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**EXEMPT FROM FILING FEES
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SECTION 6103**

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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
26
27
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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
PRODUCTION OF DOCUMENTS 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 Production of Documents Set One propounded
8 by Cross-Defendant, CAMERON PROPERTIES, INC. ("Cameron"), as follows:

9 **PRELIMINARY STATEMENT**

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

16 **GENERAL OBJECTIONS**

17 By responding to Cameron's Demand for Inspection and Production of Documents, Set
18 One, the District does not concede the relevancy or materiality of any request, or of the subject to
19 which such request refers.

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

24 The District objects to each of Cameron's demands to the extent any is directed to any
25 information or document that is subject to the attorney-client, attorney work product, or is
26 confidential and not subject to discovery on any other grounds. The District will not supply or
27 render any information or documents protected from discovery under these or any other
28 applicable privileges. If privileged information or documents are produced, such production is

1 inadvertent, and the District demands the immediate return of any document containing such
2 information.

3 The District further objects to the requests for production to the extent they seek
4 information or materials not presently in the District's possession. The District's investigation
5 and discovery in this case are ongoing. The following responses are given without prejudice to
6 the Districts' right to produce or rely on any evidence subsequently discovered.

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

10 **OBJECTIONS AND RESPONSES**

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

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15 **REQUEST FOR PRODUCTION NO. 1:**

16 Copies of all title reports concerning property claimed to be within the Antelope Valley
17 District.

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 1:**

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 to class certification. Furthermore, the
21 District objects to this Request to the extent it is burdensome and oppressive because it calls for
22 information related to all property owners.

23 **REQUEST FOR PRODUCTION NO. 2:**

24 Copies of all Minutes, contracts, agreements, ordinances, statues, etc. concerning matters
25 related to the Antelope Valley Water District.

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1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 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 to class certification. Furthermore, the
4 District objects to this Request as vague and ambiguous because the District is unaware of any
5 existing entity known as the "Antelope Valley Water District."

6 **REQUEST FOR PRODUCTION NO. 3:**

7 Copies of all Minutes or other authority that granted the Plaintiff the power and authority
8 to proceed with the present proceedings.

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 3:**

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

12 **REQUEST FOR PRODUCTION NO. 4:**

13 All records concerning the precise identity of each member YOU contend owns property
14 with the area in the Antelope Valley.

15 **RESPONSE TO REQUEST FOR PRODUCTION NO. 4:**

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 to class certification. Furthermore, the
18 District objects to this Request to the extent it is burdensome and oppressive because it calls for
19 information related to all property owners. The District also objects to the Request to the extent it
20 is vague and ambiguous as to "member."

21 **REQUEST FOR PRODUCTION NO. 5:**

22 All records of all proof that establishes that the property of CAMERON PROPERTIES,
23 INC. is located in the Antelope Valley.

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 5:**

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 to class certification. The District has
27 previously provided this information to Cameron but will do so again.

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1 **REQUEST FOR PRODUCTION NO. 6:**

2 All notes, Minutes, resolution from all meetings by any Board of Directors or other Board
3 authorizing the Plaintiff to commence and maintain the present action.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 6:**

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 class certification.

7 **REQUEST FOR PRODUCTION NO. 7:**

8 All records and documents that support YOUR contention that it is necessary to join
9 CAMERON PROPERTIES, INC. with the present proceeding.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 7:**

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 class certification.

13 **REQUEST FOR PRODUCTION NO. 8:**

14 All records of all sub-classifications to include those that produce water from their own
15 property.

16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 8:**

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 class certification. Furthermore, the
19 District objects to this Request to the extent it is vague and ambiguous as to "sub-classifications."

20 **REQUEST FOR PRODUCTION NO. 9:**

21 All records that establish that CAMERON PROPERTIES, INC. owns any property that
22 would be subject to the contentions made by the Plaintiff in the Complaint.

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1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 9:**

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 class certification. The District has
4 previously provided Cameron with this information but will do so again.

5 Dated: April 7, 2008

BEST BEST & KRIEGER LLP

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8 By  _____
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