

BERNARD G. LE BEAU, JR.
DENNIS R. THELEN
THOMAS S. MCINTOSH
THOMAS A. CREAR
J. NILE KINNEY
BOB H. JOYCE
THOMAS P. FEHER
PATRICK C. CARRICK
LORNA H. BRUMFIELD
FRANKLIN D. GORDON
MARK R. BATEMAN



W. STEVEN SHAYER
ALAN J. MISH
ANDREW K. SHEFFIELD
NICHOLAS C. MEARS
MELISSA H. BROWN
KEVIN E. THELEN
DAVID C. BYNUM

OF COUNSEL:
J. SUZANNE HILL

January 21, 2009

Via Electronic Posting

Wayne K. Lemieux, Esq.
Lemieux & O'Neill
2393 Townsgate Road, Suite 201
Westlake Village, CA 91361

And to All Other Counsel Identified on Attached Service List

Re: *Antelope Valley Groundwater Adjudication*
Meet and Confer Meeting Scheduled for January 27, 2009

To All Counsel:

First, I thank Mr. Lemieux for taking the lead in arranging for the meet and confer to address discovery issues. However, the agenda needs to be broadened to include a discussion of the purveyors' intentions regarding previously propounded written discovery to which objections have been made and which have been the subject matter of previous communications between various parties. I have spoken with Mr. Kalfayan and Mr. Zimmer, each have written discovery to which objections were interposed and the propriety of those objections are in dispute. Likewise, the undersigned has previously propounded written discovery to which objections were interposed and the propriety of those objections are likewise in dispute.

With respect to addressing written discovery, and coordination of same, it is the position of Mr. Kalfayan and the undersigned that a good place to start would be with the already propounded written discovery to which objections have been interposed.

Therefore, we would request that the purveyors, identified on attached service list, be prepared to discuss that previously propounded discovery at the meeting on January 27, 2009. Specifically, Mr. Kalfayan and the undersigned request that you specifically identify by number each

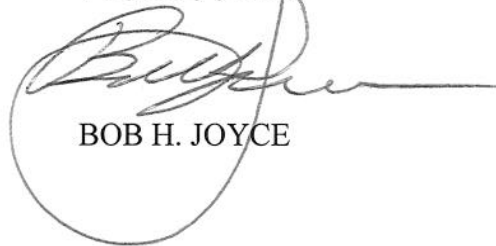
All Counsel
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written discovery request to which you intend to stand upon previously asserted objections. With respect to the operative discovery propounded by Diamond Farming, we would direct your attention to the following:

1. Request for Admissions (Set One);
2. Form Interrogatories (Set One);
3. Special Interrogatories (Set One); and,
4. Request for Production of Documents (Set One).

With respect to the foregoing, please identify in writing each of the separate inquiries or request to which you intend to stand upon the objection previously interposed. As each of you are aware, each of those objections has previously been briefed in connection with a Motion to Compel which has yet to be ruled upon. If we cannot, through our efforts at the meeting next Tuesday, resolve these discovery disputes, we will be forced to re-notice those Motions to Compel. In anticipation of a more reasonable solution, I look forward to seeing all of you on Tuesday.

Very truly yours,



BOB H. JOYCE

BHJ:dml
cc: Jeffrey A. Green, Esq.

Public Water Suppliers - Discovery Service List

ATTORNEY	PARTY
John Tootle, Esq.	California Water Service Company
Douglas J. Evertz, Esq.	City of Lancaster
Steven Orr, Esq.	City of Palmdale
Wayne Lemieux, Esq.	Littlerock Creek Irrigation District
Jeffrey Dunn, Esq.	Los Angeles County Water Works District No. 40
Thomas Bunn, Esq.	Palmdale Water District
Jeffrey Dunn, Esq.	Rosamond Community Services District
Wayne Lemieux, Esq.	Palm Ranch Irrigation District
Bradley Weeks, Esq.	Quartz Hill Water District

PROOF OF SERVICE

1 ANTELOPE VALLEY GROUNDWATER CASES
2 JUDICIAL COUNCIL PROCEEDING NO. 4408
3 CASE NO.: 1-05-CV-049053

4 I am a citizen of the United States and a resident of the county aforesaid; I am over the age
5 of eighteen years and not a party to the within action; my business address is: 5001 E. Commercenter
6 Drive, Suite 300, Bakersfield, California 93309. On January 21, 2009, I served the within **LETTER**
7 **TO ALL COUNSEL RE MEET & CONFER MEETING**

8 **(BY POSTING)** I am "readily familiar" with the Court's Clarification Order.
9 Electronic service and electronic posting completed through www.scefilng.org ; All papers filed
10 in Los Angeles County Superior Court and copy sent to trial judge and Chair of Judicial Council.

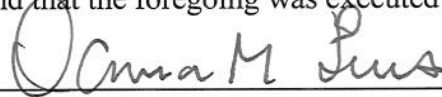
11 Los Angeles County Superior Court
12 111 North Hill Street
13 Los Angeles, CA 90012
14 Attn: **Department 1**
(213) 893-1014

Chair, Judicial Council of California
Administrative Office of the Courts
Attn: Appellate & Trial Court Judicial Services
(Civil Case Coordinator)
Carlotta Tillman
455 Golden Gate Avenue
San Francisco, CA 94102-3688
Fax (415) 865-4315

15 **(BY MAIL)** I am "readily familiar" with the firm's practice of collection and
16 processing correspondence for mailing. Under that practice it would be deposited with the U.S.
17 Postal Service on that same day with postage thereon fully prepaid at Bakersfield, California, in
18 the ordinary course of business.

19 **(OVERNIGHT/EXPRESS MAIL)** By enclosing a true copy thereof in a sealed
20 envelope designated by United States Postal Service (Overnight Mail)/Federal Express/United
21 Parcel Service ("UPS") addressed as shown on the above by placing said envelope(s) for ordinary
22 business practices from Kern County. I am readily familiar with this business' practice of
23 collecting and processing correspondence for overnight/express/UPS mailing. On the same day
24 that the correspondence is placed for collection and mailing, it is deposited in the ordinary course
25 of business with the United States Postal Service/Federal Express/UPS in a sealed envelope with
26 delivery fees paid/provided for at the facility regularly maintained by United States Postal Service
27 (Overnight Mail/Federal Express/United Postal Service [or by delivering the documents to an
28 authorized courier or driver authorized by United States Postal Service (Overnight Mail)/Federal
Express/United Postal Service to receive documents].

26 **(STATE)** I declare under penalty of perjury under the laws of the State of
27 California that the above is true and correct, and that the foregoing was executed on January 21,
28 2009, in Bakersfield, California.



DONNA M. LUIS