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WATERWORKS DISTRICT NO. 40  
7

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

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

18 **ANTELOPE VALLEY  
GROUNDWATER CASES**

19 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  
OBJECTIONS TO REQUEST FOR  
PRODUCTION OF DOCUMENTS, 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 OBJECTION TO REQUEST 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 OBJECTION TO REQUEST 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 OBJECTION TO REQUEST 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 OBJECTION TO REQUEST 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 OBJECTION TO REQUEST 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

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

OBJECTION TO REQUEST 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.

Dated: June 26, 2007

BEST BEST & KRIEGER LLP

By   
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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 June 26, 2007, I served the within document(s):

**LOS ANGELES COUNTY WATERWORKS DISTRICT NO. 40'S OBJECTIONS 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.

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 June 26, 2007, at Irvine, California.

  
Kerry V. Keefe