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Attorneys for Defendants/Cross-Complainants		
LITTLEROCK CREEK IRRIGATION DISTRICT, And Cross-Defendants, NORTH EDWARDS WAT		
SERVICES DISTRICT		
SUPERIOR COURT OF TH	IE STATE OF CALIFORNIA	
IN AND FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT		
Coordinated Proceeding	Judicial Council Coordination No. 4408	
Special Title (Rule 1550(b))	Santa Clara Case No. 1-05-CV-049053	
ANTELOPE VALLEY GROUNDWATER CASES	Assigned to the Honorable Jack Komar – Dept. 17	
Included Actions:	PALM RANCH IRRIGATION DISTRICT'	
Los Angeles County Waterworks District No. 40	RESPONSE TO DIAMOND FARMING COMPANY'S FIRST SET OF REQUESTS	
v. Diamond Farming Co. Los Angeles County Superior Court Case No. BC 325201;	FOR ADMISSIONS	
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		
AND RELATED CROSS-ACTIONS		
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1	PROPOUNDING PARTY:	Diamond Farming Company	
2	RESPONDING PARTY:	Palm Ranch Irrigation District	
3	SET NUMBER:	One (Nos. 1-60)	
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5	Pursuant to California Code of	of Civil Procedure § 2033.10, Palm Ranch Irrigation District hereby	
6	responds to Diamond Farming Company's First Set of Requests for Admissions as follows:		
7	I. PRELIMINARY STATEMENT		
8	1. Although Palm Ranch	has conducted a good faith investigation in order to respond to these	
9	Admissions, it has not completed its own investigation or discovery of this matter. By responding to this		
10	discovery, Palm Ranch does not inte	nd to preclude itself from providing supplemental responses or from	
11	using, at a trial or other proceedings,	information that it obtains subsequent to the date of these responses.	
12	2. By these responses, P	alm Ranch makes no admission concerning the relevance or	
13	admissibility of any of the evidence cited, and further reserves the right to make all pertinent evidentiary		
14	objections at trial or at any other stage of the proceedings.		
15	II. OBJECTIONS		
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	1. Palm Ranch objects to	b each request to the extent it calls for information protected by the	
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16 17	attorney-client or official information	o each request to the extent it calls for information protected by the	
16 17 18	attorney-client or official information	to each request to the extent it calls for information protected by the n privileges or attorney work product doctrine. DNSES TO REQUEST FOR ADMISSIONS	
16 17 18 19	attorney-client or official information III. RESPO RESPONSE TO REQUEST FOR	to each request to the extent it calls for information protected by the n privileges or attorney work product doctrine. DNSES TO REQUEST FOR ADMISSIONS	
16 17 18 19 20	attorney-client or official information III. RESPO RESPONSE TO REQUEST FOR	to each request to the extent it calls for information protected by the n privileges or attorney work product doctrine. DNSES TO REQUEST FOR ADMISSIONS ADMISSION NO. 1: of reasonably calculated to lead to the discovery of admissible	
16 17 18 19 20 21	attorney-client or official information III. RESPO RESPONSE TO REQUEST FOR Objection. This request is no	o each request to the extent it calls for information protected by the n privileges or attorney work product doctrine. DNSES TO REQUEST FOR ADMISSIONS ADMISSION NO. 1: ot reasonably calculated to lead to the discovery of admissible rrelevant and calculated to harass.	
 16 17 18 19 20 21 22 	attorney-client or official information III. RESPO RESPONSE TO REQUEST FOR Objection. This request is no evidence The request is manifestly i	o each request to the extent it calls for information protected by the n privileges or attorney work product doctrine. DNSES TO REQUEST FOR ADMISSIONS ADMISSION NO. 1: ot reasonably calculated to lead to the discovery of admissible rrelevant and calculated to harass.	
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representative has yet been approved by the court. 1

2 **RESPONSE TO REQUEST FOR ADMISSION NO. 4:**

3 Objection. The request is premature, burdensome and oppressive. This request seeks information 4 concerning class members and the court has not yet completed its class certification process. No class 5 representative has yet been approved by the court.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 5:**

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.

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RESPONSE TO REQUEST FOR ADMISSION NO. 6:

Objection. The request is premature, burdensome and oppressive. This request seeks information 11 12 concerning class members and the court has not yet completed its class certification process. No class 13 representative has yet been approved by the court.

RESPONSE TO REQUEST FOR ADMISSION NO. 7:

15 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 16 17 representative has yet been approved by the court.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 8:**

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.

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RESPONSE TO REQUEST FOR ADMISSION NO. 9:

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

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RESPONSE TO REQUEST FOR ADMISSION NO. 10:

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.

5 || <u>RESPONSE TO REQUEST FOR ADMISSION NO. 11</u>:

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.

<u>RESPONSE TO REQUEST FOR ADMISSION NO. 12</u>:

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 **<u>RESPONSE TO REQUEST FOR ADMISSION NO. 13</u>**:

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 REQUEST FOR ADMISSION NO. 14**:

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 **<u>RESPONSE TO REQUEST FOR ADMISSION NO. 15</u>**:

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.

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RESPONSE TO REQUEST FOR ADMISSION NO. 16:

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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.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 17:**

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 REQUEST FOR ADMISSION NO. 18:**

10 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 11 12 representative has yet been approved by the court.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 19:**

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 representative has yet been approved by the court. 16

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 20:**

18 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.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 21:**

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.

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RESPONSE TO REQUEST FOR ADMISSION NO. 22:

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.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 23:**

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.

RESPONSE TO REQUEST FOR ADMISSION NO. 24:

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 REQUEST FOR ADMISSION NO. 25:**

14 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. 26: 17

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 REQUEST FOR ADMISSION NO. 27:**

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.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 28:**

Objection. The request is premature, burdensome and oppressive. This request seeks information

27 concerning class members and the court has not yet completed its class certification process. No class PR.RspRFA1.DF.doc 28

RESPONSES TO DIAMOND FARMING CO'S FIRST SET OF REQUEST FOR ADMISSIONS

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representative has yet been approved by the court. 1

2 **RESPONSE TO REQUEST FOR ADMISSION NO. 29:**

3 Objection. The request is premature, burdensome and oppressive. This request seeks information 4 concerning class members and the court has not yet completed its class certification process. No class 5 representative has yet been approved by the court.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 30:**

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.

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RESPONSE TO REQUEST FOR ADMISSION NO. 31:

Objection. The request is premature, burdensome and oppressive. This request seeks information 11 12 concerning class members and the court has not yet completed its class certification process. No class 13 representative has yet been approved by the court.

RESPONSE TO REQUEST FOR ADMISSION NO. 32:

15 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 16 17 representative has yet been approved by the court.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 33:**

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.

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RESPONSE TO REQUEST FOR ADMISSION NO. 34:

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

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RESPONSES TO DIAMOND FARMING CO'S FIRST SET OF REQUEST FOR ADMISSIONS

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RESPONSE TO REQUEST FOR ADMISSION NO. 35:

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.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 36:**

6 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 7 8 representative has yet been approved by the court.

RESPONSE TO REQUEST FOR ADMISSION NO. 37:

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 REQUEST FOR ADMISSION NO. 38:**

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 representative has yet been approved by the court.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 39:**

18 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.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 40:**

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.

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RESPONSE TO REQUEST FOR ADMISSION NO. 41:

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.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 42:**

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.

RESPONSE TO REQUEST FOR ADMISSION NO. 43:

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 REQUEST FOR ADMISSION NO. 44:**

14 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. 45: 17

18 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 20 representative has yet been approved by the court.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 46:**

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.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 47:**

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 PR.RspRFA1.DE.doc -9 – 27 PR.RspRFA1.DF.doc 28

RESPONSES TO DIAMOND FARMING CO'S FIRST SET OF REQUEST FOR ADMISSIONS

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1 || representative has yet been approved by the court.

2 **<u>RESPONSE TO REQUEST FOR ADMISSION NO. 48</u>**:

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

6 RESPONSE TO REQUEST FOR ADMISSION NO. 49:

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.

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RESPONSE TO REQUEST FOR ADMISSION NO. 50:

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

RESPONSE TO REQUEST FOR ADMISSION NO. 51:

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

18 **<u>RESPONSE TO REQUEST FOR ADMISSION NO. 52</u>**:

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.

22 RESPONSE TO REQUEST FOR ADMISSION NO. 53:

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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.

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RESPONSE TO REQUEST FOR ADMISSION NO. 54:

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.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 55:**

6 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 7 8 representative has yet been approved by the court.

RESPONSE TO REQUEST FOR ADMISSION NO. 56:

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 REQUEST FOR ADMISSION NO. 57:**

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 representative has yet been approved by the court.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 58:**

18 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.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 59:**

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.

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concerning class members and the court has not yet completed its class certification process. No class		
representative has yet been approved by the court.		
ATED: June 26, 2007	LEMIEUX & O'NEILL	
	/s/	
	By: W. KEITH LEMIEUX	
	Attorneys for LITTLEROCK CREEK IRRIGATION DISTRICT and PALM RANCH IRRIGATION DISTRI	
	- 12 -	

	PROOF OF SERVICE		
2	STATE OF CALIFORNIA,)		
) ss. 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 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 <u>http://www.scefiling.org</u>		
8	dedicated link to the Antelope Valley Groundwater Cases:		
9			
0	PALM RANCH IRRIGATION DISTRICT'S RESPONSE TO DIAMOND FARMING COMPANY'S FIRST SET OF REQUEST FOR ADMISSIONS		
1	COMPANY STREET OF REQUEST FOR ADMISSIONS		
2	I declare under penalty of perjury under the laws of the State of California that the above is true and correct.		
4	Executed on June 26, 2007, in Westlake Village, California.		
5			
6	/s/		
7	KATHI MIERS		
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