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ROSAMOND COMMUNITY SERVICES
12 DISTRICT and LOS ANGELES COUNTY
WATERWORKS DISTRICT NO. 40
13

SUPERIOR COURT OF THE STATE OF CALIFORNIA
14 COUNTY OF LOS ANGELES – CENTRAL DISTRICT
15

16 **ANTELOPE VALLEY**
17 **GROUNDWATER CASES**
18 Included Actions:
19 Los Angeles County Waterworks District
No. 40 v. Diamond Farming Co., Superior
20 Court of California, County of Los
Angeles, Case No. BC 325201;
21 Los Angeles County Waterworks District
No. 40 v. Diamond Farming Co., Superior
22 Court of California, County of Kern, Case
No. S-1500-CV-254-348;
23 Wm. Bolthouse Farms, Inc. v. City of
24 Lancaster, Diamond Farming Co. v. City of
Lancaster, Diamond Farming Co. v.
25 Palmdale Water Dist., Superior Court of
California, County of Riverside, Case Nos.
26 RIC 353 840, RIC 344 436, RIC 344 668

Judicial Council Coordination No. 4408
Santa Clara Case No. 1-05-CV-049053
Assigned to The Honorable Jack Komar

**LOS ANGELES COUNTY
WATERWORKS DISTRICT NO. 40'S
RESPONSE TO REQUEST FOR
PRODUCTION OF DOCUMENTS, SET
ONE**

1 PROPOUNDING PARTY: Defendant, Bolthouse Properties, LLC
2 RESPONDING PARTY: Plaintiff, Los Angeles County Waterworks District No. 40
3 SET NUMBER: One (1)
4

5 Plaintiff Los Angeles County Waterworks District No. 40 (“Responding Party”) hereby
6 responds to the Request for Production of Documents Set One propounded by Defendant
7 Bolthouse Properties, LLC (“Propounding Party”) as follows:
8

9 **PRELIMINARY STATEMENT**

10
11 Responding Party is in the process of conducting its investigation and discovery in this
12 action. Consequently, Responding Party responds to these Demands to the best of its knowledge,
13 but in doing so, reserves the right to amend its response at a future date. Responding Party
14 further reserves the right to offer, at time of trial, facts, testimony or other evidence discovered
15 subsequent to and not included in this response, and assumes no obligation to voluntarily
16 supplement or amend this response to reflect such facts, testimony or other evidence.
17

18 **GENERAL OBJECTIONS**

19
20 By responding to Propounding Party’s Demand for Inspection and Production of
21 Documents, Set One, Responding Party does not concede the relevancy or materiality of any
22 request, or of the subject to which such request refers.
23

24 Each response is made subject to all objections as to competence, relevance, materiality,
25 propriety, and admissibility, as well as any or all other objections and grounds which would
26 require exclusion of evidence. Responding Party reserves the right to make any and all such
27 objections at trial and at any other proceeding relating to this action.
28

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1 environmental reports, CEQA documents etc. A copy of the referenced Area of Adjudication is
2 attached for convenient reference.

3
4 The above-described documents and things are believed to be in the possession,
5 custody or control of responding party, responding party's attorneys or their investigators, are
6 calculated to lead to admissible and relevant evidence and are not privileged.

7
8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 1:**

9
10 Responding Party incorporates herein the general objections set forth above. Responding
11 Party objects to this Request to the extent it is compound. Responding party further objects to the
12 definition of "Antelope Valley Area of Adjudication" as vague, ambiguous, and irrelevant as the
13 Court has now established the adjudication area. Responding party further objects that the
14 request is unreasonably overbroad and burdensome.

15 Dated: December 4, 2006

BEST BEST & KRIEGER LLP

16
17
18 By Stefanie Hedlund
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STEFANIE D. HEDLUND
Attorneys for Cross-Complainants
ROSAMOND COMMUNITY SERVICES
DISTRICT and LOS ANGELES
COUNTY WATERWORKS DISTRICT
NO. 40

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PROOF OF SERVICE

I, Kerry V. Keefe, declare:

I am a resident of the State of California and over the age of eighteen years, and not a party to the within action; my business address is Best Best & Krieger LLP, 5 Park Plaza, Suite 1500, Irvine, California 92614. On December 4, 2006, I served the within document(s):

LOS ANGELES COUNTY WATERWORKS DISTRICT NO. 40'S RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS, SET ONE

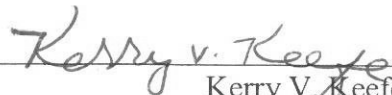
- by posting the document(s) listed above to the Santa Clara County Superior Court website in regard to the Antelope Valley Groundwater matter.
- by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Irvine, California addressed as set forth below.
- by causing personal delivery by ASAP Corporate Services of the document(s) listed above to the person(s) at the address(es) set forth below.
- by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.
- I caused such envelope to be delivered via overnight delivery addressed as indicated on the attached service list. Such envelope was deposited for delivery by Federal Express following the firm's ordinary business practices.

(SEE ATTACHED SERVICE LIST)

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

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

Executed on December 4, 2006, at Irvine, California.



Kerry V. Keefe

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