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WATERWORKS DISTRICT NO. 40

**EXEMPT FROM FILING FEES
UNDER GOVERNMENT CODE
SECTION 6103**

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13 COUNTY WATERWORKS DISTRICT NO. 40

14
15 SUPERIOR COURT OF THE STATE OF CALIFORNIA
16 COUNTY OF LOS ANGELES – CENTRAL DISTRICT
17

18 **ANTELOPE VALLEY**
19 **GROUNDWATER CASES**

Included Actions:
20 Los Angeles County Waterworks District
No. 40 v. Diamond Farming Co., Superior
21 Court of California, County of Los
Angeles, Case No. BC 325201;

22 Los Angeles County Waterworks District
23 No. 40 v. Diamond Farming Co., Superior
Court of California, County of Kern, Case
24 No. S-1500-CV-254-348;

25 Wm. Bolthouse Farms, Inc. v. City of
Lancaster, Diamond Farming Co. v. City of
26 Lancaster, Diamond Farming Co. v.
Palmdale Water Dist., Superior Court of
27 California, County of Riverside, Case Nos.
RIC 353 840, RIC 344 436, RIC 344 668
28

Judicial Council Coordination No. 4408

CLASS ACTION

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

**LOS ANGELES COUNTY
WATERWORKS DISTRICT NO. 40'S
RESPONSES TO SPECIAL
INTERROGATORIES, SET ONE**

1 PROPOUNDING PARTY: Diamond Farming Company
2 RESPONDING PARTY: Los Angeles County Waterworks District No. 40
3 SET NUMBER: One (1)
4

5 RESPONSE TO SPECIAL INTERROGATORY NO. 1:

6 Objection. The request is premature, burdensome and oppressive. This request seeks
7 information concerning class members and the court has not yet completed its class certification
8 process. No class representative has yet been approved by the court.
9

10 RESPONSE TO SPECIAL INTERROGATORY NO. 2:

11 Objection. The request is premature, burdensome and oppressive. This request seeks
12 information concerning class members and the court has not yet completed its class certification
13 process. No class representative has yet been approved by the court.
14

15 RESPONSE TO SPECIAL INTERROGATORY NO. 3:

16 Objection. The request is premature, burdensome and oppressive. This request seeks
17 information concerning class members and the court has not yet completed its class certification
18 process. No class representative has yet been approved by the court.
19

20 RESPONSE TO SPECIAL INTERROGATORY NO. 4:

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

25 RESPONSE TO SPECIAL INTERROGATORY NO. 5:

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

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RESPONSE TO SPECIAL INTERROGATORY 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.

RESPONSE TO SPECIAL INTERROGATORY NO. 7:

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 SPECIAL INTERROGATORY 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 SPECIAL INTERROGATORY NO. 9:

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

BEST BEST & KRIEGER LLP

By 
ERIC L. GARNER
JEFFREY V. DUNN
STEFANIE D. HEDLUND
Attorneys for Cross-Complainants
ROSAMOND COMMUNITY SERVICES
DISTRICT and LOS ANGELES
COUNTY WATERWORKS DISTRICT
NO. 40

ORANGE\37294.1

1 **PROOF OF SERVICE**

2 I, Kerry V. Keefe, declare:

3 I am a resident of the State of California and over the age of eighteen years, and
4 not a party to the within action; my business address is Best Best & Krieger LLP, 5 Park Plaza,
Suite 1500, Irvine, California 92614. On June 26, 2007, I served the within document(s):

5 **LOS ANGELES COUNTY WATERWORKS DISTRICT NO. 40'S RESPONSES TO**
6 **SPECIAL INTERROGATORIES, SET ONE**

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

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

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

25 Executed on June 26, 2007, at Irvine, California.

26 
27 _____
28 Kerry V. Keefe

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