

1 BEST BEST & KRIEGER LLP  
ERIC L. GARNER, Bar No. 130665  
2 JEFFREY V. DUNN, Bar No. 131926  
STEFANIE D. HEDLUND, Bar No. 239787  
3 5 PARK PLAZA, SUITE 1500  
IRVINE, CALIFORNIA 92614  
4 TELEPHONE: (949) 263-2600  
TELECOPIER: (949) 260-0972  
5 Attorneys for Cross-Complainants  
ROSAMOND COMMUNITY SERVICES  
6 DISTRICT and LOS ANGELES COUNTY  
WATERWORKS DISTRICT NO. 40

EXEMPT FROM FILING FEES  
UNDER GOVERNMENT CODE  
SECTION 6103

7 OFFICE OF COUNTY COUNSEL  
8 COUNTY OF LOS ANGELES  
RAYMOND G. FORTNER, JR., Bar No. 42230  
9 COUNTY COUNSEL  
FREDERICK W. PFAEFFLE, Bar No. 145742  
10 PRINCIPAL DEPUTY COUNTY COUNSEL  
500 WEST TEMPLE STREET  
11 LOS ANGELES, CALIFORNIA 90012  
TELEPHONE: (213) 974-1901  
12 TELECOPIER: (213) 458-4020  
Attorneys for Cross-Complainant LOS ANGELES  
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**

20 Included Actions:  
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  
No. 40 v. Diamond Farming Co., Superior  
23 Court of California, County of Kern, Case  
No. S-1500-CV-254-348;

24 Wm. Bolthouse Farms, Inc. v. City of  
25 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**  
**OBJECTIONS TO REQUESTS FOR**  
**ADMISSIONS, SET ONE**

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

4 OBJECTION TO REQUEST NO. 1:

5 Objection. This request is not reasonably calculated to lead to the discovery of admissible  
6 evidence. The request is manifestly irrelevant and calculated to harass.

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8 OBJECTION TO REQUEST NO. 2:

9 Los Angeles County Waterworks District No. 40 admits that it is a public entity.

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11 OBJECTION TO REQUEST NO. 3:

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

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16 OBJECTION TO REQUEST NO. 4:

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

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21 OBJECTION TO REQUEST NO. 5:

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

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26 OBJECTION TO REQUEST NO. 6:

27 Objection. The request is premature, burdensome and oppressive. This request seeks  
28

1 information concerning class members and the court has not yet completed its class certification  
2 process. No class representative has yet been approved by the court.

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4 OBJECTION TO REQUEST NO. 7:

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

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9 OBJECTION TO REQUEST NO. 8:

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

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14 OBJECTION TO REQUEST NO. 9:

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

18  
19 OBJECTION TO REQUEST NO. 10:

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

23  
24 OBJECTION TO REQUEST NO. 11:

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

1 OBJECTION TO REQUEST NO. 12:

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

5  
6 OBJECTION TO REQUEST NO. 13:

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

10  
11 OBJECTION TO REQUEST NO. 14:

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

15  
16 OBJECTION TO REQUEST NO. 15:

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

20  
21 OBJECTION TO REQUEST NO. 16:

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

25  
26 OBJECTION TO REQUEST NO. 17:

27           Objection. The request is premature, burdensome and oppressive. This request seeks  
28 information concerning class members and the court has not yet completed its class certification

1 process. No class representative has yet been approved by the court.

2

3 OBJECTION TO REQUEST NO. 18:

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

7

8 OBJECTION TO REQUEST NO. 19:

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

12

13 OBJECTION TO REQUEST NO. 20:

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

17

18 OBJECTION TO REQUEST NO. 21:

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

22

23 OBJECTION TO REQUEST NO. 22:

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

27

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1 OBJECTION TO REQUEST NO. 23:

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

5  
6 OBJECTION TO REQUEST NO. 24:

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

10  
11 OBJECTION TO REQUEST NO. 25:

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

15  
16 OBJECTION TO REQUEST NO. 26:

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

20  
21 OBJECTION TO REQUEST NO. 27:

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

25  
26 OBJECTION TO REQUEST NO. 28:

27           Objection. The request is premature, burdensome and oppressive. This request seeks  
28 information concerning class members and the court has not yet completed its class certification

1 process. No class representative has yet been approved by the court.

2

3 OBJECTION TO REQUEST NO. 29:

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

7

8 OBJECTION TO REQUEST NO. 30:

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

12

13 OBJECTION TO REQUEST NO. 31:

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

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18 OBJECTION TO REQUEST NO. 32:

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

22

23 OBJECTION TO REQUEST NO. 33:

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

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1 OBJECTION TO REQUEST NO. 34:

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

6 OBJECTION TO REQUEST NO. 35:

7           Objection. The request is premature, burdensome and oppressive. This request seeks  
8 information concerning class members and the court has not yet completed its class certification  
9 process. No class representative has yet been approved by the court.  
10

11 OBJECTION TO REQUEST NO. 36:

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

16 OBJECTION TO REQUEST NO. 37:

17           Objection. The request is premature, burdensome and oppressive. This request seeks  
18 information concerning class members and the court has not yet completed its class certification  
19 process. No class representative has yet been approved by the court.  
20

21 OBJECTION TO REQUEST NO. 38:

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

26 OBJECTION TO REQUEST NO. 39:

27           Objection. The request is premature, burdensome and oppressive. This request seeks  
28 information concerning class members and the court has not yet completed its class certification



1 process. No class representative has yet been approved by the court.

2

3 OBJECTION TO REQUEST NO. 40:

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

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8 OBJECTION TO REQUEST NO. 41:

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

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13 OBJECTION TO REQUEST NO. 42:

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

17

18 OBJECTION TO REQUEST NO. 43:

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

22

23 OBJECTION TO REQUEST NO. 44:

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

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1 OBJECTION TO REQUEST NO. 45:

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

5  
6 OBJECTION TO REQUEST NO. 46:

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

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11 OBJECTION TO REQUEST NO. 47:

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

15  
16 OBJECTION TO REQUEST NO. 48:

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

20  
21 OBJECTION TO REQUEST NO. 49:

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

25  
26 OBJECTION TO REQUEST NO. 50:

27           Objection. The request is premature, burdensome and oppressive. This request seeks  
28 information concerning class members and the court has not yet completed its class certification

1 process. No class representative has yet been approved by the court.  
2

3 OBJECTION TO REQUEST NO. 51:

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

8 OBJECTION TO REQUEST NO. 52:

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

13 OBJECTION TO REQUEST NO. 53:

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

18 OBJECTION TO REQUEST NO. 54:

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

23 OBJECTION TO REQUEST NO. 55:

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

1 OBJECTION TO REQUEST NO. 56:

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

5  
6 OBJECTION TO REQUEST NO. 57:

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

10  
11 OBJECTION TO REQUEST NO. 58:

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

15  
16 OBJECTION TO REQUEST NO. 59:

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

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LAW OFFICES OF  
BEST BEST & KRIEGER LLP  
5 PARK PLAZA, SUITE 1500  
IRVINE, CALIFORNIA 92614

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OBJECTION TO REQUEST NO. 60:

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\37295.1

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):

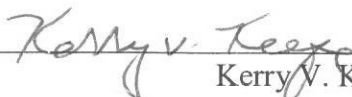
5 **LOS ANGELES COUNTY WATERWORKS DISTRICT NO. 40'S OBJECTIONS TO**  
6 **REQUESTS FOR ADMISSIONS, SET ONE**

- 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

LAW OFFICES OF  
BESTBEST & KRIEGER LLP  
5 PARK PLAZA, SUITE 1500  
IRVINE, CALIFORNIA 92614