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SECTION 6103**

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LOS ANGELES COUNTY WATERWOKKS  
12 DISTRICT NO. 40

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

16 **ANTELOPE VALLEY  
GROUNDWATER CASES**

17 Included Actions:

18 Los Angeles County Waterworks District  
No. 40 v. Diamond Farming Co., Superior  
19 Court of California, County of Los  
Angeles, Case No. BC 325201;

20 Los Angeles County Waterworks District  
No. 40 v. Diamond Farming Co., Superior  
21 Court of California, County of Kern, Case  
No. S-1500-CV-254-348;

22  
23 Wm. Bolthouse Farms, Inc. v. City of  
Lancaster, Diamond Farming Co. v. City of  
24 Lancaster, Diamond Farming Co. v.  
Palmdale Water Dist., Superior Court of  
25 California, County of Riverside, Case Nos.  
RIC 353 840, RIC 344 436, RIC 344 668  
26  
27  
28

Judicial Council Coordination No. 4408

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

**LOS ANGELES COUNTY  
WATERWORKS DISTRICT NO. 40's  
OBJECTIONS TO FORM  
INTERROGATORIES BY CAMERON  
PROPERTIES, INC.**

1 PROPOUNDING PARTY: Cross-Defendant CAMERON PROPERTIES, INC.  
2 RESPONDING PARTY: Cross-Complainant, LOS ANGELES COUNTY WATERWORKS  
3 DISTRICT NO. 40  
4 SET NUMBER: One (1)  
5

6 Cross-Complainant, LOS ANGELES COUNTY WATERWORKS DISTRICT NO. 40  
7 (the "District") hereby responds to Form Interrogatories, Set One, propounded by Cross-  
8 Defendant, CAMERON PROPERTIES, INC. ("Cameron"), as follows:  
9

10 **PRELIMINARY STATEMENT**

11 The District is in the process of conducting its investigation and discovery in this action.  
12 Consequently, the District responds to these Interrogatories to the best of its knowledge, but in  
13 doing so, reserves the right to amend its response at a future date. The District further reserves  
14 the right to offer, at time of trial, facts, testimony or other evidence discovered subsequent to and  
15 not included in this response, and assumes no obligation to voluntarily supplement or amend this  
16 response to reflect such facts, testimony or other evidence.  
17

18 **GENERAL OBJECTIONS**

19 By responding to Cameron's Interrogatories, Set One, the District does not concede the  
20 relevancy or materiality of any request, or of the subject to which such request refers.

21 Each response is made subject to all objections as to competence, relevance, materiality,  
22 propriety, and admissibility, as well as any or all other objections and grounds which would  
23 require exclusion of evidence. The District reserves the right to make any and all such objections  
24 at trial and at any other proceeding relating to this action.

25 The specific responses and objections given below are submitted without prejudice to, and  
26 without waiving, any of these general objections even though the general objections are not  
27 expressly set forth in each response.  
28



1 **RESPONSE TO INTERROGATORY NO. 2.6:**

2 The District objects to this Request because it relates to issues outside the scope of class  
3 certification. At this time the Court has limited discovery in this matter to class certification.  
4 Furthermore, the District objects to this Request because it is a public entity.

5 **INTERROGATORY NO. 3.1:**

6 Are you a corporation? If so, state:

- 7 (a) the name stated in the current articles of incorporation;  
8 (b) all other names used by the corporation during the past 10 years and the dates each  
9 was used;  
10 (c) the date and place of incorporation;  
11 (d) the **ADDRESS** of the principal place of business; and  
12 (e) whether you are qualified to do business in California.

13 **RESPONSE TO INTERROGATORY NO. 3.1:**

14 The District objects to this Request because it relates to issues outside the scope of class  
15 certification. At this time the Court has limited discovery in this matter to class certification.  
16 Furthermore, the District objects to this Request because it is a public entity.

17 **INTERROGATORY NO. 3.2:**

18 Are you a partnership? If so, state:

- 19 (a) the current partnership name;  
20 (b) all other names used by the partnership during the past 10 years and the dates each  
21 was used;  
22 (c) whether you are a limited partnership and, if so, under the laws of what  
23 jurisdiction;  
24 (d) the name and **ADDRESS** of each general partner; and  
25 (e) the **ADDRESS** of the principal place of business.

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1 **RESPONSE TO INTERROGATORY NO. 3.2:**

2 The District objects to this Request because it relates to issues outside the scope of class  
3 certification. At this time the Court has limited discovery in this matter to class certification.  
4 Furthermore, the District objects to this Request because it is a public entity.

5 **INTERROGATORY NO. 3.3:**

6 Are you a limited liability company? If so, state:

- 7 (a) the name stated in the current articles of organization;  
8 (b) all other names used by the company during the past 10 years and the date each  
9 was used;  
10 (c) the date and place of filing of the articles of organization;  
11 (d) the **ADDRESS** of the principal place of business; and  
12 (e) whether you are qualified to do business in California.

13 **RESPONSE TO INTERROGATORY NO. 3.3:**

14 The District objects to this Request because it relates to issues outside the scope of class  
15 certification. At this time the Court has limited discovery in this matter to class certification.  
16 Furthermore, the District objects to this Request because it is a public entity.

17 **INTERROGATORY NO. 3.4:**

18 Are you a joint venture? If so, state:

- 19 (a) the current joint venture name;  
20 (b) all other names used by the joint venture during the past 10 years and the dates  
21 each was used;  
22 (c) the name and **ADDRESS** of each joint venturer; and  
23 (d) the **ADDRESS** of the principal place of business.

24 **RESPONSE TO INTERROGATORY NO. 3.4:**

25 The District objects to this Request because it relates to issues outside the scope of class  
26 certification. At this time the Court has limited discovery in this matter to class certification.  
27 Furthermore, the District objects to this Request because it is a public entity.

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1 **INTERROGATORY NO. 3.5:**

2 Are you an unincorporated association? If so, state:

3 (a) the current unincorporated association name;

4 (b) all other names used by the unincorporated association during the past 10 years  
5 and the dates each was used; and

6 (c) the **ADDRESS** of the principal place of business.

7 **RESPONSE TO INTERROGATORY NO. 3.5:**

8 The District objects to this Request because it relates to issues outside the scope of class  
9 certification. At this time the Court has limited discovery in this matter to class certification.

10 Furthermore, the District objects to this Request because it is a public entity.

11 **INTERROGATORY NO. 3.6:**

12 Have you done business under a fictitious name during the past 10 years? If so, for each  
13 fictitious name state:

14 (a) the name;

15 (b) the dates each was used;

16 (c) the state and county of each fictitious name filing; and

17 (d) the **ADDRESS** of the principal place of business.

18 **RESPONSE TO INTERROGATORY NO. 3.6:**

19 The District objects to this Request because it relates to issues outside the scope of class  
20 certification. At this time the Court has limited discovery in this matter to class certification.

21 Furthermore, the District objects to this Request because it is a public entity.

22 **INTERROGATORY NO. 3.7:**

23 Within the past five years has any public entity registered or licensed your businesses? If  
24 so, for each license or registration:

25 (a) identify the license or registration;

26 (b) state the name of the public entity; and

27 (c) state the dates of issuance and expiration.

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1 **RESPONSE TO INTERROGATORY NO. 3.7:**

2 The District objects to this Request because it relates to issues outside the scope of class  
3 certification. At this time the Court has limited discovery in this matter to class certification.  
4 Furthermore, the District objects to this Request because it is a public entity.

5 **INTERROGATORY NO. 17.1:**

6 Is your response to each request for admission served with these interrogatories an  
7 unqualified admission? If not, for each response that is not an unqualified admission:


- 8 (a) state the number of the request;
- 9 (b) state all facts upon which you base your response;
- 10 (c) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who  
11 have knowledge of those facts; and
- 12 (d) identify all **DOCUMENTS** and other tangible things that support your response  
13 and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each  
14 **DOCUMENT** or thing.

15 **RESPONSE TO INTERROGATORY NO. 17.1:**

16 The District objects to this Request because it relates to issues outside the scope of class  
17 certification. At this time the Court has limited discovery in this matter to class certification.

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19 Dated: April 7, 2008

BEST BEST & KRIEGER LLP

20  
21 By   
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24 STEFANIE D. HEDLUND  
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27 WATERWORKS DISTRICT NO. 40  
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