

LAW OFFICES OF
BEST BEST & KRIEGER LLP
18101 VON KARMAN AVENUE, SUITE 1000
IRVINE, CALIFORNIA 92612

1 BEST BEST & KRIEGER LLP
ERIC L. GARNER, Bar No. 130665
2 JEFFREY V. DUNN, Bar No. 131926
WENDY Y. WANG, Bar No. 228923
3 18101 VON KARMAN AVENUE, SUITE 1000
IRVINE, CALIFORNIA 92612
4 TELEPHONE: (949) 263-2600
TELECOPIER: (949) 260-0972
5 Attorneys for Cross-Complainant
LOS ANGELES COUNTY WATERWORKS
6 DISTRICT NO. 40

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

7 OFFICE OF COUNTY COUNSEL
COUNTY OF LOS ANGELES
8 JOHN F. KRATTLI, Bar No. 82149
COUNTY COUNSEL
9 WARREN WELLEN, Bar No. 139152
PRINCIPAL DEPUTY COUNTY COUNSEL
10 500 WEST TEMPLE STREET
LOS ANGELES, CALIFORNIA 90012
11 TELEPHONE: (213) 974-8407
TELECOPIER: (213) 687-7337
12 Attorneys for Cross-Complainant LOS ANGELES
COUNTY WATERWORKS DISTRICT NO. 40

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

16 ANTELOPE VALLEY GROUNDWATER
CASES
17 Included Actions:
Los Angeles County Waterworks District No.
18 40 v. Diamond Farming Co., Superior Court of
California, County of Los Angeles, Case No.
19 BC 325201;
20 Los Angeles County Waterworks District No.
40 v. Diamond Farming Co., Superior Court of
21 California, County of Kern, Case No. S-1500-
CV-254-348;
22 Wm. Bolthouse Farms, Inc. v. City of
23 Lancaster, Diamond Farming Co. v. City of
Lancaster, Diamond Farming Co. v. Palmdale
24 Water Dist., Superior Court of California,
County of Riverside, Case Nos. RIC 353 840,
25 RIC 344 436, RIC 344 668
26 RICHARD WOOD, on behalf of himself and
all other similarly situated v. A.V. Materials,
27 Inc., et al., Superior Court of California,
County of Los Angeles, Case No. BC509546
28

Judicial Council Coordination Proceeding
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
NOTICE TO ANTELOPE VALLEY EAST
KERN WATER AGENCY TO APPEAR AT
TRIAL

Trial Date: February 10, 2014 (Phase V)

Date: February 10, 2014
Time: 9:00 a.m.
Place: 111 North Hill Street,
Los Angeles, California
Dept.: Old Department "1", Room 222


LAW OFFICES OF
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IRVINE, CALIFORNIA 92612

1 TO ANTELOPE VALLEY EAST KERN WATER AGENCY (“AVEK”) and its counsel of
2 record:

3 PLEASE TAKE NOTICE THAT pursuant to Code of Civil Procedure section 1987,
4 subdivisions (b) and (c), Los Angeles County Waterworks District No. 40 (“District No. 40”)
5 requests that AVEK produce witnesses Dan Flory, Dwayne Chisam Michael Flood and Robert
6 Wagner at trial in the above-captioned matter on February 10, 2014 at 9:00 a.m. in (old)
7 Department “1” of the Los Angeles Superior Court, located at 111 North Hill Street, Los Angeles,
8 California, or such other location as may be ordered by the court, to testify as witnesses in this
9 case.

10 PLEASE TAKE FURTHER NOTICE THAT pursuant to Code of Civil Procedure section
11 1987, subdivision (c), District No. 40 requests that AVEK produce the documents described in
12 the attached **Exhibit A**, which AVEK has in their possession or under their control. AVEK is
13 requested to produce such documents at trial on February 12, 2014 at 9:00 a.m., in (old)
14 Department “1” of the Los Angeles Superior Court, located at 111 North Hill Street, Los Angeles,
15 California, or such other location as may be ordered by the court.

17 Dated: January 23, 2014

BEST BEST & KRIEGER LLP
By 
ERIC L. GARNER
JEFFREY V. DUNN
WENDY Y. WANG
Attorneys for Cross-Complainant
LOS ANGELES COUNTY WATERWORKS
DISTRICT NO. 40

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EXHIBIT A
DEFINITIONS

The following words and phrases shall govern the construction of this document unless the context otherwise requires:

1. "DOCUMENTS" means "writing" as defined by Evidence Code section 250 and includes drafts, originals and duplicates of written, graphic, computer or otherwise recorded matters, whether stored in written, electronic, magnetic or photographic format or by any other means.

2. "AVEK" shall mean ANTELOPE VALLEY EAST KERN WATER AGENCY, any of their agents, representatives, officers or employees.

DOCUMENTS TO BE PRODUCED

1. The DOCUMENTS prepared by AVEK, including sales ledgers, invoices, spreadsheets, or other similar documents, showing the quantities of water purchased from AVEK by Los Angeles County Waterworks District No. 40 and/or its predecessors ("Waterworks Districts"), including DOCUMENTS showing the dollar amounts the Waterworks Districts purchased on an annual basis.

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PROOF OF SERVICE

I, Sandra K. Sandoval, 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, 300 South Grand Avenue, 25th Floor, Los Angeles, CA 90071. On January 23, 2014, I served the within document(s):

LOS ANGELES COUNTY WATERWORKS DISTRICT NO. 40'S NOTICE TO ANTELOPE VALLEY EAST KERN WATER AGENCY TO APPEAR AT TRIAL

by posting the document(s) listed above to the Santa Clara County Superior Court website in regard to the Antelope Valley Groundwater matter.

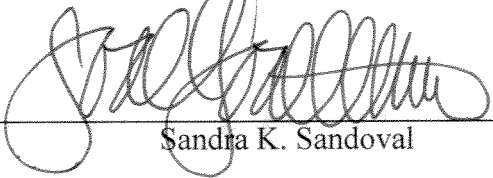
by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Irvine, California addressed as set forth below.

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 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 January 23, 2014, at Los Angeles, California.



Sandra K. Sandoval