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Bob H. Joyce, (SBN 84607)
Dave R. Lampe (SBN 77100)
Andrew Sheffield (SBN 220735)
LAW OFFICES OF
LEBEAU • THELEN, LLP
5001 East Commercenter Drive, Suite 300
Post Office Box 12092
Bakersfield, California 93389-2092
(661) 325-8962; Fax (661) 325-1127

Attorneys for DIAMOND FARMING COMPANY,
a California corporation

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF LOS ANGELES

Coordination Proceeding Special Title
(Rule 1550 (b))

ANTELOPE VALLEY GROUNDWATER
CASES

Included actions:

Los Angeles County Waterworks District No.
40 vs. Diamond Farming Company
Los Angeles Superior Court
Case No. BC 325201

Los Angeles County Waterworks District No.
40 vs. Diamond Farming Company
Kern County Superior Court
Case No. S-1500-CV 254348 NFT

Diamond Farming Company vs. City of
Lancaster
Riverside County Superior Court
Lead Case No. RIC 344436 [Consolidated
w/Case Nos. 344668 & 353840]

Judicial Council Coordination No. 4408

Case No.: 1-05-CV-049053

**REQUEST FOR PRODUCTION OF
DOCUMENTS [SET ONE]**

PROPOUNDING PARTY : DIAMOND FARMING COMPANY
RESPONDING PARTY : EACH CROSS-COMPLAINING PUBLIC WATER
SUPPLIER LISTED ON EXHIBIT 1
SET NO. : ONE

1 Pursuant to Code of Civil Procedure section 2031.010 et seq., DIAMOND FARMING
2 COMPANY, hereby demands that responding party produce for inspection and copying at the Law
3 Offices of LeBeau - Thelen, LLP, 5001 East Commercenter Drive, Suite 300, Bakersfield, California,
4 at the hour of 10:00 a.m. on June 25, 2007, all matters and things set forth below in the possession of
5 responding party, his/her/their/its agents or anyone acting on their behalf.

6 **DEFINITIONS**

7 Words in **BOLDFACE CAPITALS** in this production request are defined as follows:

8 (a) **YOU** includes you, the responding party, your agents, your employees, your
9 consultants, their agents, their employees, your attorneys, your accountants, your investigators, and
10 anyone else acting on your behalf.

11 (b) **PERSON** includes a natural person, firm, association, organization, partnership,
12 business trust, limited liability company, corporation, or public entity.

13 (c) **BASIN** means the area located within the jurisdictional boundary of the Antelope
14 Valley Groundwater Cases as defined by the Revised Order After Hearing on Jurisdictional Boundary
15 dated March 12, 2007.

16 (d) **WRITING** includes the original or a copy of handwriting, typewriting, printing,
17 photostating, photographing, and every other means of recording upon any tangible thing, any form of
18 communication or representation, including letters, words, pictures, sounds, and symbols, or
19 combinations thereof. (Evid. Code, § 250.)

20 **ITEMS TO BE PRODUCED**

21 **REQUEST NO. 1:**

22 Produce each WRITING which YOU contend supports your contention that all landowners had
23 actual notice of your adverse claim of right.

24 **REQUEST NO. 2:**

25 Produce each WRITING which YOU contend supports your contention that any landowner had
26 actual notice of your adverse claim of right.

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1 **REQUEST NO. 3:**

2 Produce each WRITING which YOU contend supports your contention that all landowners had
3 constructive notice of your adverse claim of right.

4 **REQUEST NO. 4:**

5 Produce each WRITING which YOU contend supports your contention that any landowner had
6 constructive notice of your adverse claim of right.

7 **REQUEST NO. 5:**

8 Produce each WRITING which YOU contend supports your contention that the right of any
9 property owner to pump water from the BASIN is subordinate to your prescriptive right.

10 **REQUEST NO. 6:**

11 Produce each WRITING identified or described in any response to any of the interrogatories
12 which were served concurrently with this request.

13 Dated: May 25, 2007

LeBEAU • THELEN, LLP

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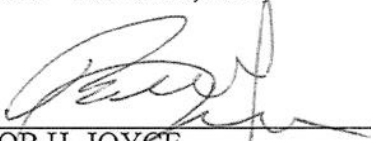
By: 
BOB H. JOYCE
Attorneys for DIAMOND FARMING COMPANY,
a California corporation

Exhibit 1

Responding Parties to Diamond Farming Company's Request for Production of Documents
[Set One]

California Water Service Company
City of Lancaster
City of Palmdale
Littlerock Creek Irrigation District
Los Angeles County Water Works District No. 40
Palmdale Water District
Rosamond Community Services District
Palm Ranch Irrigation District
Quartz Hill Water District

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PROOF OF SERVICE

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

I am a citizen of the United States and a resident of the county aforesaid; I am over the age of eighteen years and not a party to the within action; my business address is: 5001 E. Commercenter Drive, Suite 300, Bakersfield, California 93309. On May 25, 2007, I served the within **REQUEST FOR PRODUCTION OF DOCUMENTS [SET ONE]**

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

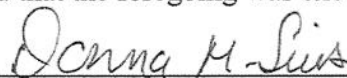
Los Angeles County Superior Court
111 North Hill Street
Los Angeles, CA 90012
Attn: **Department 1**
(213) 893-1014

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

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

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

(STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct, and that the foregoing was executed on May 25, 2007, in Bakersfield, California.



DONNA M. LUIS

1 THE SUPERIOR COURT OF CALIFORNIA, COUNTY OF SANTA CLARA
ELECTRONIC FILING SYSTEM - WWW.SCEFILING.ORG

2 Electronic Proof of Service
Page 2

3 Document(s) submitted by Bob Joyce of LeBeau-Thelen, LLP on Fri. May 25, 2007 at 11:51 AM PDT

4 1. Discovery (e-service only): REQUEST FOR PRODUCTION OF DOCUMENTS [SET ONE]
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