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8 Attorneys for Defendants/Cross-Complainants

9 LITTLEROCK CREEK IRRIGATION DISTRICT, PALM RANCH IRRIGATION DISTRICT
10 And Cross-Defendants, NORTH EDWARDS WATER DISTRICT and DESERT LAKES COMMUNITY
11 SERVICES DISTRICT

12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

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

14 Coordinated Proceeding)
15 Special Title (Rule 1550(b)))

16 ANTELOPE VALLEY GROUNDWATER)
17 CASES)

18 Included Actions:)

19 Los Angeles County Waterworks District No. 40)
20 v. Diamond Farming Co. Los Angeles County)
21 Superior Court Case No. BC 325201;)

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

25 Wm. Bolthouse Farms, Inc. v. City of Lancaster)
26 Diamond Farming Co. v. City of Lancaster v.)
27 Palmdale Water District, Riverside County)
28 Superior Court, Consolidated Actions, Case Nos.)
RIC 353840, RIC 344436, RIC 344668)

AND RELATED CROSS-ACTIONS)
_____)

Judicial Council Coordination No. 4408

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

Assigned to the Honorable Jack Komar – Dept. 17

**PALM RANCH IRRIGATION DISTRICT'S
RESPONSE TO DIAMOND FARMING
COMPANY'S FIRST SET OF FORM
INTERROGATORIES**

1 PROPOUNDING PARTY: Diamond Farming Company
2 RESPONDING PARTY: Palm Ranch Irrigation District
3 SET NUMBER: One

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

6 **I. PRELIMINARY STATEMENT**

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

12 2. Palm Ranch objects to each interrogatory to the extent it calls for information protected by
13 the attorney-client privilege, attorney work product doctrine and official information privilege.

14 **II. RESPONSES TO FORM INTERROGATORIES**

15 **RESPONSE TO FORM INTERROGATORY NO. 1.1:**

16 W. Keith Lemieux, Lemieux & O’Neill, 2393 Townsgate Road, Suite 201, Westlake Village,
17 California. (805) 495-4770.

18 **RESPONSE TO INTERROGATORY NO. 17.1:**

19 All responses to requests for admissions are objections by legal counsel.

20 DATED: June 26, 2007

LEMIEUX & O'NEILL

21 /s/

22 By: _____

23 W. KEITH LEMIEUX

24 Attorneys for LITTLE ROCK CREEK IRRIGATION
25 DISTRICT and PALM RANCH IRRIGATION DISTRICT

PROOF OF SERVICE

STATE OF CALIFORNIA,)
) ss.
COUNTY OF VENTURA)

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

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

PALM RANCH IRRIGATION DISTRICT'S RESPONSE TO DIAMOND FARMING COMPANY'S FIRST SET OF FORM INTERROGATORIES

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

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

/s/

KATHI MIERS