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6 ROSAMOND COMMUNITY SERVICES  
DISTRICT

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

7  
8  
9 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
10 COUNTY OF LOS ANGELES – CENTRAL DISTRICT

11  
12 **ANTELOPE VALLEY  
GROUNDWATER CASES**

13 Included Actions:  
14 Los Angeles County Waterworks District  
No. 40 v. Diamond Farming Co., Superior  
15 Court of California, County of Los  
Angeles, Case No. BC 325201;

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

19 Wm. Bolthouse Farms, Inc. v. City of  
Lancaster, Diamond Farming Co. v. City of  
20 Lancaster, Diamond Farming Co. v.  
Palmdale Water Dist., Superior Court of  
21 California, County of Riverside, Case Nos.  
RIC 353 840, RIC 344 436, RIC 344 668

Judicial Council Coordination No. 4408  
Santa Clara Case No. 1-05-CV-049053  
Assigned to The Honorable Jack Komar

**ROSAMOND COMMUNITY SERVICES  
DISTRICT'S OBJECTIONS TO  
REQUEST FOR ADMISSIONS BY  
CAMERON PROPERTIES, INC.**

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23  
24 PROPOUNDING PARTY: Cross-Defendant CAMERON PROPERTIES, INC.

25 RESPONDING PARTY: Cross-Complainant ROSAMOND COMMUNITY SERVICES  
26 DISTRICT

27 SET NUMBER: One (1)

1 Cross-Complainant, ROSAMOND COMMUNITY SERVICES DISTRICT (the  
2 “District”) hereby responds to the Request for Admissions, Set One, propounded by Cross-  
3 Defendant, CAMERON PROPERTIES, INC. (“Cameron”), as follows:  
4

5 **PRELIMINARY STATEMENT**

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

13 **GENERAL OBJECTIONS**

14 By responding to Cameron’s Requests for Admission, Set One, the District does not  
15 concede the relevancy or materiality of any request, or of the subject to which such request refers.

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

20 The specific responses and objections given below are submitted without prejudice to, and  
21 without waiving, any of these general objections even though the general objections are not  
22 expressly set forth in each response.  
23

24 **OBJECTIONS AND RESPONSES**

25 The District incorporates fully the foregoing Preliminary Statement and General  
26 Objections into each of the following specific objections and responses, and no specific objection  
27 or response shall be construed to waive any of the General Objections.  
28

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

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

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

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

6 **REQUEST FOR ADMISSION NO. 2:**

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

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 2:**

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 the issue of class certification.

12 **REQUEST FOR ADMISSION NO. 3:**

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

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 3:**

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 the issue of class certification.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

28

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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. 14:**

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

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

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 to the issue of class certification.

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

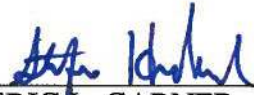
11 That each of the affirmative defenses alleged in the Answer applies to the action of the  
12 Plaintiff and precludes and bars recovery by Plaintiff.

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

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 to the issue of class certification.

16 Dated: April 7, 2008

BEST BEST & KRIEGER LLP

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18 By   
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