

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

**EXEMPT FROM FILING FEES
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SECTION 6103**

6 OFFICE OF COUNTY COUNSEL
COUNTY OF LOS ANGELES
RAYMOND G. FORTNER, JR., Bar No. 42230
7 COUNTY COUNSEL
FREDERICK W. PFAEFFLE, Bar No. 145742
8 SENIOR DEPUTY COUNTY COUNSEL
500 WEST TEMPLE STREET
9 LOS ANGELES, CALIFORNIA 90012
TELEPHONE: (213) 974-1901
10 TELECOPIER: (213) 458-4020

11 Attorneys for Cross-Complainant
LOS ANGELES COUNTY WATERWORKS
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
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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 REQUEST FOR
ADMISSIONS 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 the Request for Admissions, 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 Requests to the best of its knowledge, but in doing
13 so, reserves the right to amend its response at a future date. The District further reserves the right
14 to offer, at time of trial, facts, testimony or other evidence discovered subsequent to and not
15 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 Requests for Admission, Set One, the District does not
20 concede the 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.
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OBJECTIONS AND RESPONSES

The District incorporates fully the foregoing Preliminary Statement and General Objections into each of the following specific objections and responses, and no specific objection or response shall be construed to waive any of the General Objections.

REQUEST FOR ADMISSION NO. 1:

That CAMERON PROPERTIES, INC. owns no property in the Antelope Valley.

RESPONSE TO REQUEST FOR ADMISSION NO. 1:

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

REQUEST FOR ADMISSION NO. 2:

That YOU are making no claims concerning any property owned by CAMERON PROPERTIES, INC. situated in San Bernardino County.

RESPONSE TO REQUEST FOR ADMISSION NO. 2:

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

REQUEST FOR ADMISSION NO. 3:

That all property of CAMERON PROPERTIES, INC. situated in Los Angeles County is water-producing property for which permits have been granted by the State of California.

RESPONSE TO REQUEST FOR ADMISSION NO. 3:

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

REQUEST FOR ADMISSION NO. 4:

That there is no justification to take water from property of CAMERON PROPERTIES, INC. to be provided to homeowners in the Antelope Valley without applying the principles of inverse condemnation.

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1 **RESPONSE TO REQUEST FOR ADMISSION NO. 4:**

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 to the issue of class certification.

4 **REQUEST FOR ADMISSION NO. 5:**

5 That the action of the Plaintiff against CAMERON PROPERTIES, INC. has caused a
6 diminution in the value of the real property owned by CAMERON PROPERTIES, INC. situated
7 in the Llano/Phelan area of Los Angeles County.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 5:**

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

11 **REQUEST FOR ADMISSION NO. 6:**

12 That one of the purposes of filing the Complaint in the present action was to control the
13 property of CAMERON PROPERTIES, INC. without having to pay anything for doing so.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 6:**

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

17 **REQUEST FOR ADMISSION NO. 7:**

18 That YOU have failed and refused to delineate the specific property descriptions of
19 property YOU claim is part of the class of property within the Antelope Valley.

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 7:**

21 The District objects to this Request because it relates to issues outside the scope of class
22 certification. At this time the Court has limited discovery to the issue of class certification.

23 **REQUEST FOR ADMISSION NO. 8:**

24 That YOU are aware that the property of CAMERON PROPERTIES, INC. already has
25 water permits issued by the State of California and that water is used from the property owned by
26 CAMERON PROPERTIES, INC., but despite this knowledge, the Plaintiff is trying to dispossess
27 and take away property rights of CAMERON PROPERTIES, INC.

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1 **RESPONSE TO REQUEST FOR ADMISSION NO. 8:**

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 to the issue of class certification.

4 **REQUEST FOR ADMISSION NO. 9:**

5 That YOU have failed and refused to provide an adequate map to enable CAMERON
6 PROPERTIES, INC. to determine if any of its property is situated in what you refer to as the
7 “Antelope Valley”.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 9:**

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

11 **REQUEST FOR ADMISSION NO. 10:**

12 That the action of Plaintiff is not designed to include the property of CAMERON
13 PROPERTIES, INC.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 10:**

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

17 **REQUEST FOR ADMISSION NO. 11:**

18 That the Plaintiff does not have appropriate and prescriptive rights to CAMERON
19 PROPERTIES, INC. groundwater.

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 11:**

21 The District objects to this Request because it relates to issues outside the scope of class
22 certification. At this time the Court has limited discovery to the issue of class certification.

23 **REQUEST FOR ADMISSION NO. 12:**

24 That the Plaintiff has no right to claim an easement by prescription against any of the
25 property of CAMERON PROPERTIES, INC.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 12:**

27 The District objects to this Request because it relates to issues outside the scope of class
28 certification. At this time the Court has limited discovery to the issue of class certification.

1 **REQUEST FOR ADMISSION NO. 13:**

2 That the Plaintiff has engaged in selective joinder by totally omitting contiguous
3 properties which are directly aligned with the property of CAMERON PROPERTIES, INC.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 13:**

5 The District objects to this Request because it relates to issues outside the scope of class
6 certification. At this time the Court has limited discovery to the issue of class certification.

7 **REQUEST FOR ADMISSION NO. 14:**

8 That YOU have no legal document that establishes the property of CAMERON
9 PROPERTIES, INC. in the Antelope Valley.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 14:**

11 The District objects to this Request because it relates to issues outside the scope of class
12 certification. At this time the Court has limited discovery to the issue of class certification.

13 **REQUEST FOR ADMISSION NO. 15:**

14 That each of the affirmative defenses alleged in the Answer applies to the action of the
15 Plaintiff and precludes and bars recovery by Plaintiff.


16 **RESPONSE TO REQUEST FOR ADMISSION NO. 15:**

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

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Dated: April 7, 2008

BEST BEST & KRIEGER LLP

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