

1 FRANK SATALINO, ESQ., CSB NO. 143444
2 LAW OFFICES OF FRANK SATALINO
3 19 Velarde Court
4 Rancho Santa Margarita, Ca 92688
5 Telephone: 949-735-7604; Facsimile: 949-459-5789
6 Attorneys for Defendants ROSAMOND RANCH, L.P. ; ELIAS SHOKRIAN; SHIRLEY
7 SHOKRIAN

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SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

ANTELOPE VALLEY GROUNDWATER)	Judicial Counsel Coordination Proceeding
CASES)	No.: 4408
)	
Including Consolidated Cases:)	Lead Case: BC 325 201
)	
Los Angeles County Waterworks District No. 40)	
v. Diamond Farming Co., Superior Court of)	OBJECTION OF ROSAMOND RANCH
California, County of Los Angeles, Case No.:)	TO BOLTHOUSE PROPERTIES, LLC
BC 325201)	AND WM. BOLTHOUSE FARMS, INC.
)	NOTICE TO APPEAR AND PRODUCE
AND RELATED CONSOLIDATED CASES:)	AT TRIAL
)	
)	
)	TRIAL DATE: May 28, 2013
)	TIME: 9:00 a.m.
)	DEPT: 1
)	

TO THE COURT AND ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

Defendants ROSAMOND RANCH, L.P., (hereinafter “respondent”) hereby objects to the Notice to Appear and Produce Documents at trial of BOLTHOUSE PROPERTIES, LLC AND WM. BOLTHOUSE FARMS, INC on it served on it by e service on its counsel on May 10, 2013 pursuant to CCP 1987 on the following grounds: (1) service of notice and request for documents was untimely pursuant to CCP 1987 (C) and 1013(a); (2) service of subpoena was made by e service only, which was not consented to by respondent for service of process and

1 subpoena; objection is thus made pursuant to CCP 1987 (b)(c) and CCP 1013(a); notice in
2 lieu and subpoena was not issued specifically to respondent, but globally to scores of parties in
3 one purported subpoena; objection per CCP 1987 (b); (4) the request for documents was not
4 particularized, failing to specifically request the exact documents requested with particularity;
5 objection is made per CCP 1987(c); and (5) no witness fees were tendered as required by CCP
6 1987.
7

8 RESPECTFULLY SUBMITTED

9
10 LAW OFFICES OF FRANK SATALINO

11 Dated: May 15, 2013

12 By: Frank Satalino, Esq.
13 FRANK SATALINO, Esq.
14 Attorneys for Defendant ROSAMOND
15 RANCH, L.P. and ELIAS and SHIRLEY
16 SHOKRIAN
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4 **PROOF OF SERVICE**

5 STATE OF CALIFORNIA)
6) ss
7 COUNTY OF ORANGE)

8 I am employed in the County of Orange, State of California. I am over the age of 18 years
9 and not a party to this action. My business address is 19 Velarde Court, Rancho Santa
10 Margarita, CA 92688.

11 On May 15, 2013 I served the foregoing document described as: **OBJECTION** on the
12 interested parties in this action as follows:

13 **(Electronic service)** By posting the document above to the Santa Clara County
14 Superior Court website in regard to the Antelope Valley groundwater matter _ (all
15 parties)

16 **(Service By Mail)** I caused such envelope, with postage thereon, fully prepaid, to be
17 placed for deposit at 19 Velarde Court, Rancho Santa Margarita, CA 92688, in the
18 United States Postal Service. I am familiar with the regular mail collection and
19 processing practices of this office that the mail would be deposited with the United
20 States Postal Service within one day of the within date in the ordinary course of
21 business, and that the envelope was sealed and deposited for collection and mailing on
22 the above date following ordinary business practices on the following:.

23 Richard Zimmer; Clifford & Brown (only)
24 1430 Truxton Avenue, Suite 900
25 Bakersfield, CA 93301-5230
26 (661) 322-6023
27 Attorneys for Bolthouse Properties; Wm Bolthouse Farms

28 _____ **(Personal Service)** I caused such envelope to be delivered by hand to the addressee(s).

_____ **(Via Facsimile)** By faxing copies to the person(s) above named.

_____ **(FEDERAL)** I declare that I am employed in the office of a member of the bar of this
Court at whose direction the service was made.

I declare under penalty of perjury under the laws of the State of California that the
foregoing is true and correct, and that this Proof of Service was executed on May 15, 2013 at
Rancho Santa Margarita, California.

By: _____
FRANK SATALINO