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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**

10  
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 )

**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 REQUEST FOR**  
) **PRODUCTION OF DOCUMENTS**

1 **PROPOUNDING PARTY: Diamond Farming Company**

2 **RESPONDING PARTY: Palm Ranch Irrigation District**

3 **SET NUMBER: One (Nos. 1 – 6)**

4  
5 Pursuant to *Code of Civil Procedure section 2031.010*, Palm Ranch Irrigation District hereby  
6 responds to Diamond Farming Company’s First Set of Request for Production of Documents, as follows:

7 **I. PRELIMINARY STATEMENT**

8 The following responses are based on discovery and investigation to date, and do not preclude  
9 Palm Ranch from any further discovery, investigation, legal research and analysis respecting any subject  
10 matter covered by the Demand. These responses, and the production of documents hereunder, if any, are  
11 based upon information presently known to Palm Ranch after a reasonable investigation. Further  
12 investigation or discovery may reveal additional documents not produced hereunder and presently  
13 unavailable. Accordingly, these responses are provided without prejudice to the rights of Palm Ranch to  
14 produce additional evidence hereafter obtained as a result of such investigation or discovery.

15 **II. OBJECTIONS**

16 A. A production of any documents in response to any or all of the specifically demanded  
17 categories shall not be deemed to be a waiver of any rights of Palm Ranch to object to further production  
18 of such documents.

19 B. Palm Ranch objects to the Demand to the extent it calls for documents containing  
20 confidential or proprietary information or information protected by the right of privacy, and Palm Ranch  
21 will not produce such information, unless and until, in the first instance, an acceptable protective order is  
22 stipulated to among the parties.

23 C. Palm Ranch objects to any of the individual demands that call for the production of  
24 attorney work product or attorney-client privileged material, or material protected from discovery by any  
25 other applicable privilege or immunity, and refuse to produce such material. In the event that any such  
26 documents are inadvertently produced, Palm Ranch does not waive any attendant privilege, and reserves  
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1 the right to the return of all such documents and copies thereof upon request.

2 D. Palm Ranch objects to the Demand to the extent it calls for documents that are more  
3 properly sought from parties or persons other than Palm Ranch, or concerns documents generated by  
4 parties or persons other than Palm Ranch, on the ground the discovery sought is unreasonably cumulative  
5 or duplicative and is obtainable from some other source that is more convenient, less burdensome and less  
6 expensive.

7 E. Palm Ranch objects generally to producing multiple, identical copies of identified  
8 documents, and will not produce such multiple copies in response to the Demand.

9 F. No response to any portion of the Demand shall be deemed to be a waiver of any objection  
10 not set forth which could be made to any portion of the Demand concerning the relevancy of a document  
11 or the information set forth in a document, or any other matter involving admissibility of such  
12 information or document at the trial of this action.

13 G. Upon review of all potentially relevant or responsive documents, Palm Ranch reserves the  
14 right to augment these general objections and the specific responses and specific objections that follow.  
15 Subject to and without waiving these general objections, which are hereby incorporated into all of the  
16 specific responses that follow, and without waiving their right to augment the general objections, specific  
17 responses and/or specific objections, and subject to any and all specific objections that follows, Palm  
18 Ranch responds as follows:

19  
20 **RESPONSES TO DEMAND FOR PRODUCTION**

21 **RESPONSE TO REQUEST NO. 1:**

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 REQUEST NO. 2:**

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 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 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 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.

**RESPONSE TO REQUEST NO. 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 representative has yet been approved by the court.

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,  
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 REQUEST FOR PRODUCTION OF DOCUMENTS**

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