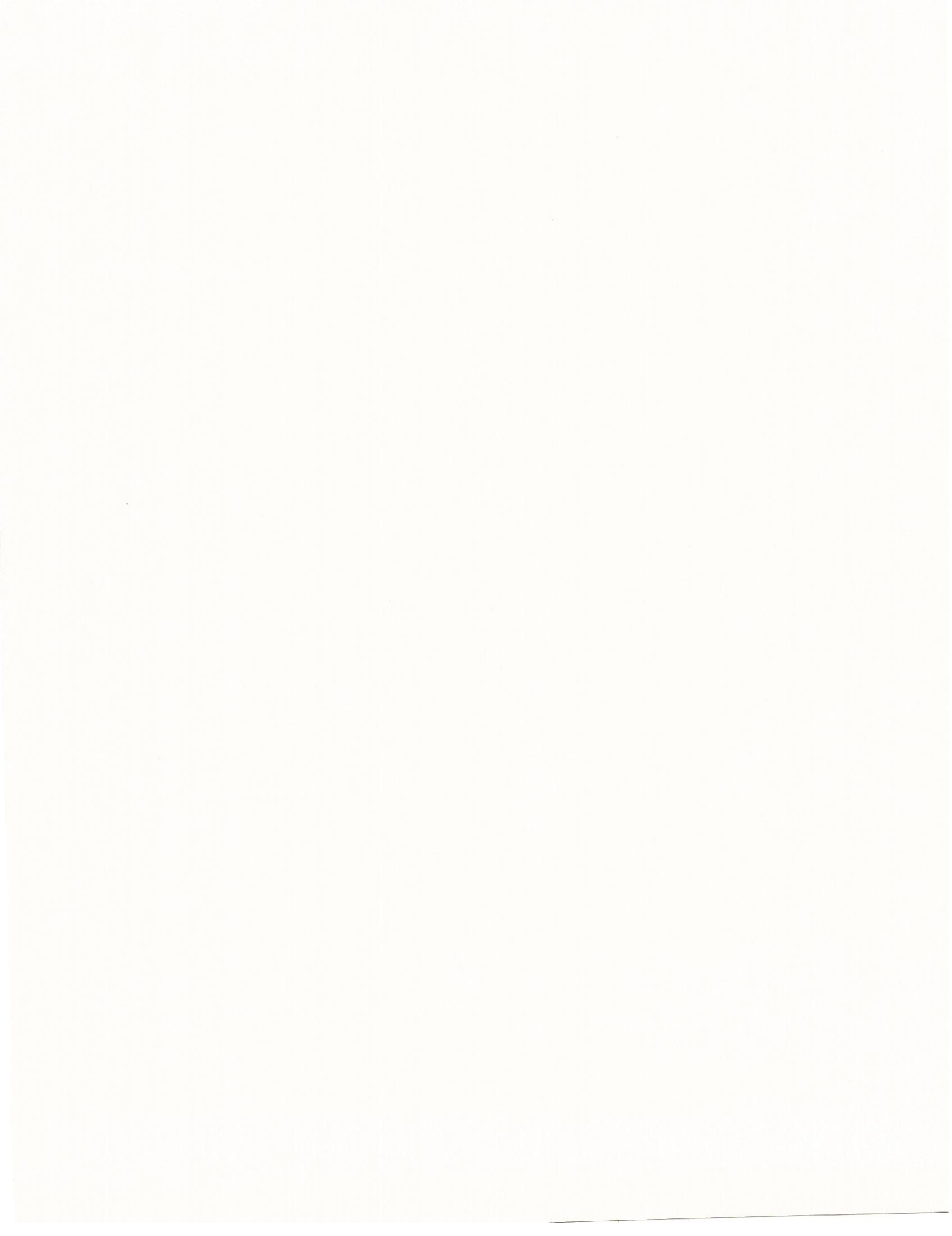
Any and all DOCUMENTS created by YOU in the years 1999-2005 for the REAL PROPERTY.

**REQUEST NO. 8:**

Any and all DOCUMENTS in YOUR possession regarding for the REAL PROPERTY relevant to groundwater extraction or diversion by the REAL PROPERTY for the years 1999-2005.

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Any and all DOCUMENTS showing bills for water, and or electrical power for water pumping or extracting in the years 1999-2005 for the REAL PROPERTY.



ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): <b>Frank Satalino, Esq. (CSB No. 143444)</b> <b>Law Offices of Frank Satalino</b> <b>19 Velarde Court, Rancho Santa Margarita, CA 92688</b> TELEPHONE NO.: <b>949-735-7604</b> FAX NO.: <b>949-459-5789</b> E-MAIL ADDRESS: ATTORNEY FOR (Name): <b>Defendant/Respondent, Rosamond Ranch L.P.</b>	<b>FOR COURT USE ONLY</b>
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PLAINTIFF/PETITIONER: <b>Antelope Valley Groundwater Cases</b> DEFENDANT/RESPONDENT: <b>Rosamond Ranch LP et al</b>	
<b>DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS</b>	CASE NUMBER: <b>JCCP4408</b>

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):  
 Custod of Records, Southern California Edison Company, 2244 Walnut Grove Ave, Rosemead, CA

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

To (name of deposition officer): **Frank Satalino, Esq.**

On (date): **November 8, 2012**

At (time): **9:30 a.m.**

Location (address): **19 Velarde Court, Rancho Santa Margarita, CA 92688**

**Do not release the requested records to the deposition officer prior to the date and time stated above.**

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**See Attachment 3**

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Date issued: **October 11, 2012**

**Frank Satalino, Esq.**

(TYPE OR PRINT NAME)

(SIGNATURE OF PERSON ISSUING SUBPOENA)

**Attorney for Defendant Rosamond Ranch, L.P.**

(TITLE)

(Proof of service on reverse)

Page 1 of 2

PLAINTIFF/PETITIONER: Antelope Valley Groundwater Cases DEFENDANT/RESPONDENT: Rosamond Ranch LP et al	CASE NUMBER: JCCP4408
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**PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS**

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a. Person served (*name*):

b. Address where served:

c. Date of delivery:

d. Time of delivery:

e. (1)  Witness fees were paid.  
Amount: ..... \$ \_\_\_\_\_

(2)  Copying fees were paid.  
Amount: ..... \$ \_\_\_\_\_

f. Fee for service: ..... \$ \_\_\_\_\_

2. I received this subpoena for service on (*date*):

3. Person serving:

a.  Not a registered California process server.

b.  California sheriff or marshal.

c.  Registered California process server.

d.  Employee or independent contractor of a registered California process server.

e.  Exempt from registration under Business and Professions Code section 22350(b).

f.  Registered professional photocopier.

g.  Exempt from registration under Business and Professions Code section 22451.

h. Name, address, telephone number, and, if applicable, county of registration and number:

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

**(For California sheriff or marshal use only)**  
**I certify** that the foregoing is true and correct.

Date:

Date:

\_\_\_\_\_

\_\_\_\_\_

(SIGNATURE)

(SIGNATURE)

### ATTACHMENT 3

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B. "REAL PROPERTY" refers to the real property comprised of the following Assessor's Parcel Numbers ("APN") 359-031-(02, 03, 04, 05, and 06); and 359-052-(02) located in the County of Kern, State of California, previously owned by COALINGA CORPORATION .

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## DOCUMENT PRODUCTION REQUESTS

### REQUEST NO. 1:

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### REQUEST NO. 2:

Any and all agricultural permits for the REAL PROPERTY which were issued or were active in the years 1999-2005.

### REQUEST NO. 3:

Any and all DOCUMENTS regarding, relating or pertaining to agricultural permits for the REAL PROPERTY which were issued or were active in the years 1999-2005.

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Any and all aerial photographs of the REAL PROPERTY from the years 1999 to the present.

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Any and all DOCUMENTS evidencing payment(s) made by the REAL PROPERTY owner to YOU in the years 1999-2005 for extracted groundwater.

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**REQUEST NO. 7:**

Any and all DOCUMENTS created by YOU in the years 1999-2005 for the REAL PROPERTY.

**REQUEST NO. 8:**

Any and all DOCUMENTS in YOUR possession regarding for the REAL PROPERTY relevant to groundwater extraction or diversion by the REAL PROPERTY for the years 1999-2005.

**REQUEST NO. 9:**

Any and all DOCUMENTS showing bills for water, and or electrical power for water pumping or extracting in the years 1999-2005 for the REAL PROPERTY.

**REQUEST NO. 10:**

Any and all bills and or invoices for electrical services generated by or sent by YOU for the REAL PROPERTY for the years 1999-2005 relevant to groundwater extraction or diversion by or on the REAL PROPERTY, such as electrical power invoices for water pumping, meters, and or extraction equipment .



ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): <b>Frank Satalino, Esq. (CSB No. 143444)</b> <b>Law Offices of Frank Satalino</b> <b>19 Velarde Court, Rancho Santa Margarita, CA 92688</b> TELEPHONE NO.: 949-735-7604 FAX NO.: 949-459-5789 E-MAIL ADDRESS: ATTORNEY FOR (Name): <b>Defendant/Respondent, Rosamond Ranch L.P.</b>	<b>FOR COURT USE ONLY</b>           CASE NUMBER: <b>JCCP4408</b>
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PLAINTIFF/PETITIONER: <b>Antelope Valley Groundwater Cases</b> DEFENDANT/RESPONDENT: <b>Rosamond Ranch LP et al</b>	
<b>DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS</b>	

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):  
 Custodian of Records, COALINGA CORPORATION, 12575 Beatrice Street, Los Angeles, Ca 90017

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

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- 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: **October 11, 2012**

**Frank Satalino, Esq.**

(TYPE OR PRINT NAME)



(SIGNATURE OF PERSON ISSUING SUBPOENA)

**Attorney for Defendant Rosamond Ranch, L.P.**

(TITLE)

(Proof of service on reverse)

Page 1 of 2

PLAINTIFF/PETITIONER: Antelope Valley Groundwater Cases	CASE NUMBER:
DEFENDANT/RESPONDENT: Rosamond Ranch LP et al	JCCP4408

**PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS**

1. I served this *Deposition Subpoena for Production of Business Records* by personally delivering a copy to the person served as follows:

a. Person served (*name*):

b. Address where served:

c. Date of delivery:

d. Time of delivery:

e. (1)  Witness fees were paid.  
Amount: ..... \$ \_\_\_\_\_

(2)  Copying fees were paid.  
Amount: ..... \$ \_\_\_\_\_

f. Fee for service: ..... \$ \_\_\_\_\_

2. I received this subpoena for service on (*date*):

3. Person serving:

- a.  Not a registered California process server.
- b.  California sheriff or marshal.
- c.  Registered California process server.
- d.  Employee or independent contractor of a registered California process server.
- e.  Exempt from registration under Business and Professions Code section 22350(b).
- f.  Registered professional photocopier.
- g.  Exempt from registration under Business and Professions Code section 22451.
- h. Name, address, telephone number, and, if applicable, county of registration and number:

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

**(For California sheriff or marshal use only)**  
**I certify** that the foregoing is true and correct.

Date:

Date:

\_\_\_\_\_

\_\_\_\_\_

(SIGNATURE)

(SIGNATURE)

### ATTACHMENT 3

#### Definitions

A. "DOCUMENTS" refers to all written or other graphic matter, including all writings as defined in *California Evidence Code § 250*. *California Evidence Code § 250* defines "writing" as follows:

[h]andwriting, typewriting, printing, photostating, photographing, photocopying, transmitting by electronic mail or facsimile, and every other means of recording upon any tangible thing, any form of communication or representation, including letters, words, pictures, sounds, or symbols, or combinations thereof, and any record thereby created, regardless of the manner in which the record has been stored.

Include electronic or magnetic media when it exists. Electronic or magnetic media DOCUMENTATION shall be submitted on a CD and must identify the software utilized and names of the data files thereon with an index to the contents on each disk and in each data file.

B. "REAL PROPERTY" refers to the real property comprised of the following Assessor's Parcel Numbers ("APN") 359-031-(02, 03, 04, 05, and 06); and 359-052-(02) located in the County of Kern, State of California, previously owned by COALINGA CORPORATION .

C. "PERSON" or "PERSONS" refers to a natural person, firm, association, organization, partnership, business trust, limited liability company, corporation, or public entity.

D. "YOU" or "YOUR" as used herein shall refer to COALINGA CORPORATION and anyone authorized to take action on its behalf, including, but not limited to, all divisions, departments, boards, commissions, and all officers, directors, agents, employees, representatives, consultants, and any other person or entity acting on its behalf.

## **DOCUMENT PRODUCTION REQUESTS**

### **REQUEST NO. 1:**

Any and all DOCUMENTS which record, show, establish, set forth, and/or track the groundwater extracted by or on the REAL PROPERTY, and or used on or for the REAL PROPERTY for the calendar years 1999-2005, irrespective of the method of measurement for the groundwater extracted (be it water meter, power meter, nonmetered, or estimated, permits, etc).

### **REQUEST NO. 2:**

Any and all agricultural permits for the REAL PROPERTY which were issued or were active in the years 1999-2005.

### **REQUEST NO. 3:**

Any and all DOCUMENTS regarding, relating or pertaining to agricultural permits for the REAL PROPERTY which were issued or were active in the years 1999-2005.

### **REQUEST NO. 4:**

Any and all aerial photographs of the REAL PROPERTY from the years 1999 to the present.

### **REQUEST NO. 5:**

Any and all DOCUMENTS evidencing payment(s) made by the REAL PROPERTY owner to YOU in the years 1999-2005 for extracted groundwater.

### **REQUEST NO. 6:**

Any and all DOCUMENTS evidencing payment(s) made by the REAL PROPERTY owner to YOU in the years 1999-2005 for agricultural permits.

**REQUEST NO. 7:**

Any and all DOCUMENTS created by YOU in the years 1999-2005 for the REAL PROPERTY.

**REQUEST NO. 8:**

Any and all DOCUMENTS in YOUR possession regarding for the REAL PROPERTY relevant to groundwater extraction or diversion by the REAL PROPERTY for the years 1999-2005.

**REQUEST NO. 9:**

Any and all DOCUMENTS showing bills and or invoices for water, and or for electrical power for water pumping, meters and or extracting, for the REAL PROPERTY in the years 1999-2005.