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Stockton, CA 95207  
4 Telephone: (209) 472-7700  
Facsimile: (209) 472-7986

5 Attorneys for Cross-Defendant  
6 ANTELOPE VALLEY WATER STORAGE, LLC

7  
8 **SUPERIOR COURT OF CALIFORNIA**  
9 **COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

10  
11 Coordination Proceeding  
Special Title (Rule 1550(b))

Judicial Council Coordination Proceeding No.  
4408

12 **ANTELOPE VALLEY GROUNDWATER**  
13 **CASES**

Santa Clara Case No. 1-05-CV-049053  
The Honorable Jack Komar, Dept. 17

14 Included actions:

**ANTELOPE VALLEY WATER STORAGE,  
LLC'S REQUEST TO GRIMMWAY  
ENTERPRISES, INC. TO PRODUCE  
WITNESSES AND DOCUMENTS AT  
TRIAL**

15 Los Angeles County Waterworks District No.  
16 40 v. Diamond Farming Company, a  
corporation, Superior Court of California,  
County of Los Angeles, Case No. BC325201;

Trial Date: May 28, 2013  
Time: 9:00 a.m.  
Dept: 1

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

21 Wm. Bolthouse Farms, Inc. v. City of  
Lancaster, Diamond Farming Company, a  
22 corporation, v. City of Lancaster, Diamond  
Farming Company, a corporation vs. Palmdale  
23 Water District, Superior Court of California,  
County of Riverside, Case Nos. RIC 353840,  
24 RIC 344436, RIC 344668.

25 TO GRIMMWAY ENTERPRISES, INC. AND ITS ATTORNEYS OF RECORD:

26 NOTICE IS HEREBY GIVEN that pursuant to Code of Civil Procedure §1987(b) and  
27 (c), Antelope Valley Water Storage, LLC ("AVWS") requests that Grimmway Enterprises, Inc.  
28 ("GEI") produce witness Carl F. Voss, Jr. at the trial of the above-captioned matter on May 28,

1 2013 at 9:00 a.m., in Department 1 of the Los Angeles County Superior Court, located at 111 N.  
2 Hill Street, Los Angeles, California, the Honorable Jack Komar presiding, or, if the trial is  
3 continued, trailed, or transferred to another location by order of the court, at the new date, time,  
4 and location set by the court, to testify as witnesses in this action. Arrangements may be made  
5 with the law firm of Herum Crabtree in writing for a scheduled appearance after a courtroom is  
6 assigned on or after May 28, 2013.

7 PLEASE TAKE FURTHER NOTICE that pursuant to Code of Civil Procedure §1987(c),  
8 AVWS requests that GEI produce the original documents listed below in GEI's possession or  
9 under its control, at the trial of the above-captioned matter at the time and place listed above.

### 10 DEFINITIONS

11 1. The term "DOCUMENT" means all written or graphic matter, however produced,  
12 or reproduced, of every kind and description in YOUR actual or constructive possession,  
13 custody, care or control, including, without limitation, all writings, drawings, graphs, charts,  
14 photographs, blueprints, sketches, sound tapes or recordings, video tapes or recordings, papers,  
15 books, accounts, letters, microfilm, magnetic tape, laser discs, magnetic discs, magnetic strips,  
16 optical recognition characters, punched paper tapes, microfiche, punched cards, telegrams, wires,  
17 cables, invoices, statements, account recommendations, notes, minutes, purchase orders,  
18 memoranda including intercorporate, intra corporate, interoffice, and intra office memoranda,  
19 reports, studies, contracts, agreements, correspondence, ledgers, books of account, vouchers,  
20 bank checks, manifests, charge slips, expense account reports, hotel charges, receipts, working  
21 papers, drafts, maps, surveys, plats, statistical records, cost sheets, stenographer notebooks,  
22 calendars, appointment books, diaries, time sheets or logs, computer printouts, computer files,  
23 computer discs, electronic mail, websites, computer or other data compilations from which  
24 information can be obtained or translated through detection devices into reasonably usable form,  
25 or any other tangible thing that constitutes or contains matters contained within the scope of  
26 "writings" as defined by California Evidence Code § 250.

27 2. The term "RELATE" means to evidence, recount, reflect, report, identify,  
28 describe, refer, discuss, summarize, explain or modify.

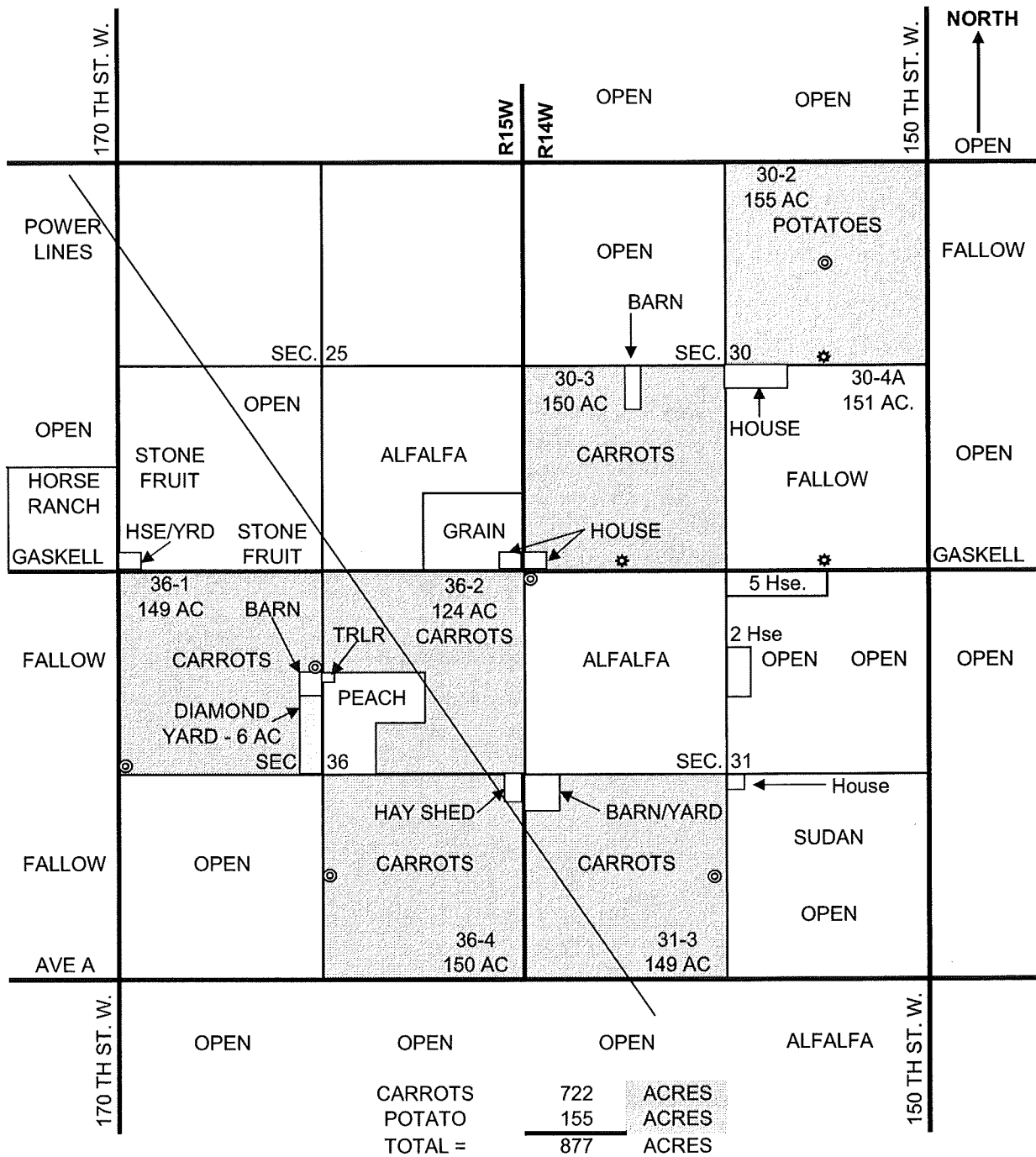


**EXHIBIT A**

12/7/99

VAN DAM RANCH  
KERN COUNTY  
T9N R14W/15W

SUMMER 2000



⊙ WELLS  
\* TURNOUT

DIAMOND FARMING COMPANY  
P. O. BOX 81498  
BAKERSFIELD, CA. 93380-1498  
(661) 845-5200

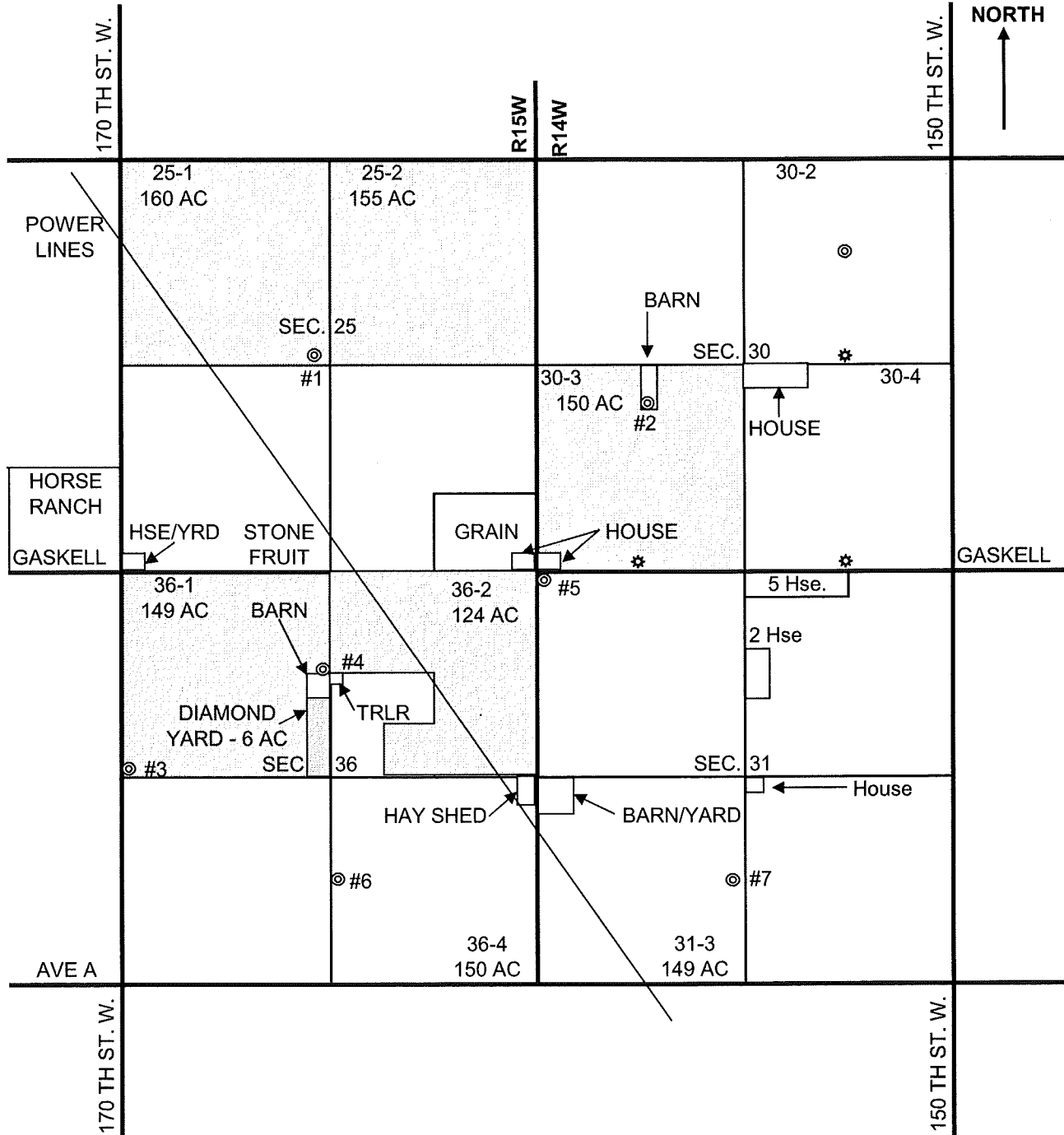
AVWS000001

EXHIBIT A

**EXHIBIT B**

VAN DAM RANCH  
KERN COUNTY

T9N R14W/15W



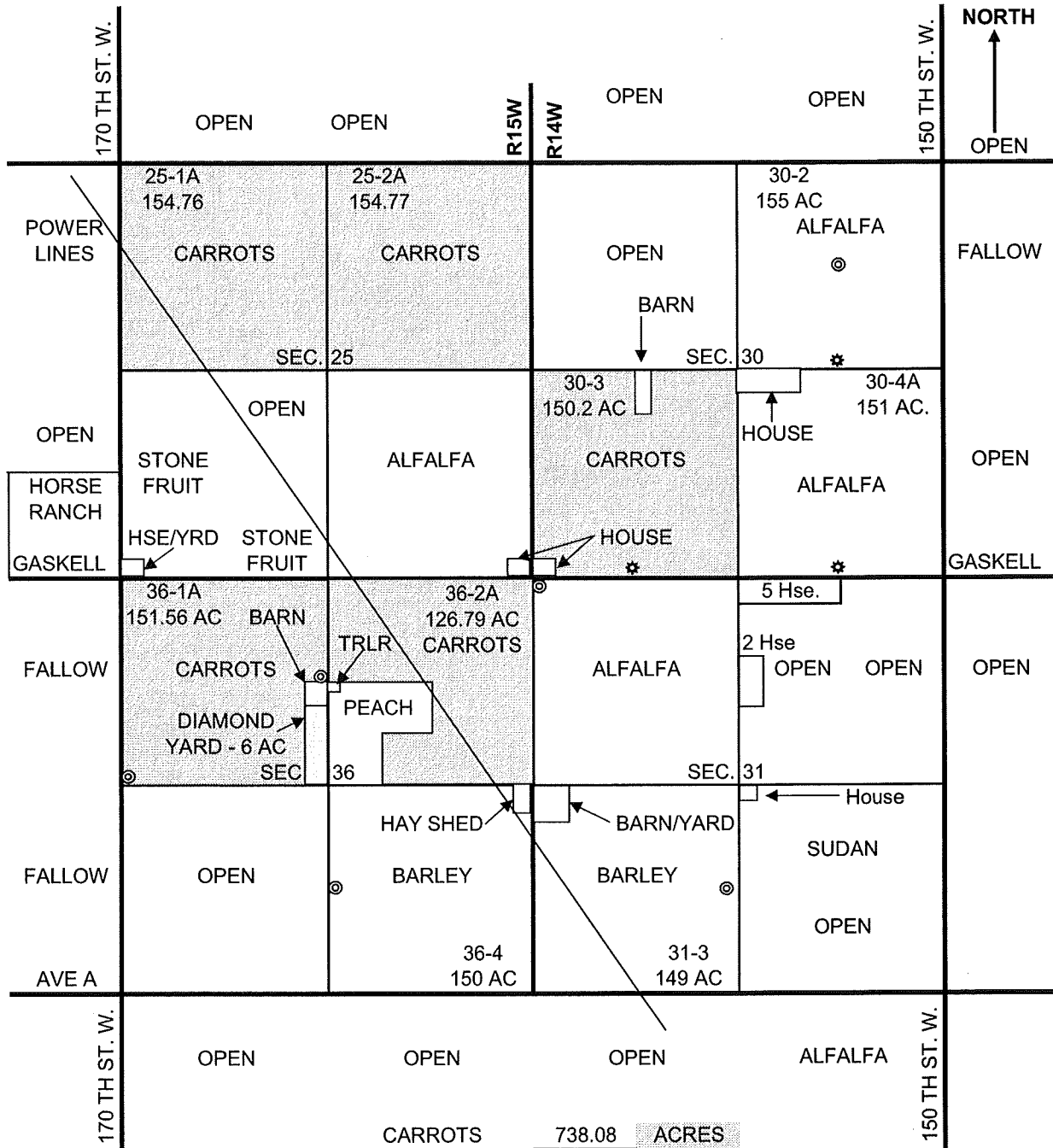
DIAMOND FARMING  
P.O. BOX 81498

Van Dam 2001-No GEI Crops BAKERSFIELD, CA 93380-1498  
Van Dam - AVWSLLC Crop Maps 2000-2004.xls (661) 845-5200

AVWS000002

**EXHIBIT C**





⊙ WELLS  
\* TURNOUT

DIAMOND FARMING COMPANY  
P. O. BOX 81498  
BAKERSFIELD, CA. 93380-1498  
(661) 845-5200

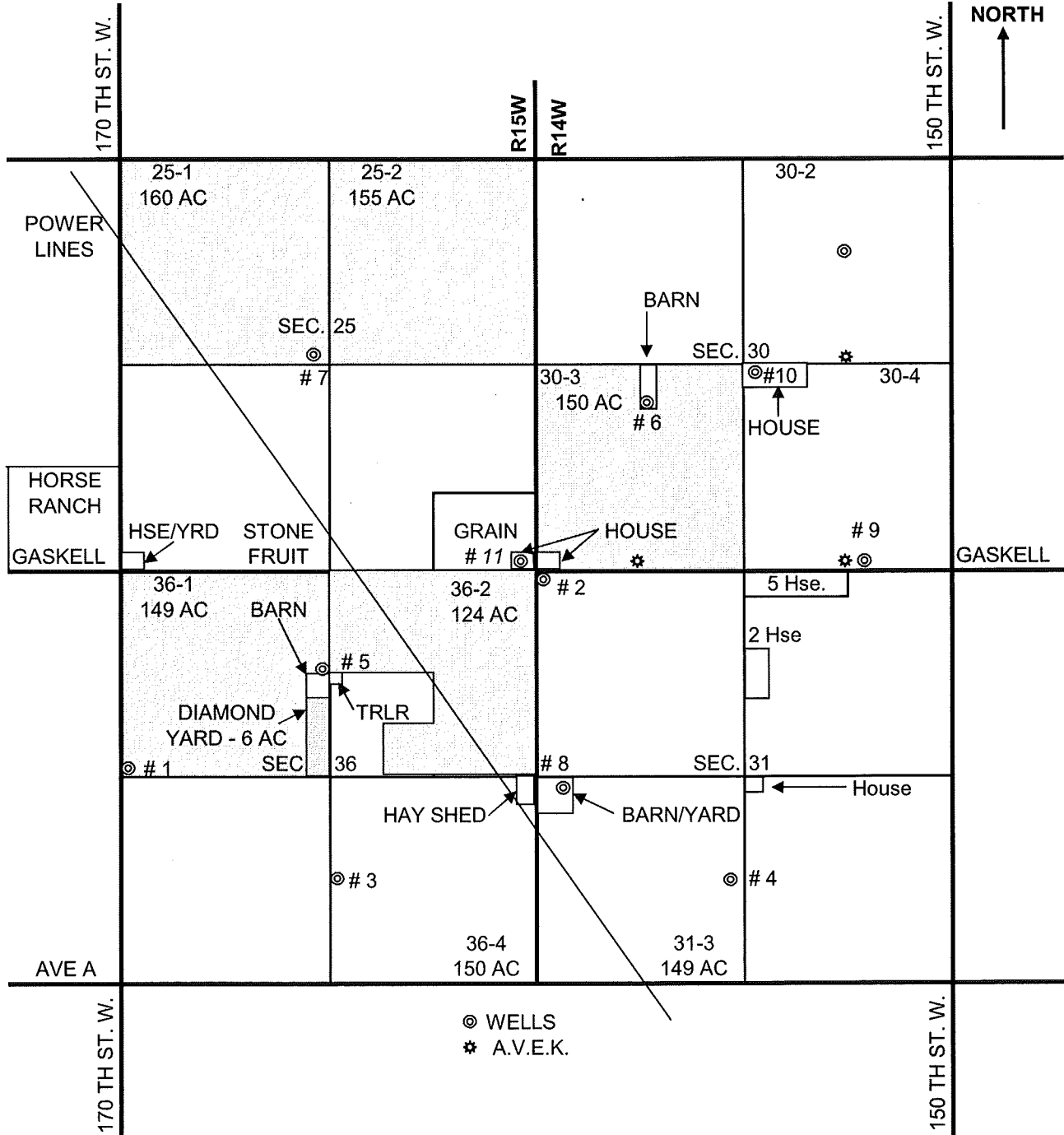
AVWS000003

EXHIBIT C

**EXHIBIT D**

VAN DAM RANCH  
KERN COUNTY

T9N R14W/15W



DIAMOND FARMING  
P.O. BOX 81498

Van Dam 2003-No GEI Crops

BAKERSFIELD, CA 93380-1498

Van Dam - AVWSLLC Crop Maps 2000-2004.xls (661) 845-5200

AVWS000004

EXHIBIT D

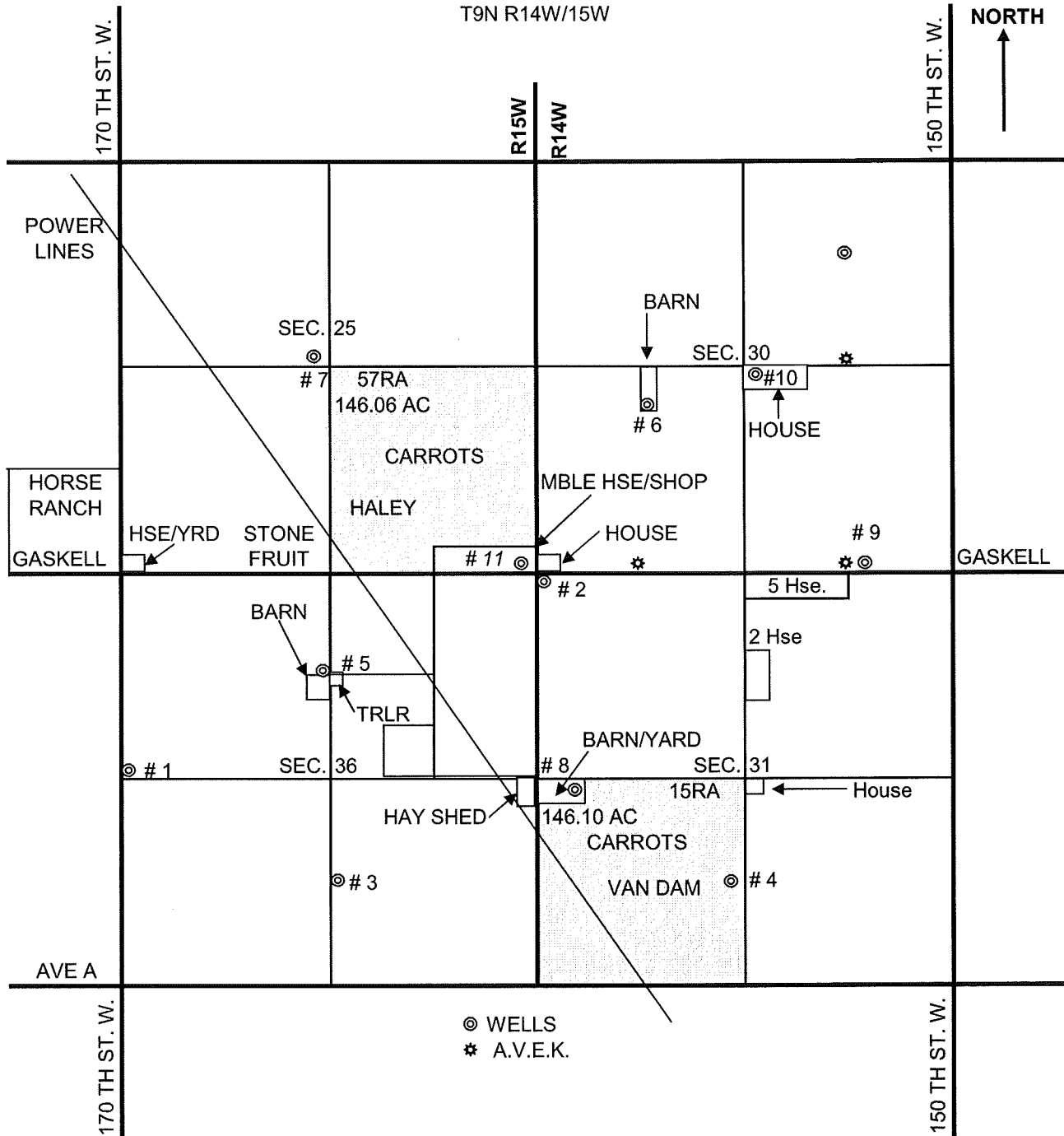
**EXHIBIT E**

VAN DAM/HALEY RANCH

KERN COUNTY

04VD

T9N R14W/15W



⊙ WELLS  
 \* A.V.E.K.

|         |               |       |
|---------|---------------|-------|
| CARROTS | 292.16        | ACRES |
| TOTAL=  | <u>292.16</u> |       |

GRIMMWAY ENTERPRISES, INC.  
 P.O. BOX 81498  
 BAKERSFIELD, CA 93380-1498

Van Dam 2004  
 Van Dam - AVWSLLC Crop Maps 2000-2004.xls (661) 845-5704

AVWS000005

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**PROOF OF SERVICE**

I, Carol Bracken, certify and declare:

I am over the age of 18 years and not a party to this action. My business address is: HERUM \ CRABTREE, 5757 Pacific Avenue, Suite 222, Stockton, California 95207. On the date set forth below, I served the following document(s):

**ANTELOPE VALLEY WATER STORAGE LLC'S RESPONSE TO AVEK'S MOTION IN LIMINE RE ADMISSION OF EVIDENCE AND ARGUMENT RELATING TO RETURN FLOWS**

**[X] BY ELECTRONIC SERVICE.** By posting the document(s) listed above to the Santa Clara Superior Court website regarding the Antelope Valley Groundwater matter (Judicial Council Coordination Proceeding No. 4408, Santa Clara Case No. 1-05-CV-049053) pursuant to the Court's Clarification Order.

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

Dated: May 3, 2013

  /s/ Carol Bracken  
CAROL BRACKEN