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6 DISTRICT NO. 40

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

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COUNTY WATERWORKS DISTRICT NO. 40

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

17 **ANTELOPE VALLEY**
18 **GROUNDWATER CASES**

19 Included Actions:
20 Los Angeles County Waterworks District
No. 40 v. Diamond Farming Co., Superior
Court of California, County of Los
21 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
Lancaster, Diamond Farming Co. v.
26 Palmdale Water Dist., Superior Court of
California, County of Riverside, Case Nos.
27 RIC 353 840, RIC 344 436, RIC 344 668

Judicial Council Coordination No. 4408

CLASS ACTION

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

OBJECTION TO NOTICE OF DEPOSITION
OF ADAM ARIKI AND REQUEST FOR
PRODUCTION OF DOCUMENTS AT THE
DEPOSITION

Date: April 12, 2013
Time: 9:00 a.m.

1 TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

2 Los Angeles County Waterworks District No. 40 (“County”) hereby objects to the notice
3 of deposition of Adam Ariki and the requests for production of documents at the deposition. The
4 County objects to the notice and to the requests for production in their entirety on the ground that
5 Plaintiffs did not provide sufficient notice pursuant Code of Civil Procedure section 2025.270.
6 The County further objects to the notice to the extent that the identified topics of testimony are
7 vague and ambiguous, overly broad or unduly burdensome, or not relevant nor reasonably
8 calculated to lead to the discovery of admissible evidence. The County further objects to the
9 extent the requested testimony or documents seek to invade the attorney-client privilege and/or
10 attorney work product doctrine. Without waiving the stated objections, Mr. Ariki will appear for
11 deposition.

12 The County further objects to each document request as follows.

13 1. The County objects to Request for Production No. 1 on the ground that it is vague
14 and ambiguous. Without waiving any of the stated objections, the County will produce a
15 responsive document.

16 2. The County objects to Request for Production No. 2 on the ground that it seeks
17 documents protected by the attorney work product doctrine. The County further objects to the
18 request on the ground that it is vague and ambiguous. The County will not produce responsive
19 documents.

20 3. The County will produce the witness’s most current C.V. in response to Request
21 for Production No. 3, subject to the objections set forth above.

22 4. The County objects to Request for Production No. 4 on the ground that it seeks
23 documents protected by the attorney work product doctrine. The County further objects to the
24 request on the ground that it is vague and ambiguous. The County further objects to the request
25 on the ground that it is overly broad and unduly burdensome. The County will not produce
26 responsive documents.

27 5. The County objects to Request for Production No. 5 on the ground that it seeks
28 documents that are not relevant, nor reasonably calculated to lead to the discovery of admissible

1 evidence. The County further objects to the request on the ground that it is overly broad and
2 unduly burdensome. The County will not produce responsive documents.

3 6. The County objects to Request for Production No. 6 on the ground that it seeks
4 documents protected by the attorney-client privilege and attorney work product doctrine. The
5 County further objects to the request on the ground that it is vague and ambiguous. The County
6 further objects to the request on the ground that it is overly broad and unduly burdensome. The
7 County further objects to the request on the ground that it seeks documents that are not relevant,
8 nor reasonably calculated to lead to the discovery of admissible evidence. The County will not
9 produce responsive documents.

10 7. The County objects to Request for Production No. 7 on the ground that is overly
11 broad and unduly burdensome insofar as such responsive documents have already been produced,
12 and will not be reproduced.

13 8. The County objects to Request for Production No. 8 on the ground that it seeks
14 documents that are not relevant, nor reasonably calculated to lead to the discovery of admissible
15 evidence. The County further objects to the request on the ground that it is overly broad and
16 unduly burdensome. The County will not produce responsive documents.

17 9. The County objects to Request for Production No. 9 on the ground that it seeks
18 documents protected by the attorney-client privilege and attorney work product doctrine. The
19 County further objects to the request on the ground that it seeks to invade the deliberative process
20 privilege. The County further objects to the request on the ground that it is overly broad and
21 unduly burdensome. The County will not produce responsive documents.

22 10. The County objects to Request for Production No. 10 on the ground that it seeks
23 documents that are not relevant, nor reasonably calculated to lead to the discovery of admissible
24 evidence. The County further objects to the request on the ground that it is overly broad and
25 unduly burdensome. The County will not produce responsive documents.

26 11. The County objects to Request for Production No. 11 on the ground that it seeks
27 documents that are not relevant, nor reasonably calculated to lead to the discovery of admissible
28 evidence. The County further objects to the request on the ground that it is overly broad and

1 unduly burdensome. The County will not produce responsive documents.

2 12. The County objects to Request for Production No. 12 on the ground that it seeks
3 documents protected by the attorney-client privilege and attorney work product doctrine. The
4 County further objects to the request on the ground that it is overly broad and unduly
5 burdensome. The County will not produce responsive documents.

6 13. The County objects to Request for Production No. 13 on the ground that it that it is
7 overly broad and unduly burdensome. The County further objects to the request on the ground
8 that it is vague and ambiguous. Without waiving any of the stated objections, the County will
9 produce a responsive document.

10 14. The County objects to Request for Production No. 14 on the ground that it seeks
11 documents that are not relevant, nor reasonably calculated to lead to the discovery of admissible
12 evidence. The County further objects to the request on the ground that it is overly broad and
13 unduly burdensome. The County will not produce responsive documents.

14 15. The County objects to Request for Production No. 15 on the ground that it seeks
15 documents protected by the attorney-client privilege and attorney work product doctrine. The
16 County further objects to the request on the ground that it is overly broad and unduly
17 burdensome. The County further objects to the request on the ground that it is vague and
18 ambiguous. The County will not produce responsive documents.

19 16. The County objects to Request for Production No. 16 on the ground that it that it is
20 overly broad and unduly burdensome. The County further objects to the request on the ground
21 that it is vague and ambiguous. The County will not produce responsive documents.

22 Dated: April 9, 2013

BEST BEST & KRIEGER LLP

23
24 By 

ERIC L. GARNER
JEFFREY V. DUNN
STEFANIE D. HEDLUND
Attorneys for Cross-Complainant
LOS ANGELES COUNTY
WATERWORKS DISTRICT NO. 40

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 April 9, 2013, I served the within document(s):

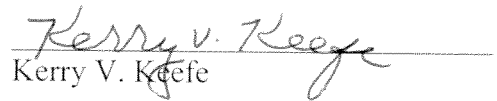
OBJECTION TO NOTICE OF DEPOSITION OF ADAM ARIKI AND REQUEST FOR PRODUCTION OF DOCUMENTS AT THE DEPOSITION

- 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 April 9, 2013, at Irvine, California.


Kerry V. Keefe