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Attorneys for Defendants/Cross-Complainants

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

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT

Coordinated Proceeding
Special Title (Rule 1550(b))

) **Judicial Council Coordination No. 4408**

)

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

) Assigned to the Honorable Jack Komar – Dept. 17

)

ANTELOPE VALLEY GROUNDWATER
CASES

)

Included Actions:

) **PALM RANCH IRRIGATION DISTRICT'S
RESPONSE TO DIAMOND FARMING
COMPANY'S FIRST SET OF REQUESTS
FOR ADMISSIONS**

)

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

)

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

)

)

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

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AND RELATED CROSS-ACTIONS

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PROPOUNDING PARTY: Diamond Farming Company
RESPONDING PARTY: Palm Ranch Irrigation District
SET NUMBER: One (Nos. 1-60)

Pursuant to California Code of Civil Procedure § 2033.10, Palm Ranch Irrigation District hereby responds to Diamond Farming Company's First Set of Requests for Admissions as follows:

I. PRELIMINARY STATEMENT

1. Although Palm Ranch has conducted a good faith investigation in order to respond to these Admissions, it has not completed its own investigation or discovery of this matter. By responding to this discovery, Palm Ranch does not intend to preclude itself from providing supplemental responses or from using, at a trial or other proceedings, information that it obtains subsequent to the date of these responses.

2. By these responses, Palm Ranch makes no admission concerning the relevance or admissibility of any of the evidence cited, and further reserves the right to make all pertinent evidentiary objections at trial or at any other stage of the proceedings.

II. OBJECTIONS

1. Palm Ranch objects to each request to the extent it calls for information protected by the attorney-client or official information privileges or attorney work product doctrine.

III. RESPONSES TO REQUEST FOR ADMISSIONS

RESPONSE TO REQUEST FOR ADMISSION NO. 1:

Objection. This request is not reasonably calculated to lead to the discovery of admissible evidence. The request is manifestly irrelevant and calculated to harass.

RESPONSE TO REQUEST FOR ADMISSION NO. 2:

Deny.

RESPONSE TO REQUEST FOR ADMISSION NO. 3:

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.

RESPONSE TO REQUEST FOR ADMISSION NO. 4:

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.

RESPONSE TO REQUEST FOR ADMISSION NO. 5:

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RESPONSE TO REQUEST FOR ADMISSION NO. 6:

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RESPONSE TO REQUEST FOR ADMISSION NO. 7:

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RESPONSE TO REQUEST FOR ADMISSION NO. 8:

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RESPONSE TO REQUEST FOR ADMISSION NO. 9:

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DATED: June 26, 2007

LEMIEUX & O'NEILL

/s/

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 **PALM RANCH IRRIGATION DISTRICT'S RESPONSE TO DIAMOND FARMING**
11 **COMPANY'S FIRST SET OF REQUEST FOR ADMISSIONS**

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.

15 /s/

16 _____
17 KATHI MIERS
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