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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 SPECIAL  
INTERROGATORIES**

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

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 Special Interrogatories as  
6 follows:

7 **I. PRELIMINARY STATEMENT**

8 1. Although Palm Ranch 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, Palm Ranch 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, Palm Ranch 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. Palm Ranch 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,  
7 California 91361.

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

10 **PALM RANCH 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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