

EXHIBIT A

CHARLTON WEEKS LLP
1031 West Avenue M-14, Suite A
Palmdale, CA 93551

1 BRADLEY T. WEEKS, Bar No. 173745
2 CHARLTON WEEKS LLP
3 1031 West Avenue M-14, Suite A
4 Palmdale, CA 93551
5 (661) 265-0969
6
7
8 Attorney for Quartz Hill Water District
9 Defendant/Cross Complainant
10

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 FOR THE COUNTY OF LOS ANGELES-CENTRAL DISTRICT
13

14 ANTELOPE VALLEY GROUNDWATER
15 CASES

**Judicial Council Coordination Proceeding No.
4408**

16 Included Actions:

Santa Clara Case No. 1-05-CV-049053
Assigned to the Honorable Jack Komar Dept. I

17 Los Angeles County Waterworks District No.
18 40 v. Diamond Farming Co.
19 Superior Court of California, County of Los
20 Angeles, Case No. BC325201;

SPECIAL INTERROGATORIES (SET ONE)

21 Los Angeles County Waterworks District
22 No. 40 v. Diamond Farming Co.
23 Superior Court of California
24 County of Kern, Case No. S-1500-CV-254-
25 348;

26 Wm. Bolthouse Farms, Inc. v. City of
27 Lancaster
28 Diamond Farming Co. v. City of Lancaster
Diamond Farming Co. v. Palmdale Water Dist.
Superior Court of California
County of Riverside, consolidated actions
Case Nos. RIC 353840, RIC 344436,
RIC 344668.

29 PROPOUNDING PARTY: QUARTZ HILL WATER DISTRICT

30 RESPONDING PARTY: SEE EXHIBIT ONE

31 SET NO.: ONE

1 PLEASE TAKE NOTICE that requesting party requests that responding party answer the
2 following interrogatories under oath within thirty (30) days after service of these interrogatories,
3 or such additional time as may be permitted by law, under Code of Civil Procedure §2030.010 et.
4 seq.

5
6 **Interrogatory Number 1.**

7 Identify all real property YOU (YOU refers to the party responding to these requests) own in the
8 BASIN (BASIN shall be defined as on and below the ground surface within the jurisdictional area
9 defined by the court in this matter by order dated March 16, 2007) using the most recent assessor's
10 parcel number, *also known as* assessor's identification number, designated by the Los Angeles
11 County Assessor or the Kern County Assessor. A full and complete response to this interrogatory
12 shall list all such parcel numbers (e.g. Los Angeles County 123-456-7890).

13
14 **Interrogatory Number 2.**

15 For each PARCEL (PARCEL shall be defined as that real property which has given a numbered or
16 lettered designation by the Los Angeles or Kern County assessor pursuant to California Revenue
17 and Taxation Code section 327) YOU own in the BASIN state name or names of the entity,
18 person, or persons who are on record title to each PARCEL.

19
20 **Interrogatory Number 3.**

21 For each PARCEL YOU own which is located in the BASIN, state the date when YOU acquired
22 ownership of that PARCEL.

23
24 **Interrogatory Number 4.**

25 For each PARCEL YOU own which is located in the BASIN, state the number of groundwater
26 wells that have been on that PARCEL that have been active at any time since January 1, 1951.

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1 **Interrogatory Number 5.**

2 For each PARCEL YOU own which is located in the BASIN, state how each PARCEL has been
3 used since January 1, 1951. An irrigated agricultural use may be described as "agricultural."

4
5 **Interrogatory Number 6.**

6 For each PARCEL YOU own which is located in the BASIN, state how much groundwater has
7 been pumped from the groundwater wells located on that PARCEL, on an annual basis, since
8 1951.

9
10 **Interrogatory Number 7.**

11 For each PARCEL YOU own which is located in the BASIN, state how much groundwater has
12 been used on that PARCEL, on an annual basis, since 1951.

13
14 **Interrogatory Number 8.**

15 For each PARCEL YOU own which is located in the BASIN, state how much water has been
16 used, on an annual basis, on the property since 1951.

17
18 **Interrogatory Number 9.**

19 For each groundwater well that is on a PARCEL YOU own which is located in the BASIN,
20 IDENTIFY all DOCUMENTS that indicate how much groundwater has been pumped from each
21 well since January 1, 1951.

22 "DOCUMENT" shall be defined as and have the same broad meaning as it has in California
23 Evidence Code § 250 and Code of Civil Procedure §2031.010 et seq. and includes documents,
24 papers, books, accounts, letters, records, photographs, objects, and all other tangible things. It
25 includes all forms of written communication. It specifically includes all originals, copies,
26 duplicates, drafts, or other recordings of any written, graphic, or otherwise recorded matter,
27 however produced or reproduced, whether inscribed by hand or by mechanical, electronic,
28 microfilm, photographic, phonic, or any other means. It includes abstracts; address books;

1 advertisements; affidavits or statements; agreements; analyses of any kind; appointment books;
2 architectural blueprints or drawings; balance sheets; bids; billings; blueprints; books or records of
3 account; purchase orders; work papers; brochures; bulletins; calendars; charts; checks and
4 canceled checks; circulars; compilations; computer cards, runs, and printouts; computer programs;
5 computer tapes and discs; consultants' reports or studies; contracts; correspondence; data
6 processing input and output; data sheets; desk calendars; diagrams; diaries; directories; discs;
7 drawings; estimates; expense account records; experts' reports or studies; financial statements or
8 calculations; graphs; house publications; income statements; inspection records, sheets, and
9 reports; interoffice and intra-office communications; invoices; job descriptions or assignments;
10 journals; layouts; ledgers; letters; licenses; lists; magnetic tapes; manuals; maps; memorandums of
11 any kind; microfiche; microfilm; minutes or records of any kind; movies; notations; notes;
12 notebooks; opinions; organizational charts; pamphlets; permits; photographs; pictures; plans;
13 projections; promotional materials; press releases or clippings; publications; punch cards;
14 procedures; questionnaires and answers to them; quotations; records and recordings of any kind;
15 renderings; reports of any kind; rework instructions, orders, and procedures; routing slips;
16 schedules; sound recordings; specifications; statistical analyses; stenographers' notebooks; studies
17 of any kind, analyses, forecasts, and evaluations; subcontracts; summaries; surveys; tables,
18 indices, and lists; tabulations; tallies; tapes; telegrams; cables; telephone messages, telephone logs,
19 and telephone billings and statements; teletype and telex messages; trade letters; transcripts,
20 minutes, reports, and recordings of telephone or other conversations, interviews, conferences,
21 committee meetings, or other meetings; undertakings; video tapes; vouchers; and working
22 drawings, papers, and files.

23 "IDENTIFY" shall mean means to identify the document's author, signor, sender, addressee, and
24 all recipients; to state the document's title, date, and number of pages; to describe its subject
25 matter; and to state the document's present location, the name and address of any person currently
26 having custody or control of the document, and any other descriptive information necessary to
27 identify the document sufficiently in a subpoena duces tecum or a request for production; and
28

1 **Interrogatory Number 10.**

2 For each groundwater well that is on a PARCEL YOU own which is located in the BASIN, state
3 whether or not that well is metered.

4
5 **Interrogatory Number 11.**

6 For each groundwater well that is on a PARCEL YOU own which is located in the BASIN, and
7 which is metered, IDENTIFY all meter records.

8
9 **Interrogatory Number 12.**

10 For each groundwater well that is on a PARCEL YOU own which is located in the BASIN, and
11 which is not metered, provide the horse power of the well pump.

12
13 **Interrogatory Number 13.**

14 For each groundwater well that is on a PARCEL YOU own which is located in the BASIN, and
15 which is not metered, state the size of the well casing.

16
17 **Interrogatory Number 14.**

18 For each groundwater well that is on a PARCEL YOU own which is located in the BASIN, and
19 which is not metered, state the efficiency of the well for each year since 1951.

20
21 **Interrogatory Number 15.**

22 For each groundwater well that is on a PARCEL YOU own which is located in the BASIN, and
23 which is not metered, state the standing water level of the well for each year since 1951.

24
25 **Interrogatory Number 16.**

26 For each groundwater well that is on a PARCEL YOU own which is located in the BASIN, and
27 which is not metered, IDENTIFY all electrical records of electricity used to power such well.

28

1 **Interrogatory Number 17.**

2 For each groundwater well that is on a PARCEL YOU own which is located in the BASIN, and
3 which is not metered, IDENTIFY all diesel records.

4
5 **Interrogatory Number 18.**

6 For each groundwater well from which you, or the predecessor owners of YOUR PARCEL, have
7 pumped groundwater in the BASIN since 1951, state the method used to calculate the annual
8 amount of groundwater pumping.

9
10 **Interrogatory Number 19.**

11 For each groundwater well from which YOU, or the predecessor owners of YOUR PARCEL, have
12 pumped groundwater in the BASIN since 1951, if the method used to calculate the annual amount
13 of groundwater pumping was not by metering, state the amount, expressed in acres, of the
14 irrigated crops in each year.

15
16 **Interrogatory Number 20.**

17 For each groundwater well from which YOU, or the predecessor owners of YOUR PARCEL, have
18 pumped groundwater in the BASIN since 1951, if the method used to calculate the annual amount
19 of groundwater pumping was not by metering, state the crop type of the irrigated crops in each
20 year.

21
22 **Interrogatory Number 21.**

23 For each groundwater well from which YOU, or the predecessor owners of YOUR PARCEL, have
24 pumped groundwater in the BASIN since 1951, if the method used to calculate the annual amount
25 of groundwater pumping was not by metering, state the irrigation method used to irrigate the
26 crops.

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1 **Interrogatory Number 22.**

2 IDENTIFY each entity, person, or persons who own land in the BASIN and who pumps
3 groundwater from that land and is not a party to this litigation. This request does not include
4 members of the Wood Class.

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CHARLTON WEEKS LLP

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7 Dated: September 12, 2012



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Bradley T. Weeks

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Attorney for Quartz Hill Water District

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- 1 Baxter Mutual Water Co.
- 2 Chavez, Efren
- 3 Granite Construction Company
- 4 Holliday Rock Co., Inc.
- 5 LITTLE ROCK SAND AND GRAVEL, INC.
- 6 Qarmout, Elias
- 7 Saint Andrew's Abbey, Inc., Roe 623
- 8 The Frank and Yvonne Lane Family Trust, Dated March 5, 1993 as Restated July 20, 2000
- 9 The George and Charlene Lane Family Trust
- 10 White Fence Farms Mutual Water No 3
- 11 GENE BAHLMAN
- 12 WILLIAM BARNES
- 13 WILLIAM BARNES AS TRUSTEE OF BARNES FAMILY TRUST
- 14 JULIE BARNES
- 15 THOMAS BOOKMAN
- 16 JOHN CALANDRI FARMS
- 17 SON RISE FARMS
- 18 SAL CARDILE
- 19 CONNIE CARDILE
- 20 RAMIN ZOMORODI
- 21 GENZ DEVELOPMENT
- 22 CASTLE RANCH ESTATE
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- 24 STEVEN GODDE
- 25 STEVEN AND LAWRENCE GODDE AS TRUSTEES OF FORREST GODDE TRUST
- 26 ROBERT GORRINDO
- 27 ROBERT GORRINDO AS TRUSTEE OF GORRINDO FAMILY TRUST
- 28 PHILLIP GORRINDO

- 1 LAURA GRIFFIN
- 2 LEONARD "LEN" GRIFFIN (DECEASED)
- 3 JANE HEALY
- 4 HEALY FARMS
- 5 HABOD (JOHN) JAVADI
- 6 ESPIE MEDELLIN
- 7 BRADLEY AND NINA MATSON
- 8 BILLIE J. DICKEY AND RANDALL DICKEY
- 9 HARLAN D. WILLIAMS, TRUSTEE
- 10 EVERT KEMPENAAR
- 11 VIKI KEMPENAAR
- 12 BARBARA BENCHOFF
- 13 CLEMENT (TOM) ORSOLANO
- 14 MARK W. BENZ AND NANCY L. BENZ
- 15 GLEN BRITTNER
- 16 GLEN BRITTNER AS TRUSTEE OF BRITTNER TRUST
- 17 JAMES BRIDWELL
- 18 ELIZABETH BRIDWELL
- 19 IRMA-ANN CARLE TRUST
- 20 EDDY CASTELLANOS
- 21 CANDACE M. CASTELLANOS
- 22 C. LOUISE CLOSE
- 23 R. CLOSE
- 24 JOSEPH DAVIS
- 25 DONNA PETTUS-DEVANS
- 26 RICHARD DENNING
- 27 ANTHONY DENNING/RAIRDEN
- 28 KATHRYN DENNING/RAIRDEN

- 1 DOLAN FAMILY TRUST
- 2 MARGARET DOLAN, TRUSTEE OF DOLAN FAMILY TRUST
- 3 LAWRENCE DEAN EVANS
- 4 SUSAN EVANS
- 5 RUTH FINDLEY
- 6 LEAH FRANKENBERG
- 7 INGRID FULCHER
- 8 WALTER GRABE
- 9 NANCY GRABE
- 10 WESLEY GRAY
- 11 LOIS GRAY
- 12 ALETHA GROSSMAN
- 13 MARY LOUISE HOPKINS
- 14 FORROST WAYNE
- 15 JEAN INDART
- 16 JAMES LEER
- 17 DIANA LEER
- 18 KERRY LENSING
- 19 VALERIE LENSING
- 20 DENNIS MCWILLIAMS
- 21 DIANE MCWILLIAMS
- 22 KEITH MARKS
- 23 JUST MARKS
- 24 BRADLEY MATSON
- 25 NINA MATSON
- 26 LARRY MICK
- 27 JACK MILBURN
- 28 ,MARIANNE MILBURN

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- 1 ADELE MILBURN
- 2 MILBURN FAMILY TRUST
- 3 LYMAN MOMENY
- 4 MARILYN MOMENY
- 5 CHESTER OLIN
- 6 MARIANNE OLIN
- 7 ANDREW OLSON
- 8 KALIE VAN METER
- 9 RICHARD PASSMORE, JR.
- 10 VANCE POMEROY
- 11 KIMBERELY POMEROY
- 12 JOHN POSTON
- 13 PATRICIA POSTON
- 14 DIANA RODNEY
- 15 SUZANNE RICHTER
- 16 RAFAEL ROMERO
- 17 MARTIWIANA SANDOVAL
- 18 LAWRENCE SCHILLING
- 19 MARY SCHILLING
- 20 LORRAINE SHONE
- 21 JACK SIMENSEN
- 22 BARBARA SIMENSEN
- 23 RONALD SUGAJSKI
- 24 SHARON SUGAJSKI
- 25 GLENN TAYLOR
- 26 RUDOLP TURK
- 27 RULOP TURK AS TRUSTEE OF TURK TRUST
- 28 PAMELA TURK

- 1 MARIE UNINI
- 2 ROBERT LECLAIR
- 3 MICHAEL WEATHERBIE
- 4 MICHAEL WEATHERBIE AS TRUSTEE OF WEATHERBIE TRUST
- 5 DOLOROES WEATHERBIE
- 6 ANTHONY WEST
- 7 MARY WEST
- 8 RONALD WHITT
- 9 LOUISE WHITT
- 10 ROBERT WISE
- 11 ROBERT WITT
- 12 EVELYN WITT
- 13 BEVERLY A. KINDIG
- 14 EUGENE V. KINDIG
- 15 PAUL S. KINDIG
- 16 SHARON R. KINDIG
- 17 DR. SAMUEL KREMEN
- 18 JOSE MARIA (JOHN) MARITORENA
- 19 JOSE MARIA (JOHN) MAITORENA AS TRUSTEE OF MARITORENA LIVING TRUST
- 20 MARIE PIERRE MARITORENA
- 21 RICHARD H. MINER
- 22 NEBEKER RANCH
- 23 R&M RANCH, INC.
- 24 JOHN RECA
- 25 ADRIENNE RECA
- 26 MABEL SELAK
- 27 JEFFREY L. SIEBERT
- 28 NANCEE J. SIEBERT

CHARLTON WEEKS LLP
1031 West Avenue M-14, Suite A
Palmdale, CA 93551

- 1 VULCAN LANDS INC
- 2 VULCAN MATERIALS COMPANY
- 3 WILLOW SPRINGS COMPANY (NON-PROFIT)
- 4 RICHARD NELSON
- 5 MIKE NELSON
- 6 DONNA WILSON
- 7 NINA J. WILSON

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EXHIBIT B

CHARLTON WEEKS LLP
1031 West Avenue M-14, Suite A
Palmdale, CA 93551

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BRADLEY T. WEEKS, Bar No. 173745
CHARLTON WEEKS LLP
1031 West Avenue M-14, Suite A
Palmdale, CA 93551
(661) 265-0969

Attorney for Quartz Hill Water District
Defendant/Cross Complainant

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES-CENTRAL DISTRICT

ANTELOPE VALLEY GROUNDWATER
CASES

Included Actions:

Los Angeles County Waterworks District No.
40 v. Diamond Farming Co.
Superior Court of California, County of Los
Angeles, Case No. BC325201;
Los Angeles County Waterworks District
No. 40 v. Diamond Farming Co.
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348;
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Diamond Farming Co. v. City of Lancaster
Diamond Farming Co. v. Palmdale Water Dist.
Superior Court of California
County of Riverside, consolidated actions
Case Nos. RIC 353840, RIC 344436,
RIC 344668.

**Judicial Council Coordination Proceeding No.
4408**

Santa Clara Case No. 1-05-CV-049053
Assigned to the Honorable Jack Komar Dept. I

**REQUEST FOR PRODUCTION OF
DOCUMENTS (SET ONE)**

PROPOUNDING PARTY: QUARTZ HILL WATER DISTRICT
RESPONDING PARTY: SEE EXHIBIT ONE
SET NO.: ONE

1 Pursuant to the provision of Code of Civil Procedure §2031.010 you are requested to
2 identify and produce all documents described herein within 30 days of the date of service hereof,
3 as may be extended by service by mail as set forth in the Code of Civil Procedure.

4 The propounding party requests that the documents be produced in an electronic medium
5 with the format of the files as either pdf or tiff at the law offices of Charlton Weeks LLP, within
6 the time allowed, unless an alternate location and time have been agreed upon. Responding party
7 shall provide a written response hereto in compliance with Code of Civil Procedure §§2031.210 et
8 seq.

9
10 **DEFINITIONS**

11 1. "BASIN" BASIN shall be defined as on and below the ground surface within the
12 jurisdictional area defined by the court in this matter by order dated March 16, 2007.

13 2. "DOCUMENT" shall be defined as and have the same broad meaning as it has in
14 California Evidence Code § 250 and Code of Civil Procedure §2031.010 et seq. and includes
15 documents, papers, books, accounts, letters, records, photographs, objects, and all other tangible
16 things. It includes all forms of written communication. It specifically includes all originals,
17 copies, duplicates, drafts, or other recordings of any written, graphic, or otherwise recorded
18 matter, however produced or reproduced, whether inscribed by hand or by mechanical, electronic,
19 microfilm, photographic, phonic, or any other means. It includes abstracts; address books;
20 advertisements; affidavits or statements; agreements; analyses of any kind; appointment books;
21 architectural blueprints or drawings; balance sheets; bids; billings; blueprints; books or records of
22 account; purchase orders; work papers; brochures; bulletins; calendars; charts; checks and
23 canceled checks; circulars; compilations; computer cards, runs, and printouts; computer programs;
24 computer tapes and discs; consultants' reports or studies; contracts; correspondence; data
25 processing input and output; data sheets; desk calendars; diagrams; diaries; directories; discs;
26 drawings; estimates; expense account records; experts' reports or studies; financial statements or
27 calculations; graphs; house publications; income statements; inspection records, sheets, and
28 reports; interoffice and intra-office communications; invoices; job descriptions or assignments;

1 journals; layouts; ledgers; letters; licenses; lists; magnetic tapes; manuals; maps; memorandums of
2 any kind; microfiche; microfilm; minutes or records of any kind; movies; notations; notes;
3 notebooks; opinions; organizational charts; pamphlets; permits; photographs; pictures; plans;
4 projections; promotional materials; press releases or clippings; publications; punch cards;
5 procedures; questionnaires and answers to them; quotations; records and recordings of any kind;
6 renderings; reports of any kind; rework instructions, orders, and procedures; routing slips;
7 schedules; sound recordings; specifications; statistical analyses; stenographers' notebooks; studies
8 of any kind, analyses, forecasts, and evaluations; subcontracts; summaries; surveys; tables,
9 indices, and lists; tabulations; tallies; tapes; telegrams; cables; telephone messages, telephone logs,
10 and telephone billings and statements; teletype and telex messages; trade letters; transcripts,
11 minutes, reports, and recordings of telephone or other conversations, interviews, conferences,
12 committee meetings, or other meetings; undertakings; video tapes; vouchers; and working
13 drawings, papers, and files.

14 3. "YOU" or "YOUR" shall mean the party responding to these interrogatories, and shall
15 also include all representatives and agents of the party responding to these interrogatories, all of
16 the party responding to these interrogatories predecessors or successors in interest, and all other
17 PERSONS acting or purporting to act on behalf of party responding to these interrogatories.

18
19 The public water supplier's expert witness report, nor documents produced by public water
20 suppliers, is included in any of the following requests.

21
22 **REQUESTS FOR PRODUCTION**

23
24 **Request for Production Number 1.**

25 Produce all DOCUMENTS identified in YOUR response to the special interrogatories (set one)
26 served upon YOU concurrently with this request.

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1 **Request for Production Number 2.**

2 Produce all DOCUMENTS identified in YOUR response to form interrogatory 17.1 served upon
3 you concurrently with this request.

4
5 **Request for Production Number 3.**

6 Produce all groundwater pump meter records for groundwater pumped in the BASIN since 1951
7 from real property YOU own in the BASIN.

8
9 **Request for Production Number 4.**

10 Produce all meter records for groundwater used in the BASIN since 1951 from real property YOU
11 own in the BASIN.

12
13 **Request for Production Number 5.**

14 Produce all meter records for water used in the BASIN since 1951 from real property YOU own in
15 the BASIN.

16
17 **Request for Production Number 6.**

18 Produce all electrical meter records which indicate how much groundwater has been pumped in
19 the BASIN since 1951 from real property YOU own in the basin. If you have produced meter
20 records in response to request for production three, you need not produce the electrical meter
21 records for the times covered by the produced meter records.

22
23 **Request for Production Number 7.**

24 Produce all diesel records for groundwater pumped in the BASIN since 1951 from real property
25 YOU own. If you have produced meter records in response to request for production three, you
26 need not produce the electrical meter records for the times covered by the produced meter records.

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28

1 **Request for Production Number 8.**

2 Produce all DOCUMENTS which indicate the amount of groundwater pumped since 1951 from
3 real property YOU own in the BASIN.

4
5 **Request for Production Number 9.**

6 Produce all DOCUMENTS which relate to YOUR calculation of the amount of groundwater
7 pumped or used by YOU or YOUR predecessors in the BASIN since 1951 from real property
8 YOU own in the BASIN.

9
10 **Request for Production Number 10.**

11 Produce all First and Annual Notices for Groundwater Extraction YOU have filed with the
12 California State Water Reassurances Control Board for all groundwater pumped in the BASIN
13 since 1951.

14
15 **Request for Production Number 11.**

16 Produce all First and Annual Notices for Groundwater Extraction YOU have filed with Los
17 Angeles County for all groundwater pumped in the BASIN since 1951.

18
19 **Request for Production Number 12.**

20 Produce all First and Annual Notices for Groundwater Extraction that relate to any real property
21 YOU own in the BASIN.

22
23 **Request for Production Number 13.**

24 Produce all DOCUMENTS that indicate how much groundwater any party to this ligation has
25 pumped in the BASIN since 1951.

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Dated: September 12, 2012

CHARLTON WEEKS LLP



Bradley T. Weeks
Attorney for Quartz Hill Water District

- 1 Baxter Mutual Water Co.
- 2 Chavez, Efren
- 3 Granite Construction Company
- 4 Holliday Rock Co., Inc.
- 5 LITTLE ROCK SAND AND GRAVEL, INC.
- 6 Qarmout, Elias
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- 8 The Frank and Yvonne Lane Family Trust, Dated March 5, 1993 as Restated July 20, 2000
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- 11 GENE BAHLMAN
- 12 WILLIAM BARNES
- 13 WILLIAM BARNES AS TRUSTEE OF BARNES FAMILY TRUST
- 14 JULIE BARNES
- 15 THOMAS BOOKMAN
- 16 JOHN CALANDRI FARMS
- 17 SON RISE FARMS
- 18 SAL CARDILE
- 19 CONNIE CARDILE
- 20 RAMIN ZOMORODI
- 21 GENZ DEVELOPMENT
- 22 CASTLE RANCH ESTATE
- 23 ALEKS BAHARLO
- 24 STEVEN GODDE
- 25 STEVEN AND LAWRENCE GODDE AS TRUSTEES OF FORREST GODDE TRUST
- 26 ROBERT GORRINDO
- 27 ROBERT GORRINDO AS TRUSTEE OF GORRINDO FAMILY TRUST
- 28 PHILLIP GORRINDO

- 1 LAURA GRIFFIN
- 2 LEONARD "LEN" GRIFFIN (DECEASED)
- 3 JANE HEALY
- 4 HEALY FARMS
- 5 HABOD (JOHN) JAVADI
- 6 ESPIE MEDELLIN
- 7 BRADLEY AND NINA MATSON
- 8 BILLIE J. DICKEY AND RANDALL DICKEY
- 9 HARLAN D. WILLIAMS, TRUSTEE
- 10 EVERT KEMPENAAR
- 11 VIKI KEMPENAAR
- 12 BARBARA BENCHOFF
- 13 CLEMENT (TOM) ORSOLANO
- 14 MARK W. BENZ AND NANCY L. BENZ
- 15 GLEN BRITTNER
- 16 GLEN BRITTNER AS TRUSTEE OF BRITTNER TRUST
- 17 JAMES BRIDWELL
- 18 ELIZABETH BRIDWELL
- 19 IRMA-ANN CARLE TRUST
- 20 EDDY CASTELLANOS
- 21 CANDACE M. CASTELLANOS
- 22 C. LOUISE CLOSE
- 23 R. CLOSE
- 24 JOSEPH DAVIS
- 25 DONNA PETTUS-DEVANS
- 26 RICHARD DENNING
- 27 ANTHONY DENNING/RAIRDEN
- 28 KATHRYN DENNING/RAIRDEN

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- 1 DOLAN FAMILY TRUST
- 2 MARGARET DOLAN, TRUSTEE OF DOLAN FAMILY TRUST
- 3 LAWRENCE DEAN EVANS
- 4 SUSAN EVANS
- 5 RUTH FINDLEY
- 6 LEAH FRANKENBERG
- 7 INGRID FULCHER
- 8 WALTER GRABE
- 9 NANCY GRABE
- 10 WESLEY GRAY
- 11 LOIS GRAY
- 12 ALETHA GROSSMAN
- 13 MARY LOUISE HOPKINS
- 14 FORROST WAYNE
- 15 JEAN INDART
- 16 JAMES LEER
- 17 DIANA LEER
- 18 KERRY LENSING
- 19 VALERIE LENSING
- 20 DENNIS MCWILLIAMS
- 21 DIANE MCWILLIAMS
- 22 KEITH MARKS
- 23 JUST MARKS
- 24 BRADLEY MATSON
- 25 NINA MATSON
- 26 LARRY MICK
- 27 JACK MILBURN
- 28 ,MARIANNE MILBURN

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EXHIBIT C

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2 CHARLTON WEEKS LLP
3 1031 West Avenue M-14, Suite A
4 Palmdale, CA 93551
5 (661) 265-0969

6 Attorney for Quartz Hill Water District
7 Defendant/Cross Complainant

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF LOS ANGELES-CENTRAL DISTRICT

10 ANTELOPE VALLEY GROUNDWATER
11 CASES

12 Included Actions:

13 Los Angeles County Waterworks District No.
14 40 v. Diamond Farming Co.
15 Superior Court of California, County of Los
16 Angeles, Case No. BC325201;

17 Los Angeles County Waterworks District
18 No. 40 v. Diamond Farming Co.
19 Superior Court of California
20 County of Kern, Case No. S-1500-CV-254-
21 348;

22 Wm. Bolthouse Farms, Inc. v. City of
23 Lancaster
24 Diamond Farming Co. v. City of Lancaster
25 Diamond Farming Co. v. Palmdale Water Dist.
26 Superior Court of California
27 County of Riverside, consolidated actions
28 Case Nos. RIC 353840, RIC 344436,
RIC 344668.

**Judicial Council Coordination Proceeding No.
4408**

Santa Clara Case No. 1-05-CV-049053
Assigned to the Honorable Jack Komar Dept. I

REQUESTS FOR ADMISSIONS (SET ONE)

25 PROPOUNDING PARTY: QUARTZ HILL WATER DISTRICT
26 RESPONDING PARTY: SEE EXHIBIT ONE
27 SET NO.: ONE
28

1 Pursuant to the provisions of Code of Civil Procedure §2033.010 you are hereby requested
2 to admit or deny the following matters under oath within thirty (30) days, which time may be
3 extended for service by mail as provided in the Code of Civil Procedure.

4
5 **Request for Admission Number 1.**

6 Admit YOU (YOU refers to the party responding to these requests) own no real property in the
7 BASIN (BASIN shall be defined as on and below the ground surface within the jurisdictional area
8 defined by the court in this matter by order dated March 16, 2007).

9
10 **Request for Admission Number 2.**

11 Admit YOU pump no groundwater in the BASIN.

12
13 **Request for Admission Number 3.**

14 Admit YOU use no groundwater in the BASIN.

15
16 **Request for Admission Number 4.**

17 Admit YOU use no water in the BASIN.

18
19 **Request for Admission Number 5**

20 Admit YOU (YOU refers to the party responding to these requests) have pumped no groundwater
21 from the BASIN (BASIN shall be defined as on and below the ground surface within the
22 jurisdictional area defined by the court in this matter by order dated March 16, 2007) since 1951.

23
24 **Request for Admission Number 6**

25 Admit YOU have used no groundwater from BASIN since 1951.

26
27 **Request for Admission Number 7**

28 Admit YOU have no water rights.

CHARLTON WEEKS LLP



Bradley T. Weeks

Attorney for Quartz Hill Water District

Dated: September 12, 2012

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- 1 Baxter Mutual Water Co.
- 2 Chavez, Efren
- 3 Granite Construction Company
- 4 Holliday Rock Co., Inc.
- 5 LITTLE ROCK SAND AND GRAVEL, INC.
- 6 Qarmout, Elias
- 7 Saint Andrew's Abbey, Inc., Roe 623
- 8 The Frank and Yvonne Lane Family Trust, Dated March 5, 1993 as Restated July 20, 2000
- 9 The George and Charlene Lane Family Trust
- 10 White Fence Farms Mutual Water No 3
- 11 GENE BAHLMAN
- 12 WILLIAM BARNES
- 13 WILLIAM BARNES AS TRUSTEE OF BARNES FAMILY TRUST
- 14 JULIE BARNES
- 15 THOMAS BOOKMAN
- 16 JOHN CALANDRI FARMS
- 17 SON RISE FARMS
- 18 SAL CARDILE
- 19 CONNIE CARDILE
- 20 RAMIN ZOMORODI
- 21 GENZ DEVELOPMENT
- 22 CASTLE RANCH ESTATE
- 23 ALEKS BAHARLO
- 24 STEVEN GODDE
- 25 STEVEN AND LAWRENCE GODDE AS TRUSTEES OF FORREST GODDE TRUST
- 26 ROBERT GORRINDO
- 27 ROBERT GORRINDO AS TRUSTEE OF GORRINDO FAMILY TRUST
- 28 PHILLIP GORRINDO

- 1 LAURA GRIFFIN
- 2 LEONARD "LEN" GRIFFIN (DECEASED)
- 3 JANE HEALY
- 4 HEALY FARMS
- 5 HABOD (JOHN) JAVADI
- 6 ESPIE MEDELLIN
- 7 BRADLEY AND NINA MATSON
- 8 BILLIE J. DICKEY AND RANDALL DICKEY
- 9 HARLAN D. WILLIAMS, TRUSTEE
- 10 EVERT KEMPENAAR
- 11 VIKI KEMPENAAR
- 12 BARBARA BENCHOFF
- 13 CLEMENT (TOM) ORSOLANO
- 14 MARK W. BENZ AND NANCY L. BENZ
- 15 GLEN BRITTNER
- 16 GLEN BRITTNER AS TRUSTEE OF BRITTNER TRUST
- 17 JAMES BRIDWELL
- 18 ELIZABETH BRIDWELL
- 19 IRMA-ANN CARLE TRUST
- 20 EDDY CASTELLANOS
- 21 CANDACE M. CASTELLANOS
- 22 C. LOUISE CLOSE
- 23 R. CLOSE
- 24 JOSEPH DAVIS
- 25 DONNA PETTUS-DEVANS
- 26 RICHARD DENNING
- 27 ANTHONY DENNING/RAIRDEN
- 28 KATHRYN DENNING/RAIRDEN

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- 1 DOLAN FAMILY TRUST
- 2 MARGARET DOLAN, TRUSTEE OF DOLAN FAMILY TRUST
- 3 LAWRENCE DEAN EVANS
- 4 SUSAN EVANS
- 5 RUTH FINDLEY
- 6 LEAH FRANKENBERG
- 7 INGRID FULCHER
- 8 WALTER GRABE
- 9 NANCY GRABE
- 10 WESLEY GRAY
- 11 LOIS GRAY
- 12 ALETHA GROSSMAN
- 13 MARY LOUISE HOPKINS
- 14 FORROST WAYNE
- 15 JEAN INDART
- 16 JAMES LEER
- 17 DIANA LEER
- 18 KERRY LENSING
- 19 VALERIE LENSING
- 20 DENNIS MCWILLIAMS
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- 23 JUST MARKS
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EXHIBIT D

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Bradley T. Weeks (Bar # 173745) Charlton Weeks LLP 1031 West Avenue M-14, Suite A Palmdale, CA 93551 TELEPHONE NO.: (661) 265-0969 FAX NO. (Optional): (661) 265-1650 E-MAIL ADDRESS (Optional): brad@charltonweeks.com ATTORNEY FOR (Name): Quartz Hill Water District	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES	
SHORT TITLE OF CASE: <p style="text-align: center;">ANTELOPE VALLEY GROUNDWATER CASES</p>	
<p style="text-align: center;">FORM INTERROGATORIES—GENERAL</p> Asking Party: Quartz Hill Water District Answering Party: See Exhibit One Set No.: One	CASE NUMBER: <p style="text-align: center;">Judicial Council Coordination Proceeding No. 4408</p>

Sec. 1. Instructions to All Parties

- (a) Interrogatories are written questions prepared by a party to an action that are sent to any other party in the action to be answered under oath. The interrogatories below are form interrogatories approved for use in civil cases.
- (b) For time limitations, requirements for service on other parties, and other details, see Code of Civil Procedure sections 2030.010–2030.410 and the cases construing those sections.
- (c) These form interrogatories do not change existing law relating to interrogatories nor do they affect an answering party's right to assert any privilege or make any objection.

Sec. 2. Instructions to the Asking Party

- (a) These interrogatories are designed for optional use by parties in unlimited civil cases where the amount demanded exceeds \$25,000. Separate interrogatories, Form *Interrogatories—Limited Civil Cases (Economic Litigation)* (form DISC-004), which have no subparts, are designed for use in limited civil cases where the amount demanded is \$25,000 or less; however, those interrogatories may also be used in unlimited civil cases.
- (b) Check the box next to each interrogatory that you want the answering party to answer. Use care in choosing those interrogatories that are applicable to the case.
- (c) You may insert your own definition of **INCIDENT** in Section 4, but only where the action arises from a course of conduct or a series of events occurring over a period of time.
- (d) The interrogatories in section 16.0, Defendant's Contentions—Personal Injury, should not be used until the defendant has had a reasonable opportunity to conduct an investigation or discovery of plaintiff's injuries and damages.
- (e) Additional interrogatories may be attached.

Sec. 3. Instructions to the Answering Party

- (a) An answer or other appropriate response must be given to each interrogatory checked by the asking party.
- (b) As a general rule, within 30 days after you are served with these interrogatories, you must serve your responses on the asking party and serve copies of your responses on all other parties to the action who have appeared. See Code of Civil Procedure sections 2030.260–2030.270 for details.

- (c) Each answer must be as complete and straightforward as the information reasonably available to you, including the information possessed by your attorneys or agents, permits. If an interrogatory cannot be answered completely, answer it to the extent possible.
- (d) If you do not have enough personal knowledge to fully answer an interrogatory, say so, but make a reasonable and good faith effort to get the information by asking other persons or organizations, unless the information is equally available to the asking party.
- (e) Whenever an interrogatory may be answered by referring to a document, the document may be attached as an exhibit to the response and referred to in the response. If the document has more than one page, refer to the page and section where the answer to the interrogatory can be found.
- (f) Whenever an address and telephone number for the same person are requested in more than one interrogatory, you are required to furnish them in answering only the first interrogatory asking for that information.
- (g) If you are asserting a privilege or making an objection to an interrogatory, you must specifically assert the privilege or state the objection in your written response.
- (h) Your answers to these interrogatories must be verified, dated, and signed. You may wish to use the following form at the end of your answers:

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

(DATE)

(SIGNATURE)

Sec. 4. Definitions

Words in **BOLDFACE CAPITALS** in these interrogatories are defined as follows:

(a) (Check one of the following):

- (1) **INCIDENT** includes the circumstances and events surrounding the alleged accident, injury, or other occurrence or breach of contract giving rise to this action or proceeding.

(2) **INCIDENT** means (insert your definition here or on a separate, attached sheet labeled "Sec. 4(a)(2)"): _____

(b) **YOU OR ANYONE ACTING ON YOUR BEHALF** includes you, your agents, your employees, your insurance companies, their agents, their employees, your attorneys, your accountants, your investigators, and anyone else acting on your behalf.

(c) **PERSON** includes a natural person, firm, association, organization, partnership, business, trust, limited liability company, corporation, or public entity.

(d) **DOCUMENT** means a writing, as defined in Evidence Code section 250, and includes the original or a copy of handwriting, typewriting, printing, photostats, photographs, electronically stored information, and every other means of recording upon any tangible thing and form of communicating or representation, including letters, words, pictures, sounds, or symbols, or combinations of them.

(e) **HEALTH CARE PROVIDER** includes any **PERSON** referred to in Code of Civil Procedure section 667.7(e)(3).

(f) **ADDRESS** means the street address, including the city, state, and zip code.

Sec. 5. Interrogatories

The following interrogatories have been approved by the Judicial Council under Code of Civil Procedure section 2033.710:

CONTENTS

- 1.0 Identity of Persons Answering These Interrogatories
- 2.0 General Background Information—Individual
- 3.0 General Background Information—Business Entity
- 4.0 Insurance
- 5.0 [Reserved]
- 6.0 Physical, Mental, or Emotional Injuries
- 7.0 Property Damage
- 8.0 Loss of Income or Earning Capacity
- 9.0 Other Damages
- 10.0 Medical History
- 11.0 Other Claims and Previous Claims
- 12.0 Investigation—General
- 13.0 Investigation—Surveillance
- 14.0 Statutory or Regulatory Violations
- 15.0 Denials and Special or Affirmative Defenses
- 16.0 Defendant's Contentions Personal Injury
- 17.0 Responses to Request for Admissions
- 18.0 [Reserved]
- 19.0 [Reserved]
- 20.0 How the Incident Occurred—Motor Vehicle
- 25.0 [Reserved]
- 30.0 [Reserved]
- 40.0 [Reserved]
- 50.0 Contract
- 60.0 [Reserved]
- 70.0 Unlawful Detainer [See separate form DISC-003]
- 101.0 Economic Litigation [See separate form DISC-004]
- 200.0 Employment Law [See separate form DISC-002]
- Family Law [See separate form FL-145]

1.0 Identity of Persons Answering These Interrogatories

1.1 State the name, **ADDRESS**, telephone number, and relationship to you of each **PERSON** who prepared or assisted in the preparation of the responses to these interrogatories. (Do not identify anyone who simply typed or reproduced the responses.)

2.0 General Background Information—individual

2.1 State:
 (a) your name;
 (b) every name you have used in the past; and
 (c) the dates you used each name.

2.2 State the date and place of your birth.

2.3 At the time of the **INCIDENT**, did you have a driver's license? If so state:
 (a) the state or other issuing entity;
 (b) the license number and type;
 (c) the date of issuance; and
 (d) all restrictions.

2.4 At the time of the **INCIDENT**, did you have any other permit or license for the operation of a motor vehicle? If so, state:
 (a) the state or other issuing entity;
 (b) the license number and type;
 (c) the date of issuance; and
 (d) all restrictions.

2.5 State:
 (a) your present residence **ADDRESS**;
 (b) your residence **ADDRESSES** for the past five years; and
 (c) the dates you lived at each **ADDRESS**.

2.6 State:
 (a) the name, **ADDRESS**, and telephone number of your present employer or place of self-employment; and
 (b) the name, **ADDRESS**, dates of employment, job title, and nature of work for each employer or self-employment you have had from five years before the **INCIDENT** until today.

2.7 State:
 (a) the name and **ADDRESS** of each school or other academic or vocational institution you have attended, beginning with high school;
 (b) the dates you attended;
 (c) the highest grade level you have completed; and
 (d) the degrees received.

2.8 Have you ever been convicted of a felony? If so, for each conviction state:
 (a) the city and state where you were convicted;
 (b) the date of conviction;
 (c) the offense; and
 (d) the court and case number.

2.9 Can you speak English with ease? If not, what language and dialect do you normally use?

2.10 Can you read and write English with ease? If not, what language and dialect do you normally use?

- 2.11 At the time of the **INCIDENT** were you acting as an agent or employee for any **PERSON**? If so, state:
- the name, **ADDRESS**, and telephone number of that **PERSON**; and
 - a description of your duties.
- 2.12 At the time of the **INCIDENT** did you or any other person have any physical, emotional, or mental disability or condition that may have contributed to the occurrence of the **INCIDENT**? If so, for each person state:
- the name, **ADDRESS**, and telephone number;
 - the nature of the disability or condition; and
 - the manner in which the disability or condition contributed to the occurrence of the **INCIDENT**.
- 2.13 Within 24 hours before the **INCIDENT** did you or any person involved in the **INCIDENT** use or take any of the following substances: alcoholic beverage, marijuana, or other drug or medication of any kind (prescription or not)? If so, for each person state:
- the name, **ADDRESS**, and telephone number;
 - the nature or description of each substance;
 - the quantity of each substance used or taken;
 - the date and time of day when each substance was used or taken;
 - the **ADDRESS** where each substance was used or taken;
 - the name, **ADDRESS**, and telephone number of each person who was present when each substance was used or taken; and
 - the name, **ADDRESS**, and telephone number of any **HEALTH CARE PROVIDER** who prescribed or furnished the substance and the condition for which it was prescribed or furnished.

3.0 General Background Information—Business Entity

- 3.1 Are you a corporation? If so, state:
- the name stated in the current articles of incorporation;
 - all other names used by the corporation during the past 10 years and the dates each was used;
 - the date and place of incorporation;
 - the **ADDRESS** of the principal place of business; and
 - whether you are qualified to do business in California.
- 3.2 Are you a partnership? If so, state:
- the current partnership name;
 - all other names used by the partnership during the past 10 years and the dates each was used;
 - whether you are a limited partnership and, if so, under the laws of what jurisdiction;
 - the name and **ADDRESS** of each general partner; and
 - the **ADDRESS** of the principal place of business.
- 3.3 Are you a limited liability company? If so, state:
- the name stated in the current articles of organization;
 - all other names used by the company during the past 10 years and the date each was used;
 - the date and place of filing of the articles of organization;
 - the **ADDRESS** of the principal place of business; and
 - whether you are qualified to do business in California.

- 3.4 Are you a joint venture? If so, state:
- the current joint venture name;
 - all other names used by the joint venture during the past 10 years and the dates each was used;
 - the name and **ADDRESS** of each joint venturer; and
 - the **ADDRESS** of the principal place of business.
- 3.5 Are you an unincorporated association? If so, state:
- the current unincorporated association name;
 - all other names used by the unincorporated association during the past 10 years and the dates each was used; and
 - the **ADDRESS** of the principal place of business.
- 3.6 Have you done business under a fictitious name during the past 10 years? If so, for each fictitious name state:
- the name;
 - the dates each was used;
 - the state and county of each fictitious name filing; and
 - the **ADDRESS** of the principal place of business.
- 3.7 Within the past five years has any public entity registered or licensed your business? If so, for each license or registration:
- identify the license or registration;
 - state the name of the public entity; and
 - state the dates of issuance and expiration.

4.0 Insurance

- 4.1 At the time of the **INCIDENT**, was there in effect any policy of insurance through which you were or might be insured in any manner (for example, primary, pro-rata, or excess liability coverage or medical expense coverage) for the damages, claims, or actions that have arisen out of the **INCIDENT**? If so, for each policy state:
- the kind of coverage;
 - the name and **ADDRESS** of the insurance company;
 - the name, **ADDRESS**, and telephone number of each named insured;
 - the policy number;
 - the limits of coverage for each type of coverage contained in the policy;
 - whether any reservation of rights or controversy or coverage dispute exists between you and the insurance company; and
 - the name, **ADDRESS**, and telephone number of the custodian of the policy.
- 4.2 Are you self-insured under any statute for the damages, claims, or actions that have arisen out of the **INCIDENT**? If so, specify the statute.

5.0 [Reserved]

6.0 Physical, Mental, or Emotional Injuries

- 6.1 Do you attribute any physical, mental, or emotional injuries to the **INCIDENT**? (If your answer is "no," do not answer interrogatories 6.2 through 6.7).
- 6.2 Identify each injury you attribute to the **INCIDENT** and the area of your body affected.

6.3 Do you still have any complaints that you attribute to the **INCIDENT**? If so, for each complaint state:

- (a) a description;
- (b) whether the complaint is subsiding, remaining the same, or becoming worse; and
- (c) the frequency and duration.

6.4 Did you receive any consultation or examination (except from expert witnesses covered by Code of Civil Procedure sections 2034.210–2034.310) or treatment from a **HEALTH CARE PROVIDER** for any injury you attribute to the **INCIDENT**? If so, for each **HEALTH CARE PROVIDER** state:

- (a) the name, **ADDRESS**, and telephone number;
- (b) the type of consultation, examination, or treatment provided;
- (c) the dates you received consultation, examination, or treatment; and
- (d) the charges to date.

6.5 Have you taken any medication, prescribed or not, as a result of injuries that you attribute to the **INCIDENT**? If so, for each medication state:

- (a) the name;
- (b) the **PERSON** who prescribed or furnished it;
- (c) the date it was prescribed or furnished;
- (d) the dates you began and stopped taking it; and
- (e) the cost to date.

6.6 Are there any other medical services necessitated by the injuries that you attribute to the **INCIDENT** that were not previously listed (for example, ambulance, nursing, prosthetics)? If so, for each service state:

- (a) the nature;
- (b) the date;
- (c) the cost; and
- (d) the name, **ADDRESS**, and telephone number of each provider.

6.7 Has any **HEALTH CARE PROVIDER** advised that you may require future or additional treatment for any injuries that you attribute to the **INCIDENT**? If so, for each injury state:

- (a) the name and **ADDRESS** of each **HEALTH CARE PROVIDER**;
- (b) the complaints for which the treatment was advised; and
- (c) the nature, duration, and estimated cost of the treatment.

7.0 Property Damage

7.1 Do you attribute any loss of or damage to a vehicle or other property to the **INCIDENT**? If so, for each item of property:

- (a) describe the property;
- (b) describe the nature and location of the damage to the property;

- (c) state the amount of damage you are claiming for each item of property and how the amount was calculated; and
- (d) if the property was sold, state the name, **ADDRESS**, and telephone number of the seller, the date of sale, and the sale price.

7.2 Has a written estimate or evaluation been made for any item of property referred to in your answer to the preceding interrogatory? If so, for each estimate or evaluation state:

- (a) the name, **ADDRESS**, and telephone number of the **PERSON** who prepared it and the date prepared;
- (b) the name, **ADDRESS**, and telephone number of each **PERSON** who has a copy of it; and
- (c) the amount of damage stated.

7.3 Has any item of property referred to in your answer to interrogatory 7.1 been repaired? If so, for each item state:

- (a) the date repaired;
- (b) a description of the repair;
- (c) the repair cost;
- (d) the name, **ADDRESS**, and telephone number of the **PERSON** who repaired it;
- (e) the name, **ADDRESS**, and telephone number of the **PERSON** who paid for the repair.

8.0 Loss of Income or Earning Capacity

8.1 Do you attribute any loss of income or earning capacity to the **INCIDENT**? (If your answer is "no," do not answer interrogatories 8.2 through 8.8).

8.2 State:

- (a) the nature of your work;
- (b) your job title at the time of the **INCIDENT**; and
- (c) the date your employment began.

8.3 State the last date before the **INCIDENT** that you worked for compensation.

8.4 State your monthly income at the time of the **INCIDENT** and how the amount was calculated.

8.5 State the date you returned to work at each place of employment following the **INCIDENT**.

8.6 State the dates you did not work and for which you lost income as a result of the **INCIDENT**.

8.7 State the total income you have lost to date as a result of the **INCIDENT** and how the amount was calculated.

8.8 Will you lose income in the future as a result of the **INCIDENT**? If so, state:

- (a) the facts upon which you base this contention;
- (b) an estimate of the amount;
- (c) an estimate of how long you will be unable to work; and
- (d) how the claim for future income is calculated.

9.0 Other Damages

- 9.1 Are there any other damages that you attribute to the **INCIDENT**? If so, for each item of damage state:
- the nature;
 - the date it occurred;
 - the amount; and
 - the name, **ADDRESS**, and telephone number of each **PERSON** to whom an obligation was incurred.
- 9.2 Do any **DOCUMENTS** support the existence or amount of any item of damages claimed in interrogatory 9.1? If so, describe each document and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT**.

10.0 Medical History

- 10.1 At any time before the **INCIDENT** did you have complaints or injuries that involved the same part of your body claimed to have been injured in the **INCIDENT**? If so, for each state:
- a description of the complaint or injury;
 - the dates it began and ended; and
 - the name, **ADDRESS**, and telephone number of each **HEALTH CARE PROVIDER** whom you consulted or who examined or treated you.
- 10.2 List all physical, mental, and emotional disabilities you had immediately before the **INCIDENT**. (*You may omit mental or emotional disabilities unless you attribute any mental or emotional injury to the **INCIDENT**.*)
- 10.3 At any time after the **INCIDENT**, did you sustain injuries of the kind for which you are now claiming damages? If so, for each incident giving rise to an injury state:
- the date and the place it occurred;
 - the name, **ADDRESS**, and telephone number of any other **PERSON** involved;
 - the nature of any injuries you sustained;
 - the name, **ADDRESS**, and telephone number of each **HEALTH CARE PROVIDER** who you consulted or who examined or treated you; and
 - the nature of the treatment and its duration.

11.0 Other Claims and Previous Claims

- 11.1 Except for this action, in the past 10 years have you filed an action or made a written claim or demand for compensation for your personal injuries? If so, for each action, claim, or demand state:
- the date, time, and place and location (closest street **ADDRESS** or intersection) of the **INCIDENT** giving rise to the action, claim, or demand;
 - the name, **ADDRESS**, and telephone number of each **PERSON** against whom the claim or demand was made or the action filed;

- the court, names of the parties, and case number of any action filed;
- the name, **ADDRESS**, and telephone number of any attorney representing you;
- whether the claim or action has been resolved or is pending; and
- a description of the injury.

- 11.2 In the past 10 years have you made a written claim or demand for workers' compensation benefits? If so, for each claim or demand state:
- the date, time, and place of the **INCIDENT** giving rise to the claim;
 - the name, **ADDRESS**, and telephone number of your employer at the time of the injury;
 - the name, **ADDRESS**, and telephone number of the workers' compensation insurer and the claim number;
 - the period of time during which you received workers' compensation benefits;
 - a description of the injury;
 - the name, **ADDRESS**, and telephone number of any **HEALTH CARE PROVIDER** who provided services; and
 - the case number at the Workers' Compensation Appeals Board.

12.0 Investigation—General

- 12.1 State the name, **ADDRESS**, and telephone number of each individual:
- who witnessed the **INCIDENT** or the events occurring immediately before or after the **INCIDENT**;
 - who made any statement at the scene of the **INCIDENT**;
 - who heard any statements made about the **INCIDENT** by any individual at the scene; and
 - who **YOU OR ANYONE ACTING ON YOUR BEHALF** claim has knowledge of the **INCIDENT** (except for expert witnesses covered by Code of Civil Procedure section 2034).
- 12.2 Have **YOU OR ANYONE ACTING ON YOUR BEHALF** interviewed any individual concerning the **INCIDENT**? If so, for each individual state:
- the name, **ADDRESS**, and telephone number of the individual interviewed;
 - the date of the interview; and
 - the name, **ADDRESS**, and telephone number of the **PERSON** who conducted the interview.
- 12.3 Have **YOU OR ANYONE ACTING ON YOUR BEHALF** obtained a written or recorded statement from any individual concerning the **INCIDENT**? If so, for each statement state:
- the name, **ADDRESS**, and telephone number of the individual from whom the statement was obtained;
 - the name, **ADDRESS**, and telephone number of the individual who obtained the statement;
 - the date the statement was obtained; and
 - the name, **ADDRESS**, and telephone number of each **PERSON** who has the original statement or a copy.

- 12.4 Do **YOU OR ANYONE ACTING ON YOUR BEHALF** know of any photographs, films, or videotapes depicting any place, object, or individual concerning the **INCIDENT** or plaintiff's injuries? If so, state:
- the number of photographs or feet of film or videotape;
 - the places, objects, or persons photographed, filmed, or videotaped;
 - the date the photographs, films, or videotapes were taken;
 - the name, **ADDRESS**, and telephone number of the individual taking the photographs, films, or videotapes; and
 - the name, **ADDRESS**, and telephone number of each **PERSON** who has the original or a copy of the photographs, films, or videotapes.

- 12.5 Do **YOU OR ANYONE ACTING ON YOUR BEHALF** know of any diagram, reproduction, or model of any place or thing (except for items developed by expert witnesses covered by Code of Civil Procedure sections 2034.210–2034.310) concerning the **INCIDENT**? If so, for each item state:
- the type (i.e., diagram, reproduction, or model);
 - the subject matter; and
 - the name, **ADDRESS**, and telephone number of each **PERSON** who has it.

- 12.6 Was a report made by any **PERSON** concerning the **INCIDENT**? If so, state:
- the name, title, identification number, and employer of the **PERSON** who made the report;
 - the date and type of report made;
 - the name, **ADDRESS**, and telephone number of the **PERSON** for whom the report was made; and
 - the name, **ADDRESS**, and telephone number of each **PERSON** who has the original or a copy of the report.

- 12.7 Have **YOU OR ANYONE ACTING ON YOUR BEHALF** inspected the scene of the **INCIDENT**? If so, for each inspection state:
- the name, **ADDRESS**, and telephone number of the individual making the inspection (except for expert witnesses covered by Code of Civil Procedure sections 2034.210–2034.310); and
 - the date of the inspection.

13.0 Investigation—Surveillance

- 13.1 Have **YOU OR ANYONE ACTING ON YOUR BEHALF** conducted surveillance of any individual involved in the **INCIDENT** or any party to this action? If so, for each surveillance state:
- the name, **ADDRESS**, and telephone number of the individual or party;
 - the time, date, and place of the surveillance;
 - the name, **ADDRESS**, and telephone number of the individual who conducted the surveillance; and
 - the name, **ADDRESS**, and telephone number of each **PERSON** who has the original or a copy of any surveillance photograph, film, or videotape.

- 13.2 Has a written report been prepared on the surveillance? If so, for each written report state:
- the title;
 - the date;
 - the name, **ADDRESS**, and telephone number of the individual who prepared the report; and
 - the name, **ADDRESS**, and telephone number of each **PERSON** who has the original or a copy.

14.0 Statutory or Regulatory Violations

- 14.1 Do **YOU OR ANYONE ACTING ON YOUR BEHALF** contend that any **PERSON** involved in the **INCIDENT** violated any statute, ordinance, or regulation and that the violation was a legal (proximate) cause of the **INCIDENT**? If so, identify the name, **ADDRESS**, and telephone number of each **PERSON** and the statute, ordinance, or regulation that was violated.
- 14.2 Was any **PERSON** cited or charged with a violation of any statute, ordinance, or regulation as a result of this **INCIDENT**? If so, for each **PERSON** state:
- the name, **ADDRESS**, and telephone number of the **PERSON**;
 - the statute, ordinance, or regulation allegedly violated;
 - whether the **PERSON** entered a plea in response to the citation or charge and, if so, the plea entered; and
 - the name and **ADDRESS** of the court or administrative agency, names of the parties, and case number.

15.0 Denials and Special or Affirmative Defenses

- 15.1 Identify each denial of a material allegation and each special or affirmative defense in your pleadings and for each:
- state all facts upon which you base the denial or special or affirmative defense;
 - state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of those facts; and
 - identify all **DOCUMENTS** and other tangible things that support your denial or special or affirmative defense, and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT**.

16.0 Defendant's Contentions—Personal Injury

- 16.1 Do you contend that any **PERSON**, other than you or plaintiff, contributed to the occurrence of the **INCIDENT** or the injuries or damages claimed by plaintiff? If so, for each **PERSON**:
- state the name, **ADDRESS**, and telephone number of the **PERSON**;
 - state all facts upon which you base your contention;
 - state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
 - identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.
- 16.2 Do you contend that plaintiff was not injured in the **INCIDENT**? If so:
- state all facts upon which you base your contention;
 - state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
 - identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

- 16.3 Do you contend that the injuries or the extent of the injuries claimed by plaintiff as disclosed in discovery proceedings thus far in this case were not caused by the **INCIDENT**? If so, for each injury:
- identify it;
 - state all facts upon which you base your contention;
 - state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
 - identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.
- 16.4 Do you contend that any of the services furnished by any **HEALTH CARE PROVIDER** claimed by plaintiff in discovery proceedings thus far in this case were not due to the **INCIDENT**? If so:
- identify each service;
 - state all facts upon which you base your contention;
 - state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
 - identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.
- 16.5 Do you contend that any of the costs of services furnished by any **HEALTH CARE PROVIDER** claimed as damages by plaintiff in discovery proceedings thus far in this case were not necessary or unreasonable? If so:
- identify each cost;
 - state all facts upon which you base your contention;
 - state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
 - identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.
- 16.6 Do you contend that any part of the loss of earnings or income claimed by plaintiff in discovery proceedings thus far in this case was unreasonable or was not caused by the **INCIDENT**? If so:
- identify each part of the loss;
 - state all facts upon which you base your contention;
 - state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
 - identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.
- 16.7 Do you contend that any of the property damage claimed by plaintiff in discovery Proceedings thus far in this case was not caused by the **INCIDENT**? If so:
- identify each item of property damage;
 - state all facts upon which you base your contention;
 - state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
 - identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.
- 16.8 Do you contend that any of the costs of repairing the property damage claimed by plaintiff in discovery proceedings thus far in this case were unreasonable? If so:
- identify each cost item;
 - state all facts upon which you base your contention;
 - state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
 - identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.
- 16.9 Do **YOU OR ANYONE ACTING ON YOUR BEHALF** have any **DOCUMENT** (for example, insurance bureau index reports) concerning claims for personal injuries made before or after the **INCIDENT** by a plaintiff in this case? If so, for each plaintiff state:
- the source of each **DOCUMENT**;
 - the date each claim arose;
 - the nature of each claim; and
 - the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT**.
- 16.10 Do **YOU OR ANYONE ACTING ON YOUR BEHALF** have any **DOCUMENT** concerning the past or present physical, mental, or emotional condition of any plaintiff in this case from a **HEALTH CARE PROVIDER** not previously identified (except for expert witnesses covered by Code of Civil Procedure sections 2034.210-2034.310)? If so, for each plaintiff state:
- the name, **ADDRESS**, and telephone number of each **HEALTH CARE PROVIDER**;
 - a description of each **DOCUMENT**; and
 - the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT**.
- 17.0 Responses to Request for Admissions**
- 17.1 Is your response to each request for admission served with these interrogatories an unqualified admission? If not, for each response that is not an unqualified admission:
- state the number of the request;
 - state all facts upon which you base your response;
 - state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of those facts; and
 - identify all **DOCUMENTS** and other tangible things that support your response and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.
- 18.0 [Reserved]**
- 19.0 [Reserved]**
- 20.0 How the Incident Occurred—Motor Vehicle**
- 20.1 State the date, time, and place of the **INCIDENT** (closest street **ADDRESS** or intersection).
- 20.2 For each vehicle involved in the **INCIDENT**, state:
- the year, make, model, and license number;
 - the name, **ADDRESS**, and telephone number of the driver;

- (c) the name, **ADDRESS**, and telephone number of each occupant other than the driver;
- (d) the name, **ADDRESS**, and telephone number of each registered owner;
- (e) the name, **ADDRESS**, and telephone number of each lessee;
- (f) the name, **ADDRESS**, and telephone number of each owner other than the registered owner or lien holder; and
- (g) the name of each owner who gave permission or consent to the driver to operate the vehicle.
- 20.3 State the **ADDRESS** and location where your trip began and the **ADDRESS** and location of your destination.
- 20.4 Describe the route that you followed from the beginning of your trip to the location of the **INCIDENT**, and state the location of each stop, other than routine traffic stops, during the trip leading up to the **INCIDENT**.
- 20.5 State the name of the street or roadway, the lane of travel, and the direction of travel of each vehicle involved in the **INCIDENT** for the 500 feet of travel before the **INCIDENT**.
- 20.6 Did the **INCIDENT** occur at an intersection? If so, describe all traffic control devices, signals, or signs at the intersection.
- 20.7 Was there a traffic signal facing you at the time of the **INCIDENT**? If so, state:
- (a) your location when you first saw it;
- (b) the color;
- (c) the number of seconds it had been that color; and
- (d) whether the color changed between the time you first saw it and the **INCIDENT**.
- 20.8 State how the **INCIDENT** occurred, giving the speed, direction, and location of each vehicle involved:
- (a) just before the **INCIDENT**;
- (b) at the time of the **INCIDENT**; and (c) just after the **INCIDENT**.
- 20.9 Do you have information that a malfunction or defect in a vehicle caused the **INCIDENT**? If so:
- (a) identify the vehicle;
- (b) identify each malfunction or defect;
- (c) state the name, **ADDRESS**, and telephone number of each **PERSON** who is a witness to or has information about each malfunction or defect; and
- (d) state the name, **ADDRESS**, and telephone number of each **PERSON** who has custody of each defective part.
- 20.10 Do you have information that any malfunction or defect in a vehicle contributed to the injuries sustained in the **INCIDENT**? If so:
- (a) identify the vehicle;
- (b) identify each malfunction or defect;
- (c) state the name, **ADDRESS**, and telephone number of each **PERSON** who is a witness to or has information about each malfunction or defect; and
- (d) state the name, **ADDRESS**, and telephone number of each **PERSON** who has custody of each defective part.
- 20.11 State the name, **ADDRESS**, and telephone number of each owner and each **PERSON** who has had possession since the **INCIDENT** of each vehicle involved in the **INCIDENT**.
- 25.0 [Reserved]
- 30.0 [Reserved]
- 40.0 [Reserved]
- 50.0 Contract
- 50.1 For each agreement alleged in the pleadings:
- (a) identify each **DOCUMENT** that is part of the agreement and for each state the name, **ADDRESS**, and telephone number of each **PERSON** who has the **DOCUMENT**;
- (b) state each part of the agreement not in writing, the name, **ADDRESS**, and telephone number of each **PERSON** agreeing to that provision, and the date that part of the agreement was made;
- (c) identify all **DOCUMENTS** that evidence any part of the agreement not in writing and for each state the name, **ADDRESS**, and telephone number of each **PERSON** who has the **DOCUMENT**;
- (d) identify all **DOCUMENTS** that are part of any modification to the agreement, and for each state the name, **ADDRESS**, and telephone number of each **PERSON** who has the **DOCUMENT**;
- (e) state each modification not in writing, the date, and the name, **ADDRESS**, and telephone number of each **PERSON** agreeing to the modification, and the date the modification was made;
- (f) identify all **DOCUMENTS** that evidence any modification of the agreement not in writing and for each state the name, **ADDRESS**, and telephone number of each **PERSON** who has the **DOCUMENT**.
- 50.2 Was there a breach of any agreement alleged in the pleadings? If so, for each breach describe and give the date of every act or omission that you claim is the breach of the agreement.
- 50.3 Was performance of any agreement alleged in the pleadings excused? If so, identify each agreement excused and state why performance was excused.
- 50.4 Was any agreement alleged in the pleadings terminated by mutual agreement, release, accord and satisfaction, or novation? If so, identify each agreement terminated, the date of termination, and the basis of the termination.
- 50.5 Is any agreement alleged in the pleadings unenforceable? If so, identify each unenforceable agreement and state why it is unenforceable.
- 50.6 Is any agreement alleged in the pleadings ambiguous? If so, identify each ambiguous agreement and state why it is ambiguous.
- 60.0 [Reserved]

- 1 Baxter Mutual Water Co.
- 2 Chavez, Efren
- 3 Granite Construction Company
- 4 Holliday Rock Co., Inc.
- 5 LITTLE ROCK SAND AND GRAVEL, INC.
- 6 Qarmout, Elias
- 7 Saint Andrew's Abbey, Inc., Roe 623
- 8 The Frank and Yvonne Lane Family Trust, Dated March 5, 1993 as Restated July 20, 2000
- 9 The George and Charlene Lane Family Trust
- 10 White Fence Farms Mutual Water No 3
- 11 GENE BAHLMAN
- 12 WILLIAM BARNES
- 13 WILLIAM BARNES AS TRUSTEE OF BARNES FAMILY TRUST
- 14 JULIE BARNES
- 15 THOMAS BOOKMAN
- 16 JOHN CALANDRI FARMS
- 17 SON RISE FARMS
- 18 SAL CARDILE
- 19 CONNIE CARDILE
- 20 RAMIN ZOMORODI
- 21 GENZ DEVELOPMENT
- 22 CASTLE RANCH ESTATE
- 23 ALEKS BAHARLO
- 24 STEVEN GODDE
- 25 STEVEN AND LAWRENCE GODDE AS TRUSTEES OF FORREST GODDE TRUST
- 26 ROBERT GORRINDO
- 27 ROBERT GORRINDO AS TRUSTEE OF GORRINDO FAMILY TRUST
- 28 PHILLIP GORRINDO

- 1 LAURA GRIFFIN
- 2 LEONARD "LEN" GRIFFIN (DECEASED)
- 3 JANE HEALY
- 4 HEALY FARMS
- 5 HABOD (JOHN) JAVADI
- 6 ESPIE MEDELLIN
- 7 BRADLEY AND NINA MATSON
- 8 BILLIE J. DICKEY AND RANDALL DICKEY
- 9 HARLAN D. WILLIAMS, TRUSTEE
- 10 EVERT KEMPENAAR
- 11 VIKI KEMPENAAR
- 12 BARBARA BENCHOFF
- 13 CLEMENT (TOM) ORSOLOANO
- 14 MARK W. BENZ AND NANCY L. BENZ
- 15 GLEN BRITTNER
- 16 GLEN BRITTNER AS TRUSTEE OF BRITTNER TRUST
- 17 JAMES BRIDWELL
- 18 ELIZABETH BRIDWELL
- 19 IRMA-ANN CARLE TRUST
- 20 EDDY CASTELLANOS
- 21 CANDACE M. CASTELLANOS
- 22 C. LOUISE CLOSE
- 23 R. CLOSE
- 24 JOSEPH DAVIS
- 25 DONNA PETTUS-DEVANS
- 26 RICHARD DENNING
- 27 ANTHONY DENNING/RAIRDEN
- 28 KATHRYN DENNING/RAIRDEN

- 1 DOLAN FAMILY TRUST
- 2 MARGARET DOLAN, TRUSTEE OF DOLAN FAMILY TRUST
- 3 LAWRENCE DEAN EVANS
- 4 SUSAN EVANS
- 5 RUTH FINDLEY
- 6 LEAH FRANKENBERG
- 7 INGRID FULCHER
- 8 WALTER GRABE
- 9 NANCY GRABE
- 10 WESLEY GRAY
- 11 LOIS GRAY
- 12 ALETHA GROSSMAN
- 13 MARY LOUISE HOPKINS
- 14 FORROST WAYNE
- 15 JEAN INDART
- 16 JAMES LEER
- 17 DIANA LEER
- 18 KERRY LENSING
- 19 VALERIE LENSING
- 20 DENNIS MCWILLIAMS
- 21 DIANE MCWILLIAMS
- 22 KEITH MARKS
- 23 JUST MARKS
- 24 BRADLEY MATSON
- 25 NINA MATSON
- 26 LARRY MICK
- 27 JACK MILBURN
- 28 ,MARIANNE MILBURN

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Palmdale, CA 93551

- 1 ADELE MILBURN
- 2 MILBURN FAMILY TRUST
- 3 LYMAN MOMENY
- 4 MARILYN MOMENY
- 5 CHESTER OLIN
- 6 MARIANNE OLIN
- 7 ANDREW OLSON
- 8 KALIE VAN METER
- 9 RICHARD PASSMORE, JR.
- 10 VANCE POMEROY
- 11 KIMBERELY POMEROY
- 12 JOHN POSTON
- 13 PATRICIA POSTON
- 14 DIANA RODNEY
- 15 SUZANNE RICHTER
- 16 RAFAEL ROMERO
- 17 MARTIWIANA SANDOVAL
- 18 LAWRENCE SCHILLING
- 19 MARY SCHILLING
- 20 LORRAINE SHONE
- 21 JACK SIMENSEN
- 22 BARBARA SIMENSEN
- 23 RONALD SUGAJSKI
- 24 SHARON SUGAJSKI
- 25 GLENN TAYLOR
- 26 RUDOLP TURK
- 27 RULOP TURK AS TRUSTEE OF TURK TRUST
- 28 PAMELA TURK

- 1 MARIE UNINI
- 2 ROBERT LECLAIR
- 3 MICHAEL WEATHERBIE
- 4 MICHAEL WEATHERBIE AS TRUSTEE OF WEATHERBIE TRUST
- 5 DOLOROES WEATHERBIE
- 6 ANTHONY WEST
- 7 MARY WEST
- 8 RONALD WHITT
- 9 LOUISE WHITT
- 10 ROBERT WISE
- 11 ROBERT WITT
- 12 EVELYN WITT
- 13 BEVERLY A. KINDIG
- 14 EUGENE V. KINDIG
- 15 PAUL S. KINDIG
- 16 SHARON R. KINDIG
- 17 DR. SAMUEL KREMEN
- 18 JOSE MARIA (JOHN) MARITORENA
- 19 JOSE MARIA (JOHN) MAITORENA AS TRUSTEE OF MARITORENA LIVING TRUST
- 20 MARIE PIERRE MARITORENA
- 21 RICHARD H. MINER
- 22 NEBEKER RANCH
- 23 R&M RANCH, INC.
- 24 JOHN RECA
- 25 ADRIENNE RECA
- 26 MABEL SELAK
- 27 JEFFREY L. SIEBERT
- 28 NANCEE J. SIEBERT

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- 1 VULCAN LANDS INC
- 2 VULCAN MATERIALS COMPANY
- 3 WILLOW SPRINGS COMPANY (NON-PROFIT)
- 4 RICHARD NELSON
- 5 MIKE NELSON
- 6 DONNA WILSON
- 7 NINA J. WILSON

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EXHIBIT E

CHARLTON WEEKS LLP
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Palmdale, CA 93551

1 BRADLEY T. WEEKS, Bar No. 173745
2 CHARLTON WEEKS LLP
3 1031 West Avenue M-14, Suite A
4 Palmdale, CA 93551
5 (661) 265-0969

6 Attorney for Quartz Hill Water District
7 Defendant/Cross Complainant

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF LOS ANGELES-CENTRAL DISTRICT

10 ANTELOPE VALLEY GROUNDWATER
11 CASES

12 Included Actions:

13 Los Angeles County Waterworks District No.
14 40 v. Diamond Farming Co.
15 Superior Court of California, County of Los
16 Angeles, Case No. BC325201;

17 Los Angeles County Waterworks District
18 No. 40 v. Diamond Farming Co.
19 Superior Court of California
20 County of Kern, Case No. S-1500-CV-254-
21 348;

22 Wm. Bolthouse Farms, Inc. v. City of
23 Lancaster
24 Diamond Farming Co. v. City of Lancaster
25 Diamond Farming Co. v. Palmdale Water Dist.
26 Superior Court of California
27 County of Riverside, consolidated actions
28 Case Nos. RIC 353840, RIC 344436,
RIC 344668.

**Judicial Council Coordination Proceeding No.
4408**

Santa Clara Case No. 1-05-CV-049053
Assigned to the Honorable Jack Komar Dept. I

REQUESTS FOR ADMISSIONS (SET TWO)

25 PROPOUNDING PARTY: QUARTZ HILL WATER DISTRICT

26 RESPONDING PARTY: SEE EXHIBIT ONE

27 SET NO.: TWO

CHARLTON WEEKS LLP
1031 West Avenue M-14, Suite A
Palmdale, CA 93551

1 Pursuant to the provisions of Code of Civil Procedure §2033.010 you are hereby requested
2 to admit or deny the following matters under oath within thirty (30) days, which time may be
3 extended for service by mail as provided in the Code of Civil Procedure.

4
5 **Request for Admission Number 5**

6 Admit YOU (YOU refers to the party responding to these requests) have pumped no groundwater
7 from the BASIN (BASIN shall be defined as on and below the ground surface within the
8 jurisdictional area defined by the court in this matter by order dated March 16, 2007) since 1951.


9
10 **Request for Admission Number 6**

11 Admit YOU have used no groundwater from BASIN since 1951.

12
13 **Request for Admission Number 7**

14 Admit YOU have no water rights.

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17 Dated: November 11, 2011

CHARLTON WEEKS LLP

Bradley T. Weeks
Attorney for Quartz Hill Water District

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- 1 A. David Kagon
- 2 A.C. Warnack, as Trustee of The A.C. Warnack Trust
- 3 A.V. United Mutual Group
- 4 Abc Williams Enterprises Lp
- 5 Adams Bennett Investments, LLC
- 6 Airtrust Singapore Private Limited
- 7 Alex Wodchis
- 8 Allen Alevy
- 9 Alta Vista SunTower, LLC
- 10 Anaverde LLC
- 11 Andreas Hauke
- 12 Andrews, Franklin D.
- 13 Andrews, Treba
- 14 Angelo and Dolores M. Cassara as Trustees of the Cassara Marital Trust
- 15 Antelope Valley Country Club Improvement Company, Inc.
- 16 Antelope Valley East-Kern Water Agency
- 17 Antelope Valley Ground Water Agreement Association
- 18 Antelope Valley Joint Union High School District
- 19 Antelope Valley Water Company
- 20 Antelope Valley Water Storage LLC
- 21 Antonio U. Agustines
- 22 Arklin Brothers Enterprises
- 23 Arklin, Philip H.
- 24 Aurora P. Gabuya
- 25 Av Materials, Inc.
- 26 AV Solar Ranch 1, LLC
- 27 B. J. Calandri
- 28 Balice, Maria

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Palmdale, CA 93551

- 1 Balice, Norman
- 2 Barbara L. Keys
- 3 Barry S. Munz
- 4 Betty Gluckstein
- 5 Beverly J. Tobias
- 6 Big Rock Mutual Water Company
- 7 Big West Corp.
- 8 Billy H. Kim
- 9 Blayney, Randall
- 10 Bloom, Melody
- 11 Bolthouse Properties, LLC.
- 12 Bong S. Chang
- 13 Boron Community Services District
- 14 Boruchin, as Trustee for the John and Dora Boruchin Living Trust, John
- 15 Britton Associates, LLP
- 16 Bruce Burrows
- 17 Bujulian Brothers, Inc.
- 18 Burrows, Bruce - 300 A 40 H, LLC
- 19 Bushnell Enterprises, LLC
- 20 C.C. Thelma Cole
- 21 Cabahug, Jaime and Arlene
- 22 California Portland Cement Company
- 23 California, State Of
- 24 Calmat Land Co.
- 25 Calmat Land Company
- 26 Cameron Properties
- 27 Cameron Properties
- 28 Carol K. Claypool

- 1 Castle Butte Dev Corp
- 2 Catellus Development Corporation
- 3 Catharine M. Davis
- 4 Cenon Advincula
- 5 Chan, Hawk Nin - Self-Representing
- 6 Cheng Lin Kang
- 7 Chi S. Huang
- 8 City National Bank, Trustee
- 9 Clifford N. Claypool
- 10 Collicutt, Ikuku
- 11 Consolidated Rock Products
- 12 Consolidated Rock Products Co.
- 13 Copa De Oro Land Company, a California general partnership
- 14 County Sanitation District No. 14
- 15 County Sanitation District No. 20
- 16 Crail, Charles
- 17 Crail, Jean B.
- 18 Crystal Organic Farms LLC
- 19 Daniel Saparzadeh
- 20 Daryush Iraninezhad
- 21 David L. Bowers
- 22 Del Sur Ranch, LLC
- 23 Delmar D. Van Dam
- 24 Desert Lakes Community Services District
- 25 Diamond Farming Company
- 26 Donna L. Higelmire
- 27 Donna L. Simpson
- 28 Dorothy Dreier

- 1 E.C. Wheeler, LLC
- 2 Eastley, Philip
- 3 Edgar C. Ritter
- 4 Elias Qamout
- 5 Elizabeth Wong
- 6 enXco Development Corporation (Sued as Roe 452)
- 7 Esfandiar Kadivar
- 8 eSolar, Inc.
- 9 Estrada, David
- 10 Estrada, Rita
- 11 Eugene B. Nebeker
- 12 Eugene Gabrych
- 13 Eva Lai
- 14 Fares A. Lahoud
- 15 Florence Cernicky as Trustee of the Cernicky Trust
- 16 Forrest G. Godde
- 17 Forrest G. Godde (Indiv & Trustee Of The Forrest G. Godde Trust)
- 18 Frank S. Chiodo
- 19 Frank T. Nguyen
- 20 Frankie H. Salomon Trust
- 21 Fredrichsen, Lewis
- 22 Fry, Ron
- 23 Gailen Kyle
- 24 Gailen W. Kyle (Indiv & Trustee Of The Kyle Trust)
- 25 Gareth L. Simpson
- 26 Gaskell SunTower, LLC
- 27 Gateway Triangle Properties
- 28 Genus Lp

- 1 George C. Stevens, Jr.
- 2 George C. Stevens, Jr. as Trustee of the George C. Stevens, Jr. Trust
- 3 George E. Dreier
- 4 George L. Stimson, Jr.
- 5 Georgine J. Archer
- 6 Gertrude J. Van Dam
- 7 Ggf Llc
- 8 GLDEN SANDS MOBILE HOME PARK
- 9 Grimmway Enterprises, Inc.
- 10 Guss A. Barks, Jr.
- 11 Hancock, Catherine
- 12 Hancock, Timothy
- 13 Harbaugh, Barry
- 14 Harris, Steven
- 15 Healy Enterprises, Inc.
- 16 Helen Stathatos
- 17 Helen Stathatos
- 18 Henry Ngo
- 19 Herbert Katz
- 20 Herrmann, David
- 21 High Desert Investments, LLC
- 22 Hines Family Trust
- 23 Hong Dong
- 24 Hooshpack Dev Inc.
- 25 Huth, Clinto
- 26 Hypericum Interests Llc
- 27 Iannaccone, Elizabeth - Pro-per
- 28 Ildefonso S. Bayani

- 1 Illy King
- 2 J. Cole
- 3 Jack D. Kahlo
- 4 Jacob Chetrit
- 5 Jacqueline Ackerman
- 6 James W. Kyle
- 7 James W. Kyle (Indiv & Trustee Of The Kyle Family Trust)
- 8 Jeanna Y. Chang
- 9 Joan A. Funk
- 10 John A. Calandri (Indiv & As Trustee Of The John And B.J. Calandri 2001 Trust)
- 11 John Calandri
- 12 John Hui
- 13 Joseph H. Gluckstein
- 14 Juanita R. Nichols
- 15 Julia Kyle
- 16 Jung N. Tom
- 17 Jung, Irene
- 18 Jung, Paul
- 19 Kamram S. Shakib
- 20 Kathleen M. Munz
- 21 Kazuko Yoshimatsu
- 22 Keith E. Wales
- 23 Kootenai Properties, Inc.
- 24 Kutu Investment Co.
- 25 L. Gorrindo
- 26 Land Business Corporation
- 27 Landfield, Richard
- 28 Landinv, Inc.

- 1 Lapis Land Company, LLC
- 2 Lawrence A. Godde
- 3 Lawrence A. Godde (Indiv & Trustee Of Lawrence A. Godde Trust)
- 4 Lawrence Charles Trust
- 5 Lebata, Inc.
- 6 Leduc, Larry V.
- 7 Leduc, Sonia S.
- 8 Lee S. Chiou
- 9 Leroy Daniel Bronston
- 10 Leslie Property
- 11 Lewis Fredrichsen
- 12 Light Andrew & Youngnam
- 13 Lilian S. Kaufman
- 14 Little Baldy Mutual Water Company
- 15 Littlerock Aggregate Co., Inc. dba Antelope Valley Aggregate, Inc.
- 16 Llano Mutual Water Company
- 17 Llano-Del Rio Water Company
- 18 Los Angeles County Sanitation Districts
- 19 Lu, Clark C.
- 20 Lu, Danny C.
- 21 Lyman C. Miles
- 22 Lyon, Alice
- 23 M. R. Nasir
- 24 M. S. Chung
- 25 Malloy Family Partners
- 26 Mally Family Partners Lp
- 27 Man C. Lo
- 28 Maria B. Gorrindo

- 1 Marian Gabrych
- 2 Marianne Katz
- 3 Marilyn Burgess
- 4 Marilyn Hauke
- 5 Marilyn J. Prewoznik
- 6 Mark E. Thompson Apc Sharing Plan
- 7 Mark H. Shafron
- 8 Martin Schwartz
- 9 Marwan M. Aldais
- 10 Mary Wong
- 11 Marygrace H. Santoro
- 12 Marygrace H. Santoro (Indiv & Trustee Of The Marygrace H. Santoro Rev Trust)
- 13 Mashallah Afshar
- 14 Mason, David S.
- 15 Mathis, Joe
- 16 Matsui, Jeanne
- 17 Maurice H. Stans
- 18 Max Webb Trustee of the Webb Trust of 1978
- 19 Melinda E. Cameron
- 20 Melinda L. Gillman, Trustee of the Grubb Family Trust
- 21 Melody S. Bloom
- 22 Melvin Thomas Andrews and Margaret E. Andrews, Trustees of the Andrews Living Trust dated
- 23 August 2, 2004
- 24 Michael N. Higelmire
- 25 Middle Butte Mine, Inc.
- 26 Mike M. Wu
- 27 Milton S. Davis
- 28 Minoos Iraninezhad

- 1 Mission Bell Ranch Development
- 2 Mojave Public Utility District
- 3 Moon S. Chang
- 4 Morris Gluckstein
- 5 Morteza M. Foroughi
- 6 Mountain Brook Ranch, LLC
- 7 Murphy, Patty
- 8 New Anaverde, LLC
- 9 Nibbelink Family Trust
- 10 Nilda V. Bayani
- 11 Norman L. Poulsen
- 12 North Edwards Water District
- 13 Northrop Grumman Corporation (Sued As Doe 534)
- 14 Norton P. Recht, Jr.
- 15 Oliva M. Advincula
- 16 Oliver Nichols
- 17 Oscar Rudnick
- 18 Owl Properties, Inc.
- 19 Palmdale Hills Property LLC
- 20 Patricia A. Recht
- 21 Patricia J. Riggins
- 22 Paul Lai
- 23 Paula E. Ritter
- 24 Paula E. Ritter (Indiv & Trustee Of The Ritter Family Trust)
- 25 Pei Chin Lin
- 26 Peter G. Barks
- 27 Phelan Pinon Hills Community Services District
- 28 Pittman, Thomas

- 1 Prewoznik, Marilyn J.
- 2 Prewoznik, Marilyn J., as Trustee of the Marilyn J. Prewoznik Trust
- 3 R And M Ranch
- 4 Rafferty, Gary
- 5 Rafferty, Nona
- 6 Randall Y. Blayney
- 7 Raney, as Trustee for the Robert and Shirley Raney Living Trust , Robert D.
- 8 Raney, as Trustee for the Robert and Shirley Raney Living Trust , Shirley B.
- 9 Rebecca Rudnick
- 10 Red Dawn SunTower, LLC
- 11 Reinelt Rosenloecher Corp. Psp
- 12 Richard E. Landfield
- 13 Robert A. Jones
- 14 Robert L. Shafron
- 15 Rodrigo L. Gabuya
- 16 Roland N. Grubb
- 17 Romo Lake Los Angeles Partnership
- 18 Ronald E. Bowers
- 19 Rosamond Ranch
- 20 Rose Gluckstein
- 21 Rosemount Equities Llc Series
- 22 Royal Investors Group
- 23 Royal Western Properties Llc
- 24 Ruth A. Cumming
- 25 San Yu Enterprises, Inc.
- 26 Santa Monica Mountains Conservancy
- 27 Sarkis Djanibekyan
- 28 Savas Stathatos

- 1 Savas Stathatos (Indiv & Trustee Of The Stathatos Family Trust)
- 2 Service Rock Products, L.P. (originally named as Service Rock Products Corporation)
- 3 Seven Star United Llc
- 4 SGS Antelope Valley Development LLC
- 5 SHAKIB, KAMRAM
- 6 Sheep Creek Water Company
- 7 Sheldon R. Blum, Trustee for the Sheldon R. Blum Trust
- 8 Sheldon R. Blum, Trustee, for the Sheldon R. Blum Trust; & Sheldon R. Blum, Individually
- 9 Sheng Tom
- 10 Shiung Ru Lo
- 11 Shokrian, Elias
- 12 Shokrian, Shirley
- 13 Sierra SunTower, LLC
- 14 Simin C. Neman
- 15 Soaring Vista Properties, Inc.
- 16 Sorrento West Properties, Inc.
- 17 Souad R. Nasir
- 18 Southern California Edison Company
- 19 SPC Del Sur Ranch, LLC
- 20 State Of California 50TH District And Agricultural Association
- 21 State of California; Santa Monica Mountains Conservancy; 50th District Agricultural Association
- 22 Stevens, Jr., George C.
- 23 Su, Rong
- 24 Suchu T. Huang
- 25 Tejon Ranch Company
- 26 Tejon Ranchcorp
- 27 Terry A. Munz
- 28 The Philip H. Arklin Family Trust Dated April 28, 1994

- 1 Three Arklin Limited Liability Company, The
- 2 Tierra Bonita Ranch Company
- 3 Tiong D. Tiu
- 4 Tom, Jung N.
- 5 Treacy, Patrick
- 6 Triple M Property F.K.A. 3M Property Investment Co
- 7 Trustee For The Alevy Family Trust
- 8 Trustee For The Georgine J. Archer Trust
- 9 Trustee For The Kagon Trust
- 10 Trustee For The Katz Family Trust
- 11 Trustee For The Lilian S. Kaufman Trust
- 12 Trustee For The M. Gorrindo Trust
- 13 Trustee For The Marygrace H. Santoro Rev Trust
- 14 Trustee For The Miles Family Trust
- 15 Trustee For The P C Rev Inter Vivos Trust
- 16 Trustee For The Stathatos Family Trust
- 17 Trustee For The T.J. Cole Trust
- 18 Trustee Of The Barbara L. Keys Family Trust
- 19 Trustee Of The Burroughs Irr Family Trust
- 20 Trustee Of The Cumming Family Trust
- 21 Trustee Of The Foroughi Family Trust
- 22 Trustee Of The Forrest G. Godde Trust
- 23 Trustee Of The Fredrichsen Family Trust
- 24 Trustee Of The George C. Stevens, Jr. Trust
- 25 Trustee Of The Godde Trust
- 26 Trustee Of The Grubb Family Trust
- 27 Trustee Of The Illy King Family Trust
- 28 Trustee Of The John And B.J. Calandri 2001 Trust

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Palmddale, CA 93551

- 1 Trustee Of The Kadivar Family Trust
- 2 Trustee Of The Kyle Family Trust
- 3 Trustee Of The Kyle Trust
- 4 Trustee Of The Marilyn J. Prewoznik Trust
- 5 Trustee Of The Nichols Family Trust
- 6 Trustee Of The Richard E. Landfield Trust
- 7 Trustee Of The Riggins Family Trust
- 8 Trustee Of The Ritter Family Trust
- 9 Trustee Of The Simpson Family Trust
- 10 Trustee Of The Tobias Family Trust
- 11 Trustee Of The Trueblood Family Trust
- 12 Trustee Of The Wu Family Trust
- 13 Tumbleweed SunTower, LLC
- 14 U.S. Borax, Inc.
- 15 Unison Investment Co., Llc
- 16 Valentine, Roland
- 17 Van Dam, Craig
- 18 Van Dam, Delmar D.
- 19 Van Dam, Gary
- 20 Van Dam, Gertrude J.
- 21 Veronika Reinelt
- 22 Victoria Rahimi
- 23 W. F. Clumen, Jr.
- 24 WAGAS Land Company LLC
- 25 Walter E. Helmick
- 26 Wanda E. Kyle
- 27 WDS California II, LLC
- 28 White Fence Farms Mutual Water Co. Inc.

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- 1 William Bolthouse Farms, Inc.
- 2 Willis, Rebecca Lee
- 3 Wilma D. Trueblood
- 4 Wm. Bolthouse Farms, Inc.
- 5 Wood, Richard A.
- 6 Ying Wah Lam
- 7 Ying X. Dong
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CHARLION WEEKS LLP
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Palmdale, CA 93551

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PROOF OF SERVICE

I am employed in the aforesaid county, State of California; I am over eighteen years of age and not a party to the within action; my business address is 1031 West Avenue M-14, Suite A, Palmdale, California, 93551.

On November 11, 2011, at my place of business at Palmdale, California, a copy of the following DOCUMENT(s):

REQUESTS FOR ADMISSION (Set Two)

By posting the DOCUMENT listed above to the Santa Clara Superior Court website in regard to the Antelope Valley Groundwater Matter:

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

Executed on November 11, 2011


Gayle Benald

EXHIBIT F

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):

Bradley T. Weeks (Bar # 173745)
 Charlton Weeks LLP
 1031 West Avenue M-14, Suite A
 Palmdale, CA 93551
 TELEPHONE NO.: (661) 265-0969
 FAX NO. (Optional): (661) 265-1650
 E-MAIL ADDRESS (Optional): brad@charltonweeks.com
 ATTORNEY FOR (Name): Quartz Hill Water District

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

SHORT TITLE OF CASE:

ANTELOPE VALLEY GROUNDWATER CASES

FORM INTERROGATORIES—GENERAL

Asking Party: Quartz Hill Water District

Answering Party: See Exhibit One
 Set No.: Two

CASE NUMBER:

Judicial Council Coordination
 Proceeding No. 4408

Sec. 1. Instructions to All Parties

- (a) Interrogatories are written questions prepared by a party to an action that are sent to any other party in the action to be answered under oath. The interrogatories below are form interrogatories approved for use in civil cases.
- (b) For time limitations, requirements for service on other parties, and other details, see Code of Civil Procedure sections 2030.010–2030.410 and the cases construing those sections.
- (c) These form interrogatories do not change existing law relating to interrogatories nor do they affect an answering party's right to assert any privilege or make any objection.

Sec. 2. Instructions to the Asking Party

- (a) These interrogatories are designed for optional use by parties in unlimited civil cases where the amount demanded exceeds \$25,000. Separate interrogatories, Form *Interrogatories—Limited Civil Cases (Economic Litigation)* (form DISC-004), which have no subparts, are designed for use in limited civil cases where the amount demanded is \$25,000 or less; however, those interrogatories may also be used in unlimited civil cases.
- (b) Check the box next to each interrogatory that you want the answering party to answer. Use care in choosing those interrogatories that are applicable to the case.
- (c) You may insert your own definition of **INCIDENT** in Section 4, but only where the action arises from a course of conduct or a series of events occurring over a period of time.
- (d) The interrogatories in section 16.0, Defendant's Contentions—Personal Injury, should not be used until the defendant has had a reasonable opportunity to conduct an investigation or discovery of plaintiff's injuries and damages.
- (e) Additional interrogatories may be attached.

Sec. 3. Instructions to the Answering Party

- (a) An answer or other appropriate response must be given to each interrogatory checked by the asking party.
- (b) As a general rule, within 30 days after you are served with these interrogatories, you must serve your responses on the asking party and serve copies of your responses on all other parties to the action who have appeared. See Code of Civil Procedure sections 2030.260–2030.270 for details.

- (c) Each answer must be as complete and straightforward as the information reasonably available to you, including the information possessed by your attorneys or agents, permits. If an interrogatory cannot be answered completely, answer it to the extent possible.
- (d) If you do not have enough personal knowledge to fully answer an interrogatory, say so, but make a reasonable and good faith effort to get the information by asking other persons or organizations, unless the information is equally available to the asking party.
- (e) Whenever an interrogatory may be answered by referring to a document, the document may be attached as an exhibit to the response and referred to in the response. If the document has more than one page, refer to the page and section where the answer to the interrogatory can be found.
- (f) Whenever an address and telephone number for the same person are requested in more than one interrogatory, you are required to furnish them in answering only the first interrogatory asking for that information.
- (g) If you are asserting a privilege or making an objection to an interrogatory, you must specifically assert the privilege or state the objection in your written response.
- (h) Your answers to these interrogatories must be verified, dated, and signed. You may wish to use the following form at the end of your answers:

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

(DATE)

(SIGNATURE)

Sec. 4. Definitions

Words in **BOLDFACE CAPITALS** in these interrogatories are defined as follows:

(a) (Check one of the following):

- (1) **INCIDENT** includes the circumstances and events surrounding the alleged accident, injury, or other occurrence or breach of contract giving rise to this action or proceeding.

(2) **INCIDENT** means (insert your definition here or on a separate, attached sheet labeled "Sec. 4(a)(2)"): _____

(b) **YOU OR ANYONE ACTING ON YOUR BEHALF** includes you, your agents, your employees, your insurance companies, their agents, their employees, your attorneys, your accountants, your investigators, and anyone else acting on your behalf.

(c) **PERSON** includes a natural person, firm, association, organization, partnership, business, trust, limited liability company, corporation, or public entity.

(d) **DOCUMENT** means a writing, as defined in Evidence Code section 250, and includes the original or a copy of handwriting, typewriting, printing, photostats, photographs, electronically stored information, and every other means of recording upon any tangible thing and form of communicating or representation, including letters, words, pictures, sounds, or symbols, or combinations of them.

(e) **HEALTH CARE PROVIDER** includes any **PERSON** referred to in Code of Civil Procedure section 667.7(e)(3).

(f) **ADDRESS** means the street address, including the city, state, and zip code.

Sec. 5. Interrogatories

The following interrogatories have been approved by the Judicial Council under Code of Civil Procedure section 2033.710:

CONTENTS

- 1.0 Identity of Persons Answering These Interrogatories
- 2.0 General Background Information—Individual
- 3.0 General Background Information—Business Entity
- 4.0 Insurance
- 5.0 [Reserved]
- 6.0 Physical, Mental, or Emotional Injuries
- 7.0 Property Damage
- 8.0 Loss of Income or Earning Capacity
- 9.0 Other Damages
- 10.0 Medical History
- 11.0 Other Claims and Previous Claims
- 12.0 Investigation—General
- 13.0 Investigation—Surveillance
- 14.0 Statutory or Regulatory Violations
- 15.0 Denials and Special or Affirmative Defenses
- 16.0 Defendant's Contentions Personal Injury
- 17.0 Responses to Request for Admissions
- 18.0 [Reserved]
- 19.0 [Reserved]
- 20.0 How the Incident Occurred—Motor Vehicle
- 25.0 [Reserved]
- 30.0 [Reserved]
- 40.0 [Reserved]
- 50.0 Contract
- 60.0 [Reserved]
- 70.0 Unlawful Detainer [See separate form DISC-003]
- 101.0 Economic Litigation [See separate form DISC-004]
- 200.0 Employment Law [See separate form DISC-002]
- Family Law [See separate form FL-145]

1.0 Identity of Persons Answering These Interrogatories

1.1 State the name, **ADDRESS**, telephone number, and relationship to you of each **PERSON** who prepared or assisted in the preparation of the responses to these interrogatories. (Do not identify anyone who simply typed or reproduced the responses.)

2.0 General Background Information—individual

- 2.1 State:
 - (a) your name;
 - (b) every name you have used in the past; and
 - (c) the dates you used each name.
- 2.2 State the date and place of your birth.
- 2.3 At the time of the **INCIDENT**, did you have a driver's license? If so state:
 - (a) the state or other issuing entity;
 - (b) the license number and type;
 - (c) the date of issuance; and
 - (d) all restrictions.
- 2.4 At the time of the **INCIDENT**, did you have any other permit or license for the operation of a motor vehicle? If so, state:
 - (a) the state or other issuing entity;
 - (b) the license number and type;
 - (c) the date of issuance; and
 - (d) all restrictions.
- 2.5 State:
 - (a) your present residence **ADDRESS**;
 - (b) your residence **ADDRESSES** for the past five years; and
 - (c) the dates you lived at each **ADDRESS**.
- 2.6 State:
 - (a) the name, **ADDRESS**, and telephone number of your present employer or place of self-employment; and
 - (b) the name, **ADDRESS**, dates of employment, job title, and nature of work for each employer or self-employment you have had from five years before the **INCIDENT** until today.
- 2.7 State:
 - (a) the name and **ADDRESS** of each school or other academic or vocational institution you have attended, beginning with high school;
 - (b) the dates you attended;
 - (c) the highest grade level you have completed; and
 - (d) the degrees received.
- 2.8 Have you ever been convicted of a felony? If so, for each conviction state:
 - (a) the city and state where you were convicted;
 - (b) the date of conviction;
 - (c) the offense; and
 - (d) the court and case number.
- 2.9 Can you speak English with ease? If not, what language and dialect do you normally use?
- 2.10 Can you read and write English with ease? If not, what language and dialect do you normally use?

- 2.11 At the time of the **INCIDENT** were you acting as an agent or employee for any **PERSON**? If so, state:
- the name, **ADDRESS**, and telephone number of that **PERSON**; and
 - a description of your duties.
- 2.12 At the time of the **INCIDENT** did you or any other person have any physical, emotional, or mental disability or condition that may have contributed to the occurrence of the **INCIDENT**? If so, for each person state:
- the name, **ADDRESS**, and telephone number;
 - the nature of the disability or condition; and
 - the manner in which the disability or condition contributed to the occurrence of the **INCIDENT**.
- 2.13 Within 24 hours before the **INCIDENT** did you or any person involved in the **INCIDENT** use or take any of the following substances: alcoholic beverage, marijuana, or other drug or medication of any kind (prescription or not)? If so, for each person state:
- the name, **ADDRESS**, and telephone number;
 - the nature or description of each substance;
 - the quantity of each substance used or taken;
 - the date and time of day when each substance was used or taken;
 - the **ADDRESS** where each substance was used or taken;
 - the name, **ADDRESS**, and telephone number of each person who was present when each substance was used or taken; and
 - the name, **ADDRESS**, and telephone number of any **HEALTH CARE PROVIDER** who prescribed or furnished the substance and the condition for which it was prescribed or furnished.

3.0 General Background Information—Business Entity

- 3.1 Are you a corporation? If so, state:
- the name stated in the current articles of incorporation;
 - all other names used by the corporation during the past 10 years and the dates each was used;
 - the date and place of incorporation;
 - the **ADDRESS** of the principal place of business; and
 - whether you are qualified to do business in California.
- 3.2 Are you a partnership? If so, state:
- the current partnership name;
 - all other names used by the partnership during the past 10 years and the dates each was used;
 - whether you are a limited partnership and, if so, under the laws of what jurisdiction;
 - the name and **ADDRESS** of each general partner; and
 - the **ADDRESS** of the principal place of business.
- 3.3 Are you a limited liability company? If so, state:
- the name stated in the current articles of organization;
 - all other names used by the company during the past 10 years and the date each was used;
 - the date and place of filing of the articles of organization;
 - the **ADDRESS** of the principal place of business; and
 - whether you are qualified to do business in California.

- 3.4 Are you a joint venture? If so, state:
- the current joint venture name;
 - all other names used by the joint venture during the past 10 years and the dates each was used;
 - the name and **ADDRESS** of each joint venturer; and
 - the **ADDRESS** of the principal place of business.
- 3.5 Are you an unincorporated association? If so, state:
- the current unincorporated association name;
 - all other names used by the unincorporated association during the past 10 years and the dates each was used; and
 - the **ADDRESS** of the principal place of business.
- 3.6 Have you done business under a fictitious name during the past 10 years? If so, for each fictitious name state:
- the name;
 - the dates each was used;
 - the state and county of each fictitious name filing; and
 - the **ADDRESS** of the principal place of business.
- 3.7 Within the past five years has any public entity registered or licensed your business? If so, for each license or registration:
- identify the license or registration;
 - state the name of the public entity; and
 - state the dates of issuance and expiration.

4.0 Insurance

- 4.1 At the time of the **INCIDENT**, was there in effect any policy of insurance through which you were or might be insured in any manner (for example, primary, pro-rata, or excess liability coverage or medical expense coverage) for the damages, claims, or actions that have arisen out of the **INCIDENT**? If so, for each policy state:
- the kind of coverage;
 - the name and **ADDRESS** of the insurance company;
 - the name, **ADDRESS**, and telephone number of each named insured;
 - the policy number;
 - the limits of coverage for each type of coverage contained in the policy;
 - whether any reservation of rights or controversy or coverage dispute exists between you and the insurance company; and
 - the name, **ADDRESS**, and telephone number of the custodian of the policy.
- 4.2 Are you self-insured under any statute for the damages, claims, or actions that have arisen out of the **INCIDENT**? If so, specify the statute.

5.0 [Reserved]

6.0 Physical, Mental, or Emotional Injuries

- 6.1 Do you attribute any physical, mental, or emotional injuries to the **INCIDENT**? (If your answer is "no," do not answer interrogatories 6.2 through 6.7).
- 6.2 Identify each injury you attribute to the **INCIDENT** and the area of your body affected.

- 6.3 Do you still have any complaints that you attribute to the **INCIDENT**? If so, for each complaint state:
 - (a) a description;
 - (b) whether the complaint is subsiding, remaining the same, or becoming worse; and
 - (c) the frequency and duration.

- 6.4 Did you receive any consultation or examination (except from expert witnesses covered by Code of Civil Procedure sections 2034.210–2034.310) or treatment from a **HEALTH CARE PROVIDER** for any injury you attribute to the **INCIDENT**? If so, for each **HEALTH CARE PROVIDER** state:
 - (a) the name, **ADDRESS**, and telephone number;
 - (b) the type of consultation, examination, or treatment provided;
 - (c) the dates you received consultation, examination, or treatment; and
 - (d) the charges to date.

- 6.5 Have you taken any medication, prescribed or not, as a result of injuries that you attribute to the **INCIDENT**? If so, for each medication state:
 - (a) the name;
 - (b) the **PERSON** who prescribed or furnished it;
 - (c) the date it was prescribed or furnished;
 - (d) the dates you began and stopped taking it; and
 - (e) the cost to date.

- 6.6 Are there any other medical services necessitated by the injuries that you attribute to the **INCIDENT** that were not previously listed (for example, ambulance, nursing, prosthetics)? If so, for each service state:
 - (a) the nature;
 - (b) the date;
 - (c) the cost; and
 - (d) the name, **ADDRESS**, and telephone number of each provider.

- 6.7 Has any **HEALTH CARE PROVIDER** advised that you may require future or additional treatment for any injuries that you attribute to the **INCIDENT**? If so, for each injury state:
 - (a) the name and **ADDRESS** of each **HEALTH CARE PROVIDER**;
 - (b) the complaints for which the treatment was advised; and
 - (c) the nature, duration, and estimated cost of the treatment.

7.0 Property Damage

- 7.1 Do you attribute any loss of or damage to a vehicle or other property to the **INCIDENT**? If so, for each item of property:
 - (a) describe the property;
 - (b) describe the nature and location of the damage to the property;

- (c) state the amount of damage you are claiming for each item of property and how the amount was calculated; and
- (d) if the property was sold, state the name, **ADDRESS**, and telephone number of the seller, the date of sale, and the sale price.

- 7.2 Has a written estimate or evaluation been made for any item of property referred to in your answer to the preceding interrogatory? If so, for each estimate or evaluation state:
 - (a) the name, **ADDRESS**, and telephone number of the **PERSON** who prepared it and the date prepared;
 - (b) the name, **ADDRESS**, and telephone number of each **PERSON** who has a copy of it; and
 - (c) the amount of damage stated.

- 7.3 Has any item of property referred to in your answer to interrogatory 7.1 been repaired? If so, for each item state:
 - (a) the date repaired;
 - (b) a description of the repair;
 - (c) the repair cost;
 - (d) the name, **ADDRESS**, and telephone number of the **PERSON** who repaired it;
 - (e) the name, **ADDRESS**, and telephone number of the **PERSON** who paid for the repair.

8.0 Loss of Income or Earning Capacity

- 8.1 Do you attribute any loss of income or earning capacity to the **INCIDENT**? (If your answer is "no," do not answer interrogatories 8.2 through 8.8).

- 8.2 State:
 - (a) the nature of your work;
 - (b) your job title at the time of the **INCIDENT**; and
 - (c) the date your employment began.

- 8.3 State the last date before the **INCIDENT** that you worked for compensation.

- 8.4 State your monthly income at the time of the **INCIDENT** and how the amount was calculated.

- 8.5 State the date you returned to work at each place of employment following the **INCIDENT**.

- 8.6 State the dates you did not work and for which you lost income as a result of the **INCIDENT**.

- 8.7 State the total income you have lost to date as a result of the **INCIDENT** and how the amount was calculated.

- 8.8 Will you lose income in the future as a result of the **INCIDENT**? If so, state:
 - (a) the facts upon which you base this contention;
 - (b) an estimate of the amount;
 - (c) an estimate of how long you will be unable to work; and
 - (d) how the claim for future income is calculated.

9.0 Other Damages

- 9.1 Are there any other damages that you attribute to the **INCIDENT**? If so, for each item of damage state:
- (a) the nature;
 - (b) the date it occurred;
 - (c) the amount; and
 - (d) the name, **ADDRESS**, and telephone number of each **PERSON** to whom an obligation was incurred.

- 9.2 Do any **DOCUMENTS** support the existence or amount of any item of damages claimed in interrogatory 9.1? If so, describe each document and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT**.

10.0 Medical History

- 10.1 At any time before the **INCIDENT** did you have complaints or injuries that involved the same part of your body claimed to have been injured in the **INCIDENT**? If so, for each state:
- (a) a description of the complaint or injury;
 - (b) the dates it began and ended; and
 - (c) the name, **ADDRESS**, and telephone number of each **HEALTH CARE PROVIDER** whom you consulted or who examined or treated you.

- 10.2 List all physical, mental, and emotional disabilities you had immediately before the **INCIDENT**. (*You may omit mental or emotional disabilities unless you attribute any mental or emotional injury to the **INCIDENT**.*)

- 10.3 At any time after the **INCIDENT**, did you sustain injuries of the kind for which you are now claiming damages? If so, for each incident giving rise to an injury state:
- (a) the date and the place it occurred;
 - (b) the name, **ADDRESS**, and telephone number of any other **PERSON** involved;
 - (c) the nature of any injuries you sustained;
 - (d) the name, **ADDRESS**, and telephone number of each **HEALTH CARE PROVIDER** who you consulted or who examined or treated you; and
 - (e) the nature of the treatment and its duration.

11.0 Other Claims and Previous Claims

- 11.1 Except for this action, in the past 10 years have you filed an action or made a written claim or demand for compensation for your personal injuries? If so, for each action, claim, or demand state:
- (a) the date, time, and place and location (closest street **ADDRESS** or intersection) of the **INCIDENT** giving rise to the action, claim, or demand;
 - (b) the name, **ADDRESS**, and telephone number of each **PERSON** against whom the claim or demand was made or the action filed;

- (c) the court, names of the parties, and case number of any action filed;
- (d) the name, **ADDRESS**, and telephone number of any attorney representing you;
- (e) whether the claim or action has been resolved or is pending; and
- (f) a description of the injury.

- 11.2 In the past 10 years have you made a written claim or demand for workers' compensation benefits? If so, for each claim or demand state:
- (a) the date, time, and place of the **INCIDENT** giving rise to the claim;
 - (b) the name, **ADDRESS**, and telephone number of your employer at the time of the injury;
 - (c) the name, **ADDRESS**, and telephone number of the workers' compensation insurer and the claim number;
 - (d) the period of time during which you received workers' compensation benefits;
 - (e) a description of the injury;
 - (f) the name, **ADDRESS**, and telephone number of any **HEALTH CARE PROVIDER** who provided services; and
 - (g) the case number at the Workers' Compensation Appeals Board.

12.0 Investigation—General

- 12.1 State the name, **ADDRESS**, and telephone number of each individual:
- (a) who witnessed the **INCIDENT** or the events occurring immediately before or after the **INCIDENT**;
 - (b) who made any statement at the scene of the **INCIDENT**;
 - (c) who heard any statements made about the **INCIDENT** by any individual at the scene; and
 - (d) who **YOU OR ANYONE ACTING ON YOUR BEHALF** claim has knowledge of the **INCIDENT** (except for expert witnesses covered by Code of Civil Procedure section 2034).

- 12.2 Have **YOU OR ANYONE ACTING ON YOUR BEHALF** interviewed any individual concerning the **INCIDENT**? If so, for each individual state:
- (a) the name, **ADDRESS**, and telephone number of the individual interviewed;
 - (b) the date of the interview; and
 - (c) the name, **ADDRESS**, and telephone number of the **PERSON** who conducted the interview.

- 12.3 Have **YOU OR ANYONE ACTING ON YOUR BEHALF** obtained a written or recorded statement from any individual concerning the **INCIDENT**? If so, for each statement state:
- (a) the name, **ADDRESS**, and telephone number of the individual from whom the statement was obtained;
 - (b) the name, **ADDRESS**, and telephone number of the individual who obtained the statement;
 - (c) the date the statement was obtained; and
 - (d) the name, **ADDRESS**, and telephone number of each **PERSON** who has the original statement or a copy.

12.4 Do **YOU OR ANYONE ACTING ON YOUR BEHALF** know of any photographs, films, or videotapes depicting any place, object, or individual concerning the **INCIDENT** or plaintiff's injuries? If so, state:

- (a) the number of photographs or feet of film or videotape;
- (b) the places, objects, or persons photographed, filmed, or videotaped;
- (c) the date the photographs, films, or videotapes were taken;
- (d) the name, **ADDRESS**, and telephone number of the individual taking the photographs, films, or videotapes; and
- (e) the name, **ADDRESS**, and telephone number of each **PERSON** who has the original or a copy of the photographs, films, or videotapes.

12.5 Do **YOU OR ANYONE ACTING ON YOUR BEHALF** know of any diagram, reproduction, or model of any place or thing (except for items developed by expert witnesses covered by Code of Civil Procedure sections 2034.210–2034.310) concerning the **INCIDENT**? If so, for each item state:

- (a) the type (i.e., diagram, reproduction, or model);
- (b) the subject matter; and
- (c) the name, **ADDRESS**, and telephone number of each **PERSON** who has it.

12.6 Was a report made by any **PERSON** concerning the **INCIDENT**? If so, state:

- (a) the name, title, identification number, and employer of the **PERSON** who made the report;
- (b) the date and type of report made;
- (c) the name, **ADDRESS**, and telephone number of the **PERSON** for whom the report was made; and
- (d) the name, **ADDRESS**, and telephone number of each **PERSON** who has the original or a copy of the report.

12.7 Have **YOU OR ANYONE ACTING ON YOUR BEHALF** inspected the scene of the **INCIDENT**? If so, for each inspection state:

- (a) the name, **ADDRESS**, and telephone number of the individual making the inspection (except for expert witnesses covered by Code of Civil Procedure sections 2034.210–2034.310); and
- (b) the date of the inspection.

13.0 Investigation—Surveillance

13.1 Have **YOU OR ANYONE ACTING ON YOUR BEHALF** conducted surveillance of any individual involved in the **INCIDENT** or any party to this action? If so, for each surveillance state:

- (a) the name, **ADDRESS**, and telephone number of the individual or party;
- (b) the time, date, and place of the surveillance;
- (c) the name, **ADDRESS**, and telephone number of the individual who conducted the surveillance; and
- (d) the name, **ADDRESS**, and telephone number of each **PERSON** who has the original or a copy of any surveillance photograph, film, or videotape.

13.2 Has a written report been prepared on the surveillance? If so, for each written report state:

- (a) the title;
- (b) the date;
- (c) the name, **ADDRESS**, and telephone number of the individual who prepared the report; and
- (d) the name, **ADDRESS**, and telephone number of each **PERSON** who has the original or a copy.

14.0 Statutory or Regulatory Violations

14.1 Do **YOU OR ANYONE ACTING ON YOUR BEHALF** contend that any **PERSON** involved in the **INCIDENT** violated any statute, ordinance, or regulation and that the violation was a legal (proximate) cause of the **INCIDENT**? If so, identify the name, **ADDRESS**, and telephone number of each **PERSON** and the statute, ordinance, or regulation that was violated.

14.2 Was any **PERSON** cited or charged with a violation of any statute, ordinance, or regulation as a result of this **INCIDENT**? If so, for each **PERSON** state:

- (a) the name, **ADDRESS**, and telephone number of the **PERSON**;
- (b) the statute, ordinance, or regulation allegedly violated;
- (c) whether the **PERSON** entered a plea in response to the citation or charge and, if so, the plea entered; and
- (d) the name and **ADDRESS** of the court or administrative agency, names of the parties, and case number.

15.0 Denials and Special or Affirmative Defenses

15.1 Identify each denial of a material allegation and each special or affirmative defense in your pleadings and for each:

- (a) state all facts upon which you base the denial or special or affirmative defense;
- (b) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of those facts; and
- (c) identify all **DOCUMENTS** and other tangible things that support your denial or special or affirmative defense, and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT**.

16.0 Defendant's Contentions—Personal Injury

16.1 Do you contend that any **PERSON**, other than you or plaintiff, contributed to the occurrence of the **INCIDENT** or the injuries or damages claimed by plaintiff? If so, for each **PERSON**:

- (a) state the name, **ADDRESS**, and telephone number of the **PERSON**;
- (b) state all facts upon which you base your contention;
- (c) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
- (d) identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

16.2 Do you contend that plaintiff was not injured in the **INCIDENT**? If so:

- (a) state all facts upon which you base your contention;
- (b) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
- (c) identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

- 16.3 Do you contend that the injuries or the extent of the injuries claimed by plaintiff as disclosed in discovery proceedings thus far in this case were not caused by the **INCIDENT**? If so, for each injury:
- identify it;
 - state all facts upon which you base your contention;
 - state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
 - identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.
- 16.4 Do you contend that any of the services furnished by any **HEALTH CARE PROVIDER** claimed by plaintiff in discovery proceedings thus far in this case were not due to the **INCIDENT**? If so:
- identify each service;
 - state all facts upon which you base your contention;
 - state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
 - identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.
- 16.5 Do you contend that any of the costs of services furnished by any **HEALTH CARE PROVIDER** claimed as damages by plaintiff in discovery proceedings thus far in this case were not necessary or unreasonable? If so:
- identify each cost;
 - state all facts upon which you base your contention;
 - state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
 - identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.
- 16.6 Do you contend that any part of the loss of earnings or income claimed by plaintiff in discovery proceedings thus far in this case was unreasonable or was not caused by the **INCIDENT**? If so:
- identify each part of the loss;
 - state all facts upon which you base your contention;
 - state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
 - identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.
- 16.7 Do you contend that any of the property damage claimed by plaintiff in discovery Proceedings thus far in this case was not caused by the **INCIDENT**? If so:
- identify each item of property damage;
 - state all facts upon which you base your contention;
 - state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
 - identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.
- 16.8 Do you contend that any of the costs of repairing the property damage claimed by plaintiff in discovery proceedings thus far in this case were unreasonable? If so:
- identify each cost item;
 - state all facts upon which you base your contention;
 - state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
 - identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.
- 16.9 Do **YOU OR ANYONE ACTING ON YOUR BEHALF** have any **DOCUMENT** (for example, insurance bureau index reports) concerning claims for personal injuries made before or after the **INCIDENT** by a plaintiff in this case? If so, for each plaintiff state:
- the source of each **DOCUMENT**;
 - the date each claim arose;
 - the nature of each claim; and
 - the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT**.
- 16.10 Do **YOU OR ANYONE ACTING ON YOUR BEHALF** have any **DOCUMENT** concerning the past or present physical, mental, or emotional condition of any plaintiff in this case from a **HEALTH CARE PROVIDER** not previously identified (except for expert witnesses covered by Code of Civil Procedure sections 2034.210–2034.310)? If so, for each plaintiff state:
- the name, **ADDRESS**, and telephone number of each **HEALTH CARE PROVIDER**;
 - a description of each **DOCUMENT**; and
 - the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT**.
- 17.0 Responses to Request for Admissions**
- 17.1 Is your response to each request for admission served with these interrogatories an unqualified admission? If not, for each response that is not an unqualified admission:
- state the number of the request;
 - state all facts upon which you base your response;
 - state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of those facts; and
 - identify all **DOCUMENTS** and other tangible things that support your response and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.
- 18.0 [Reserved]**
- 19.0 [Reserved]**
- 20.0 How the Incident Occurred—Motor Vehicle**
- 20.1 State the date, time, and place of the **INCIDENT** (closest street **ADDRESS** or intersection).
- 20.2 For each vehicle involved in the **INCIDENT**, state:
- the year, make, model, and license number;
 - the name, **ADDRESS**, and telephone number of the driver;

- (c) the name, **ADDRESS**, and telephone number of each occupant other than the driver;
- (d) the name, **ADDRESS**, and telephone number of each registered owner;
- (e) the name, **ADDRESS**, and telephone number of each lessee;
- (f) the name, **ADDRESS**, and telephone number of each owner other than the registered owner or lien holder; and
- (g) the name of each owner who gave permission or consent to the driver to operate the vehicle.
- 20.3 State the **ADDRESS** and location where your trip began and the **ADDRESS** and location of your destination.
- 20.4 Describe the route that you followed from the beginning of your trip to the location of the **INCIDENT**, and state the location of each stop, other than routine traffic stops, during the trip leading up to the **INCIDENT**.
- 20.5 State the name of the street or roadway, the lane of travel, and the direction of travel of each vehicle involved in the **INCIDENT** for the 500 feet of travel before the **INCIDENT**.
- 20.6 Did the **INCIDENT** occur at an intersection? If so, describe all traffic control devices, signals, or signs at the intersection.
- 20.7 Was there a traffic signal facing you at the time of the **INCIDENT**? If so, state:
- (a) your location when you first saw it;
- (b) the color;
- (c) the number of seconds it had been that color; and
- (d) whether the color changed between the time you first saw it and the **INCIDENT**.
- 20.8 State how the **INCIDENT** occurred, giving the speed, direction, and location of each vehicle involved:
- (a) just before the **INCIDENT**;
- (b) at the time of the **INCIDENT**; and (c) just after the **INCIDENT**.
- 20.9 Do you have information that a malfunction or defect in a vehicle caused the **INCIDENT**? If so:
- (a) identify the vehicle;
- (b) identify each malfunction or defect;
- (c) state the name, **ADDRESS**, and telephone number of each **PERSON** who is a witness to or has information about each malfunction or defect; and
- (d) state the name, **ADDRESS**, and telephone number of each **PERSON** who has custody of each defective part.
- 20.10 Do you have information that any malfunction or defect in a vehicle contributed to the injuries sustained in the **INCIDENT**? If so:
- (a) identify the vehicle;
- (b) identify each malfunction or defect;
- (c) state the name, **ADDRESS**, and telephone number of each **PERSON** who is a witness to or has information about each malfunction or defect; and
- (d) state the name, **ADDRESS**, and telephone number of each **PERSON** who has custody of each defective part.
- 20.11 State the name, **ADDRESS**, and telephone number of each owner and each **PERSON** who has had possession since the **INCIDENT** of each vehicle involved in the **INCIDENT**.
- 25.0 [Reserved]
- 30.0 [Reserved]
- 40.0 [Reserved]
- 50.0 Contract
- 50.1 For each agreement alleged in the pleadings:
- (a) identify each **DOCUMENT** that is part of the agreement and for each state the name, **ADDRESS**, and telephone number of each **PERSON** who has the **DOCUMENT**;
- (b) state each part of the agreement not in writing, the name, **ADDRESS**, and telephone number of each **PERSON** agreeing to that provision, and the date that part of the agreement was made;
- (c) identify all **DOCUMENTS** that evidence any part of the agreement not in writing and for each state the name, **ADDRESS**, and telephone number of each **PERSON** who has the **DOCUMENT**;
- (d) identify all **DOCUMENTS** that are part of any modification to the agreement, and for each state the name, **ADDRESS**, and telephone number of each **PERSON** who has the **DOCUMENT**;
- (e) state each modification not in writing, the date, and the name, **ADDRESS**, and telephone number of each **PERSON** agreeing to the modification, and the date the modification was made;
- (f) identify all **DOCUMENTS** that evidence any modification of the agreement not in writing and for each state the name, **ADDRESS**, and telephone number of each **PERSON** who has the **DOCUMENT**.
- 50.2 Was there a breach of any agreement alleged in the pleadings? If so, for each breach describe and give the date of every act or omission that you claim is the breach of the agreement.
- 50.3 Was performance of any agreement alleged in the pleadings excused? If so, identify each agreement excused and state why performance was excused.
- 50.4 Was any agreement alleged in the pleadings terminated by mutual agreement, release, accord and satisfaction, or novation? If so, identify each agreement terminated, the date of termination, and the basis of the termination.
- 50.5 Is any agreement alleged in the pleadings unenforceable? If so, identify each unenforceable agreement and state why it is unenforceable.
- 50.6 Is any agreement alleged in the pleadings ambiguous? If so, identify each ambiguous agreement and state why it is ambiguous.
- 60.0 [Reserved]

- 1 A. David Kagon
- 2 A.C. Warnack, as Trustee of The A.C. Warnack Trust
- 3 A.V. United Mutual Group
- 4 Abc Williams Enterprises Lp
- 5 Adams Bennett Investments, LLC
- 6 Airtrust Singapore Private Limited
- 7 Alex Wodchis
- 8 Allen Alevy
- 9 Alta Vista SunTower, LLC
- 10 Anaverde LLC
- 11 Andreas Hauke
- 12 Andrews, Franklin D.
- 13 Andrews, Treba
- 14 Angelo and Dolores M. Cassara as Trustees of the Cassara Marital Trust
- 15 Antelope Valley Country Club Improvement Company, Inc.
- 16 Antelope Valley East-Kern Water Agency
- 17 Antelope Valley Ground Water Agreement Association
- 18 Antelope Valley Joint Union High School District
- 19 Antelope Valley Water Company
- 20 Antelope Valley Water Storage LLC
- 21 Antonio U. Agustines
- 22 Arklin Brothers Enterprises
- 23 Arklin, Philip H.
- 24 Aurora P. Gabuya
- 25 Av Materials, Inc.
- 26 AV Solar Ranch 1, LLC
- 27 B. J. Calandri
- 28 Balice, Maria

- 1 Balice, Norman
- 2 Barbara L. Keys
- 3 Barry S. Munz
- 4 Betty Gluckstein
- 5 Beverly J. Tobias
- 6 Big Rock Mutual Water Company
- 7 Big West Corp.
- 8 Billy H. Kim
- 9 Blayney, Randall
- 10 Bloom, Melody
- 11 Bolthouse Properties, LLC.
- 12 Bong S. Chang
- 13 Boron Community Services District
- 14 Boruchin, as Trustee for the John and Dora Boruchin Living Trust, John
- 15 Britton Associates, LLP
- 16 Bruce Burrows
- 17 Bujulian Brothers, Inc.
- 18 Burrows, Bruce - 300 A 40 H, LLC
- 19 Bushnell Enterprises, LLC
- 20 C.C. Thelma Cole
- 21 Cabahug, Jaime and Arlene
- 22 California Portland Cement Company
- 23 California, State Of
- 24 Calmat Land Co.
- 25 Calmat Land Company
- 26 Cameron Properties
- 27 Cameron Properties
- 28 Carol K. Claypool

- 1 Castle Butte Dev Corp
- 2 Catellus Development Corporation
- 3 Catharine M. Davis
- 4 Cenon Advincula
- 5 Chan, Hawk Nin - Self-Representing
- 6 Cheng Lin Kang
- 7 Chi S. Huang
- 8 City National Bank, Trustee
- 9 Clifford N. Claypool
- 10 Collicutt, Ikuku
- 11 Consolidated Rock Products
- 12 Consolidated Rock Products Co.
- 13 Copa De Oro Land Company, a California general partnership
- 14 County Sanitation District No. 14
- 15 County Sanitation District No. 20
- 16 Crail, Charles
- 17 Crail, Jean B.
- 18 Crystal Organic Farms LLC
- 19 Daniel Saparzadeh
- 20 Daryush Iraninezhad
- 21 David L. Bowers
- 22 Del Sur Ranch, LLC
- 23 Delmar D. Van Dam
- 24 Desert Lakes Community Services District
- 25 Diamond Farming Company
- 26 Donna L. Higelmire
- 27 Donna L. Simpson
- 28 Dorothy Dreier

- 1 E.C. Wheeler, LLC
- 2 Eastley, Philip
- 3 Edgar C. Ritter
- 4 Elias Qamout
- 5 Elizabeth Wong
- 6 enXco Development Corporation (Sued as Roe 452)
- 7 Esfandiar Kadivar
- 8 eSolar, Inc.
- 9 Estrada, David
- 10 Estrada, Rita
- 11 Eugene B. Nebeker
- 12 Eugene Gabrych
- 13 Eva Lai
- 14 Fares A. Lahoud
- 15 Florence Cernicky as Trustee of the Cernicky Trust
- 16 Forrest G. Godde
- 17 Forrest G. Godde (Indiv & Trustee Of The Forrest G. Godde Trust)
- 18 Frank S. Chiodo
- 19 Frank T. Nguyen
- 20 Frankie H. Salomon Trust
- 21 Fredrichsen, Lewis
- 22 Fry, Ron
- 23 Gailen Kyle
- 24 Gailen W. Kyle (Indiv & Trustee Of The Kyle Trust)
- 25 Gareth L. Simpson
- 26 Gaskell SunTower, LLC
- 27 Gateway Triangle Properties
- 28 Genus Lp

CHARLTON WEEKS LLP
1031 West Avenue M-14, Suite A
Palmdale, CA 93551

- 1 George C. Stevens, Jr.
- 2 George C. Stevens, Jr. as Trustee of the George C. Stevens, Jr. Trust
- 3 George E. Dreier
- 4 George L. Stimson, Jr.
- 5 Georgine J. Archer
- 6 Gertrude J. Van Dam
- 7 Ggf Llc
- 8 GLDEN SANDS MOBILE HOME PARK
- 9 Grimmway Enterprises, Inc.
- 10 Guss A. Barks, Jr.
- 11 Hancock, Catherine
- 12 Hancock, Timothy
- 13 Harbaugh, Barry
- 14 Harris, Steven
- 15 Healy Enterprises, Inc.
- 16 Helen Stathatos
- 17 Helen Stathatos
- 18 Henry Ngo
- 19 Herbert Katz
- 20 Herrmann, David
- 21 High Desert Investments, LLC
- 22 Hines Family Trust
- 23 Hong Dong
- 24 Hooshpack Dev Inc.
- 25 Huth, Clinto
- 26 Hypericum Interests Llc
- 27 Iannaccone, Elizabeth - Pro-per
- 28 Ildefonso S. Bayani

- 1 Illy King
- 2 J. Cole
- 3 Jack D. Kahlo
- 4 Jacob Chetrit
- 5 Jacqueline Ackerman
- 6 James W. Kyle
- 7 James W. Kyle (Indiv & Trustee Of The Kyle Family Trust)
- 8 Jeanna Y. Chang
- 9 Joan A. Funk
- 10 John A. Calandri (Indiv & As Trustee Of The John And B.J. Calandri 2001 Trust)
- 11 John Calandri
- 12 John Hui
- 13 Joseph H. Gluckstein
- 14 Juanita R. Nichols
- 15 Julia Kyle
- 16 Jung N. Tom
- 17 Jung, Irene
- 18 Jung, Paul
- 19 Kamram S. Shakib
- 20 Kathleen M. Munz
- 21 Kazuko Yoshimatsu
- 22 Keith E. Wales
- 23 Kootenai Properties, Inc.
- 24 Kutu Investment Co.
- 25 L. Gorrindo
- 26 Land Business Corporation
- 27 Landfield, Richard
- 28 Landinv, Inc.

- 1 Lapis Land Company, LLC
- 2 Lawrence A. Godde
- 3 Lawrence A. Godde (Indiv & Trustee Of Lawrence A. Godde Trust)
- 4 Lawrence Charles Trust
- 5 Lebata, Inc.
- 6 Leduc, Larry V.
- 7 Leduc, Sonia S.
- 8 Lee S. Chiou
- 9 Leroy Daniel Bronston
- 10 Leslie Property
- 11 Lewis Fredrichsen
- 12 Light Andrew & Youngnam
- 13 Lilian S. Kaufman
- 14 Little Baldy Mutual Water Company
- 15 Littlerock Aggregate Co., Inc. dba Antelope Valley Aggregate, Inc.
- 16 Llano Mutual Water Company
- 17 Llano-Del Rio Water Company
- 18 Los Angeles County Sanitation Districts
- 19 Lu, Clark C.
- 20 Lu, Danny C.
- 21 Lyman C. Miles
- 22 Lyon, Alice
- 23 M. R. Nasir
- 24 M. S. Chung
- 25 Malloy Family Partners
- 26 Mally Family Partners Lp
- 27 Man C. Lo
- 28 Maria B. Gorrindo

- 1 Marian Gabrych
- 2 Marianne Katz
- 3 Marilyn Burgess
- 4 Marilyn Hauke
- 5 Marilyn J. Prewoznik
- 6 Mark E. Thompson Apc Sharing Plan
- 7 Mark H. Shafron
- 8 Martin Schwartz
- 9 Marwan M. Aldais
- 10 Mary Wong
- 11 Marygrace H. Santoro
- 12 Marygrace H. Santoro (Indiv & Trustee Of The Marygrace H. Santoro Rev Trust)
- 13 Mashallah Afshar
- 14 Mason, David S.
- 15 Mathis, Joe
- 16 Matsui, Jeanne
- 17 Maurice H. Stans
- 18 Max Webb Trustee of the Webb Trust of 1978
- 19 Melinda E. Cameron
- 20 Melinda L. Gillman, Trustee of the Grubb Family Trust
- 21 Melody S. Bloom
- 22 Melvin Thomas Andrews and Margaret E. Andrews, Trustees of the Andrews Living Trust dated
- 23 August 2, 2004
- 24 Michael N. Higelmire
- 25 Middle Butte Mine, Inc.
- 26 Mike M. Wu
- 27 Milton S. Davis
- 28 Minoo Iraninezhad

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Palmdale, CA 93551

- 1 Mission Bell Ranch Development
- 2 Mojave Public Utility District
- 3 Moon S. Chang
- 4 Morris Gluckstein
- 5 Morteza M. Foroughi
- 6 Mountain Brook Ranch, LLC
- 7 Murphy, Patty
- 8 New Anaverde, LLC
- 9 Nibbelink Family Trust
- 10 Nilda V. Bayani
- 11 Norman L. Poulsen
- 12 North Edwards Water District
- 13 Northrop Grumman Corporation (Sued As Doe 534)
- 14 Norton P. Recht, Jr.
- 15 Oliva M. Advincula
- 16 Oliver Nichols
- 17 Oscar Rudnick
- 18 Owl Properties, Inc.
- 19 Palmdale Hills Property LLC
- 20 Patricia A. Recht
- 21 Patricia J. Riggins
- 22 Paul Lai
- 23 Paula E. Ritter
- 24 Paula E. Ritter (Indiv & Trustee Of The Ritter Family Trust)
- 25 Pei Chin Lin
- 26 Peter G. Barks
- 27 Phelan Pinon Hills Community Services District
- 28 Pittman, Thomas

- 1 Prewoznik, Marilyn J.
- 2 Prewoznik, Marilyn J., as Trustee of the Marilyn J. Prewoznik Trust
- 3 R And M Ranch
- 4 Rafferty, Gary
- 5 Rafferty, Nona
- 6 Randall Y. Blayney
- 7 Raney, as Trustee for the Robert and Shirley Raney Living Trust , Robert D.
- 8 Raney, as Trustee for the Robert and Shirley Raney Living Trust , Shirley B.
- 9 Rebecca Rudnick
- 10 Red Dawn SunTower, LLC
- 11 Reinelt Rosenloecher Corp. Psp
- 12 Richard E. Landfield
- 13 Robert A. Jones
- 14 Robert L. Shafron
- 15 Rodrigo L. Gabuya
- 16 Roland N. Grubb
- 17 Romo Lake Los Angeles Partnership
- 18 Ronald E. Bowers
- 19 Rosamond Ranch
- 20 Rose Gluckstein
- 21 Rosemount Equities Llc Series
- 22 Royal Investors Group
- 23 Royal Western Properties Llc
- 24 Ruth A. Cumming
- 25 San Yu Enterprises, Inc.
- 26 Santa Monica Mountains Conservancy
- 27 Sarkis Djanibekyan
- 28 Savas Stathatos

- 1 Savas Stathatos (Indiv & Trustee Of The Stathatos Family Trust)
- 2 Service Rock Products, L.P. (originally named as Service Rock Products Corporation)
- 3 Seven Star United Llc
- 4 SGS Antelope Valley Development LLC
- 5 SHAKIB, KAMRAM
- 6 Sheep Creek Water Company
- 7 Sheldon R. Blum, Trustee for the Sheldon R. Blum Trust
- 8 Sheldon R. Blum, Trustee, for the Sheldon R. Blum Trust; & Sheldon R. Blum, Individually
- 9 Sheng Tom
- 10 Shiung Ru Lo
- 11 Shokrian, Elias
- 12 Shokrian, Shirley
- 13 Sierra SunTower, LLC
- 14 Simin C. Neman
- 15 Soaring Vista Properties, Inc.
- 16 Sorrento West Properties, Inc.
- 17 Souad R. Nasir
- 18 Southern California Edison Company
- 19 SPC Del Sur Ranch, LLC
- 20 State Of California 50TH District And Agricultural Association
- 21 State of California; Santa Monica Mountains Conservancy; 50th District Agricultural Association
- 22 Stevens, Jr., George C.
- 23 Su, Rong
- 24 Suchu T. Huang
- 25 Tejon Ranch Company
- 26 Tejon Ranchcorp
- 27 Terry A. Munz
- 28 The Philip H. Arklin Family Trust Dated April 28, 1994

- 1 Three Arklin Limited Liability Company, The
- 2 Tierra Bonita Ranch Company
- 3 Tiong D. Tiu
- 4 Tom, Jung N.
- 5 Treacy, Patrick
- 6 Triple M Property F.K.A. 3M Property Investment Co
- 7 Trustee For The Alevy Family Trust
- 8 Trustee For The Georgine J. Archer Trust
- 9 Trustee For The Kagon Trust
- 10 Trustee For The Katz Family Trust
- 11 Trustee For The Lilian S. Kaufman Trust
- 12 Trustee For The M. Gorrindo Trust
- 13 Trustee For The Marygrace H. Santoro Rev Trust
- 14 Trustee For The Miles Family Trust
- 15 Trustee For The P C Rev Inter Vivos Trust
- 16 Trustee For The Stathatos Family Trust
- 17 Trustee For The T.J. Cole Trust
- 18 Trustee Of The Barbara L. Keys Family Trust
- 19 Trustee Of The Burroughs Irr Family Trust
- 20 Trustee Of The Cumming Family Trust
- 21 Trustee Of The Foroughi Family Trust
- 22 Trustee Of The Forrest G. Godde Trust
- 23 Trustee Of The Fredrichsen Family Trust
- 24 Trustee Of The George C. Stevens, Jr. Trust
- 25 Trustee Of The Godde Trust
- 26 Trustee Of The Grubb Family Trust
- 27 Trustee Of The Illy King Family Trust
- 28 Trustee Of The John And B.J. Calandri 2001 Trust

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- 1 Trustee Of The Kadivar Family Trust
- 2 Trustee Of The Kyle Family Trust
- 3 Trustee Of The Kyle Trust
- 4 Trustee Of The Marilyn J. Prewoznik Trust
- 5 Trustee Of The Nichols Family Trust
- 6 Trustee Of The Richard E. Landfield Trust
- 7 Trustee Of The Riggins Family Trust
- 8 Trustee Of The Ritter Family Trust
- 9 Trustee Of The Simpson Family Trust
- 10 Trustee Of The Tobias Family Trust
- 11 Trustee Of The Trueblood Family Trust
- 12 Trustee Of The Wu Family Trust
- 13 Tumbleweed SunTower, LLC
- 14 U.S. Borax, Inc.
- 15 Unison Investment Co., Llc
- 16 Valentine, Roland
- 17 Van Dam, Craig
- 18 Van Dam, Delmar D.
- 19 Van Dam, Gary
- 20 Van Dam, Gertrude J.
- 21 Veronika Reinelt
- 22 Victoria Rahimi
- 23 W. F. Clumen, Jr.
- 24 WAGAS Land Company LLC
- 25 Walter E. Helmick
- 26 Wanda E. Kyle
- 27 WDS California II, LLC
- 28 White Fence Farms Mutual Water Co. Inc.

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- 1 William Bolthouse Farms, Inc.
- 2 Willis, Rebecca Lee
- 3 Wilma D. Trueblood
- 4 Wm. Bolthouse Farms, Inc.
- 5 Wood, Richard A.
- 6 Ying Wah Lam
- 7 Ying X. Dong
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3 **PROOF OF SERVICE**

4 I am employed in the aforesaid county, State of California; I am over eighteen years of age
5 and not a party to the within action; my business address is 1031 West Avenue M-14, Suite A,
6 Palmdale, California, 93551.

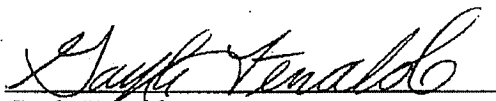
7 On November 11, 2011, at my place of business at Palmdale, California, a copy of the
8 following DOCUMENT(s):

9 FORM INTERROGATORIES (Set Two)

10 By posting the DOCUMENT listed above to the Santa Clara Superior Court website in regard to
11 the Antelope Valley Groundwater Matter:

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

14 Executed on November 11, 2011

15 
16 Gayle Fenald

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PROOF OF SERVICE
FORM INTERROGATORIES

CHARLTON WEEKS LLP
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