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8 Attorneys for
9 LITTLEROCK CREEK IRRIGATION DISTRICT, PALM RANCH IRRIGATION DISTRICT,
10 NORTH EDWARDS WATER DISTRICT, DESERT LAKE COMMUNITY SERVICES DISTRICT,
11 LLANO DEL RIO WATER CO., LLANO MUTUAL WATER CO., BIG ROCK MUTUAL WATER
12 CO.

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

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

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

17 ANTELOPE VALLEY GROUNDWATER
18 CASES

19 Included Actions:

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

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

26 Wm. Bolthouse Farms, Inc. v. City of Lancaster
27 Diamond Farming Co. v. City of Lancaster v.
28 Palmdale Water District, Riverside County
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. 12

) **OBJECTIONS TO NOTICES OF**
) **DEPOSITIONS OF PALM RANCH**
) **IRRIGATION DISTRICT AND**
) **LITTLEROCK CREEK IRRIGATION**
) **DISTRICT PERSONS MOST**
) **KNOWLEDGEABLE**

1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 Littlerock Creek Irrigation District, Palm Ranch Irrigation District make the following objections
3 to the notice of deposition and amended notices of deposition posted by AVEK noticing Littlerock Creek
4 Irr. District's and Palm Ranch Irrigation District's persons most knowledgeable (collectively "Objecting
5 Parties" or "Districts"):

6 1. Deposition Notice fails to properly "describe with reasonable particularity the matters on
7 which examination is requested" in accordance with Section 2025.230 of the Code of Civil Procedure.
8 Additionally, most of the requests are improperly stated in the form of a question.

9 2. The requested testimony and documents seek to invade the attorney-client privilege,
10 deliberative process privilege, and/or attorney work product doctrine.

11 3. Regarding item number 1 of the requested testimony and documents, the Districts object
12 on the ground that the solicitation of testimony and production of documents, at any deposition or
13 otherwise, "relating" to the question identified in item 1 to the extent that such testimony and/or document
14 is protect from disclosure under the attorney-client privilege, deliberative process privilege, and/or
15 attorney work product doctrine.

16 4. Regarding item number 2 of the requested testimony and documents, the Districts object
17 on the ground that the solicitation of testimony and production of documents, at any deposition or
18 otherwise, "relating" to the question identified in item 2 to the extent that such testimony and/or document
19 is protect from disclosure under the attorney-client privilege, deliberative process privilege, and/or
20 attorney work product doctrine.

21 5. Regarding item number 3 of the requested testimony and documents, the Districts object
22 on the ground that the solicitation of testimony and production of documents, at any deposition or
23 otherwise, "relating" to the question identified in item 3 to the extent that such testimony and/or document
24 is protect from disclosure under the attorney-client privilege, deliberative process privilege, and/or
25 attorney work product doctrine.

26 6. Regarding item number 4 of the requested testimony and documents, the Districts object
27 on the ground that the solicitation of testimony and production of documents, at any deposition or

1 otherwise, "relating" to the question identified in item 4 to the extent that such testimony and/or document
2 is protect from disclosure under the attorney-client privilege, deliberative process privilege, and/or
3 attorney work product doctrine.

4 7. Regarding item number 5 of the requested testimony and documents, the Districts object
5 on the ground that the solicitation of testimony and production of documents, at any deposition or
6 otherwise, "relating" to the question identified in item 5 to the extent that such testimony and/or document
7 is protect from disclosure under the attorney-client privilege, deliberative process privilege, and/or
8 attorney work product doctrine. Objecting Parties also object to item number 5 in that it requires the
9 adoption of an assumption that the origin of each molecule of water can be identified and calls for legal
10 conclusion and/or expert witness opinion as to which water molecule was pumped by Objecting Parties.

11 8. Regarding item number 6 of the requested testimony and documents, the Districts object
12 on the ground that the solicitation of testimony and production of documents, at any deposition or
13 otherwise, "relating" to the question identified in item 6 to the extent that such testimony and/or document
14 is protect from disclosure under the attorney-client privilege, deliberative process privilege, and/or
15 attorney work product doctrine.

16 9. Regarding item number 7 of the requested testimony and documents, the Districts object
17 on the ground that the solicitation of testimony and production of documents, at any deposition or
18 otherwise, "relating" to the question identified in item 7 to the extent that such testimony and/or document
19 is protect from disclosure under the attorney-client privilege, deliberative process privilege, and/or
20 attorney work product doctrine.

21 10. Regarding item number 8 of the requested testimony and documents, the Districts object
22 on the ground that the solicitation of testimony and production of documents, at any deposition or
23 otherwise, "relating" to the question identified in item 8 to the extent that such testimony and/or document
24 is protect from disclosure under the attorney-client privilege, deliberative process privilege, and/or
25 attorney work product doctrine.

26 11. Regarding item number 9 of the requested testimony and documents, the Districts object
27 on the ground that the solicitation of testimony and production of documents, at any deposition or

1 otherwise, “relating” to the question identified in item 9 to the extent that such testimony and/or document
2 is protect from disclosure under the attorney-client privilege, deliberative process privilege, and/or
3 attorney work product doctrine. Objecting Parties also object to item no. 9 in that it seek a legal
4 conclusion to whether AVEK’s claimed right has been “assigned” or “transferred”.

5 12. Regarding item number 10 of the requested testimony and documents, the Districts object
6 on the ground that the solicitation of testimony and production of documents, at any deposition or
7 otherwise, “relating” to the question identified in item 10 to the extent that such testimony and/or
8 document is protect from disclosure under the attorney-client privilege, deliberative process privilege,
9 and/or attorney work product doctrine. Objecting Parties also object to item no. 10 in that it seeks a legal
10 conclusion to whether AVEK’s claimed right has been “abandoned” or “relinquished.” Objecting Parties
11 further object to the request for document on the ground that the terms “relinquished” and “claimed” are
12 undefined, vague and ambiguous as used, and render the question unintelligible such that the District
13 cannot determine what items the noticing party seeks through this request.

14 13. Regarding item number 11 of the requested testimony and documents, the Districts object
15 on the ground that the solicitation of testimony and production of documents, at any deposition or
16 otherwise, “relating” to the question identified in item number 11 to the extent that such testimony and/or
17 document is protect from disclosure under the attorney-client privilege, deliberative process privilege,
18 and/or attorney work product doctrine. Objecting Parties also object to the request for document on the
19 ground that the term “foreign” is undefined, vague and ambiguous as used as used, and renders the
20 question unintelligible such that the District cannot determine what items the noticing party seeks through
21 this request.

22 14. Regarding item number 12 of the requested testimony and documents, the Districts object
23 on the ground that the solicitation of testimony and production of documents, at any deposition or
24 otherwise, “relating” to the question identified in item 12 to the extent that such testimony and/or
25 document is protect from disclosure under the attorney-client privilege, deliberative process privilege,
26 and/or attorney work product doctrine. Objecting Parties further object to the request for document on the
27 ground that the term “foreign” is undefined, vague and ambiguous as used, and renders the question

1 unintelligible such that the District cannot determine what items the noticing party seeks through this
2 request.

3 15. Regarding item number 13 of the requested testimony and documents, the Districts object
4 on the ground that the solicitation of testimony and production of documents, at any deposition or
5 otherwise, “relating” to the question identified in item 13 to the extent that such testimony and/or
6 document is protect from disclosure under the attorney-client privilege, deliberative process privilege,
7 and/or attorney work product doctrine. Objecting Parties further object to the request for document on the
8 ground that the terms “you”, “capital funds” and “foreign” are undefined, vague and ambiguous as used,
9 and render the question unintelligible such that the District cannot determine what items the noticing party
10 seeks through this request.

11 16. Regarding item number 14 of the requested testimony and documents, the Districts object
12 on the ground that the solicitation of testimony and production of documents, at any deposition or
13 otherwise, “relating” to the question identified in item number 14 to the extent that such testimony and/or
14 document is protect from disclosure under the attorney-client privilege, deliberative process privilege,
15 and/or attorney work product doctrine. Objecting Parties further object to the request for document on the
16 ground that the term “you” is undefined, vague and ambiguous as used, and renders the question
17 unintelligible such that the District cannot determine what items the noticing party seeks through this
18 request.

19 17. Regarding item number 15 of the requested testimony and documents, the Districts object
20 on the ground that the solicitation of testimony and production of documents, at any deposition or
21 otherwise, “relating” to the question identified in item number 15 to the extent that such testimony and/or
22 document is protect from disclosure under the attorney-client privilege, deliberative process privilege,
23 and/or attorney work product doctrine. Objecting Parties further object to the request for document on the
24 ground that the terms “access” and “you” are undefined, vague and ambiguous as used, and render the
25 question unintelligible such that the District cannot determine what items the noticing party seeks through
26 this request.

1 18. Regarding item number 16 of the requested testimony and documents, the Districts object
2 on the ground that the solicitation of testimony and production of documents, at any deposition or
3 otherwise, “relating” to the question identified in item number 16 to the extent that such testimony and/or
4 document is protect from disclosure under the attorney-client privilege, deliberative process privilege,
5 and/or attorney work product doctrine. Objecting Parties further object to the request for document on the
6 ground that the terms “exported”, “your” and “you” are undefined, vague and ambiguous as used, and
7 render the question unintelligible such that the District cannot determine what items the noticing party
8 seeks through this request.

9 19. Regarding item number 17 of the requested testimony and documents, the Districts object
10 on the ground that the solicitation of testimony and production of documents, at any deposition or
11 otherwise, “relating” to the question identified in item number 17 to the extent that such testimony and/or
12 document is protect from disclosure under the attorney-client privilege, deliberative process privilege,
13 and/or attorney work product doctrine. Objecting Parties further object to the request for document on the
14 ground that the terms “exported”, “your” and “you” are undefined, vague and ambiguous as used, and
15 render the question unintelligible such that the District cannot determine what items the noticing party
16 seeks through this request.

17 20. Regarding item number 18 of the requested testimony and documents, the Districts object
18 on the ground that the solicitation of testimony and production of documents, at any deposition or
19 otherwise, “relating” to the question identified in item 18 to the extent that such testimony and/or
20 document is protect from disclosure under the attorney-client privilege, deliberative process privilege,
21 and/or attorney work product doctrine. Objecting Parties further object to the request for document on the
22 ground that the terms “exported”, “your” and “you” are undefined, vague and ambiguous as used, and
23 render the question unintelligible such that the District cannot determine what items the noticing party
24 seeks through this request.

25 21. Regarding item number 19 of the requested testimony and documents, the Districts object
26 on the ground that the solicitation of testimony and production of documents, at any deposition or
27 otherwise, “relating” to the question identified in item number 19 to the extent that such testimony and/or

1 document is protect from disclosure under the attorney-client privilege, deliberative process privilege,
2 and/or attorney work product doctrine. Objecting Parties further objects to the request for document on
3 the ground that the terms “exported”, “your” and “you” are undefined, vague and ambiguous as used, and
4 render the question unintelligible such that the District cannot determine what items the noticing party
5 seeks through this request.

6 22. Regarding item number 20 of the requested testimony and documents, the Districts object
7 on the ground that the solicitation of testimony and production of documents, at any deposition or
8 otherwise, “relating” to the question identified in item 20 to the extent that such testimony and/or
9 document is protect from disclosure under the attorney-client privilege, deliberative process privilege,
10 and/or attorney work product doctrine. Objecting Parties further object to the request for document on the
11 ground that the term “you” is undefined, vague and ambiguous as used, and renders the question
12 unintelligible such that the District cannot determine what items the noticing party seeks through this
13 request. Objecting Parties further object to this request for document on the grounds that it is
14 burdensome, oppressive, and not calculated to lead to the discovery of admissible evidence.

15 23. Regarding item number 21 of the requested testimony and documents, the Districts object
16 on the ground that the solicitation of testimony and production of documents, at any deposition or
17 otherwise, “relating” to the question identified in item number 21 to the extent that such testimony and/or
18 document is protect from disclosure under the attorney-client privilege, deliberative process privilege,
19 and/or attorney work product doctrine. Objecting Parties further object to the request for document on the
20 ground that the term “you” is undefined, vague and ambiguous as used, and renders the question
21 unintelligible such that the District cannot determine what items the noticing party seeks through this
22 request. Objecting Parties further object to this request for document on the grounds that it is
23 burdensome, oppressive, and not calculated to lead to the discovery of admissible evidence.

1 DATED: Dec. 16, 2013

LEMIEUX & O'NEILL

2
3 By:  _____

4 W. Keith Lemieux

5 Christine Carson ✓

6 Attorneys for Littlerock Creek Irrigation District, Palm Ranch
7 Irrigation District, North Edwards Water District And Desert Lake
8 Community Services District
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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 4165 E. Thousand Oaks Blvd., Suite 350, Westlake
7 Village, California 91362.

8 On **December 16, 2013**, I posted the following document(s) to the website
9 <http://www.scefiling.org>, a dedicated link to the Antelope Valley Groundwater Cases, and upon which the
10 parties have agreed this posting constitutes service.

11 **OBJECTIONS TO NOTICES OF DEPOSITIONS OF PALM RANCH IRRIGATION DISTRICT
12 AND LITTLEROCK CREEK IRRIGATION DISTRICT PERSONS MOST
13 KNOWLEDGEABLE**

14 By electronically serving through <http://www.scefiling.org>, and addressed to all parties appearing
15 on the <http://www.scefiling.org> electronic service list, the file transmission was reported as complete and
16 a copy of the <http://www.scefiling.org> Filing/Service Receipt will be maintained with a copy of the
17 document in our office.

18 I am readily familiar with the business practice for collection and processing of pleadings and
19 discovery for electronic service with <http://www.scefiling.org>, and that the pleadings and discovery shall
20 be electronically served this same day in the ordinary course of business.

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

23 Executed on December 16, 2013, in Westlake Village, California.

24 
Kathi Miers