

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**
GROUNDWATER CASES
19
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
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

**ROSAMOND COMMUNITY SERVICES
DISTRICT'S OBJECTIONS TO
REQUESTS FOR ADMISSIONS, SET ONE**

1 PROPOUNDING PARTY: Diamond Farming Company

2 RESPONDING PARTY: Rosamond Community Services District

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.

8 OBJECTION TO REQUEST NO. 2:

9 Rosamond Community Services District admits that it is a public entity.

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.

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.

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.

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.

3
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.

8
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.

13
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.

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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.

17

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.

7
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.

12
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.

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.

10
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.

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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.

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.

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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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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\37317.1

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 **ROSAMOND COMMUNITY SERVICES DISTRICT'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
BEST BEST & KRIEGER LLP
5 PARK PLAZA, SUITE 1500
IRVINE, CALIFORNIA 92614