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5 Attorneys for Defendants/Cross-Complainants

6 LITTLEROCK CREEK IRRIGATION DISTRICT, PALM RANCH IRRIGATION DISTRICT
And Cross-Defendants, NORTH EDWARDS WATER DISTRICT and DESERT LAKES COMMUNITY
7 SERVICES DISTRICT

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

9 **IN AND FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

11 Coordinated Proceeding)
Special Title (Rule 1550(b)))

12 ANTELOPE VALLEY GROUNDWATER)
13 CASES)

14 Included Actions:)

15 Los Angeles County Waterworks District No. 40)
16 v. Diamond Farming Co. Los Angeles County)
17 Superior Court Case No. BC 325201;)

18 Los Angeles County Waterworks District No. 40)
19 v. Diamond Farming Co., Kern County Superior)
Court, Case No. S-1500-CV-234348;)

20 Wm. Bolthouse Farms, Inc. v. City of Lancaster)
21 Diamond Farming Co. v. City of Lancaster v.)
22 Palmdale Water District, Riverside County)
Superior Court, Consolidated Actions, Case Nos.)
23 RIC 353840, RIC 344436, RIC 344668)

24 AND RELATED CROSS-ACTIONS)
25)
26)
27)

Judicial Council Coordination No. 4408

) Santa Clara Case No. 1-05-CV-049053

) Assigned to the Honorable Jack Komar – Dept. 17

) **LITTLEROCK CREEK IRRIGATION**
) **DISTRICT'S RESPONSE TO DIAMOND**
) **FARMING COMPANY'S FIRST SET OF**
) **SPECIAL INTERROGATORIES**

1 PROPOUNDING PARTY: Diamond Farming Company
2 RESPONDING PARTY: Littlerock Creek Irrigation District
3 SET NUMBER: One (1-9)

4 Pursuant to California Code of Civil Procedure § 2030.010, Littlerock Creek Irrigation District
5 (“Littlerock”), hereby responds to Diamond Farming Company’s First Set of Special Interrogatories as
6 follows:

7 **I. PRELIMINARY STATEMENT**

8 1. Although Littlerock has conducted a good faith investigation in order to respond to
9 Diamond Farming’s First Set of Form Interrogatories, it has not completed its own investigation or
10 discovery of this matter. By responding to this discovery, Littlerock does not intend to preclude itself
11 from providing supplemental responses or from using, at a trial or other proceedings, information that it
12 obtains subsequent to the date of these responses.

13 2. By these responses, Littlerock makes no representation concerning the relevance or
14 admissibility of any of the evidence cited, and further reserve the right to make all pertinent evidentiary
15 objections at trial or at any other stage of the proceedings.

16 3. Littlerock objects to each interrogatory to the extent it calls for information protected by
17 the attorney-client privilege, attorney work product doctrine and official information privilege.

18 **II. RESPONSES TO SPECIAL INTERROGATORIES**

19 **RESPONSE TO SPECIAL INTERROGATORY NO. 1:**

20 Objection. The request is premature, burdensome and oppressive. This request seeks information
21 concerning class members and the court has not yet completed its class certification process. No class
22 representative has yet been approved by the court.

23 **RESPONSE TO SPECIAL INTERROGATORY NO. 2:**

24 Objection. The request is premature, burdensome and oppressive. This request seeks information
25 concerning class members and the court has not yet completed its class certification process. No class
26 representative has yet been approved by the court.

1 **RESPONSE TO SPECIAL INTERROGATORY NO. 3:**

2 Objection. The request is premature, burdensome and oppressive. This request seeks information
3 concerning class members and the court has not yet completed its class certification process. No class
4 representative has yet been approved by the court.

5 **RESPONSE TO SPECIAL INTERROGATORY NO. 4:**

6 Objection. The request is premature, burdensome and oppressive. This request seeks information
7 concerning class members and the court has not yet completed its class certification process. No class
8 representative has yet been approved by the court.

9 **RESPONSE TO SPECIAL INTERROGATORY NO. 5:**

10 Objection. The request is premature, burdensome and oppressive. This request seeks information
11 concerning class members and the court has not yet completed its class certification process. No class
12 representative has yet been approved by the court.

13 **RESPONSE TO SPECIAL INTERROGATORY NO. 6:**

14 Objection. The request is premature, burdensome and oppressive. This request seeks information
15 concerning class members and the court has not yet completed its class certification process. No class
16 representative has yet been approved by the court.

17 **RESPONSE TO SPECIAL INTERROGATORY NO. 7:**

18 Objection. The request is premature, burdensome and oppressive. This request seeks information
19 concerning class members and the court has not yet completed its class certification process. No class
20 representative has yet been approved by the court.

21 **RESPONSE TO SPECIAL INTERROGATORY NO. 8:**

22 Objection. The request is premature, burdensome and oppressive. This request seeks information
23 concerning class members and the court has not yet completed its class certification process. No class
24 representative has yet been approved by the court.

RESPONSE TO SPECIAL INTERROGATORY NO. 9:

Objection. The request is premature, burdensome and oppressive. This request seeks information concerning class members and the court has not yet completed its class certification process. No class representative has yet been approved by the court.

DATED: June 26, 2007

LEMIEUX & O'NEILL

By: _____
W. KEITH LEMIEUX
Attorneys for LITTLE ROCK CREEK IRRIGATION
DISTRICT and PALM RANCH IRRIGATION DISTRICT

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA,)
3) ss.
4 COUNTY OF VENTURA)

5 I am employed in the County of Ventura, State of California. I am over the age of 18 and not a
6 party to the within action. My business address is 2393 Townsgate Road, Suite 201, Westlake Village,
California 91361.

7 On **June 26, 2007**, I posted the following document(s) to the website <http://www.scefilng.org>, a
8 dedicated link to the Antelope Valley Groundwater Cases:

9
10 **LITTLEROCK CREEK IRRIGATION DISTRICT’S RESPONSE TO DIAMOND FARMING**
11 **COMPANY’S FIRST SET OF SPECIAL INTERROGATORIES**

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

14 Executed on June 26, 2007, in Westlake Village, California.

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16 _____
17 KATHI MIERS
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