

EXHIBIT D

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

Attorneys for Defendants and Cross-Complainants,
Palmdale Water District and Quartz Hill Water District

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

Coordination Proceeding
Special Title (Rule 1550 (b))
**ANTELOPE VALLEY GROUNDWATER
CASES**

Judicial Council Coordination
Proceeding No. 4408
CLASS ACTION
[Assigned to The Honorable Jack Komar, Judge
Santa Clara County Superior Court, Dept. 17]
Santa Clara Court Case No. 1-05-CV-049053

**PALMDALE WATER DISTRICT'S AND
QUARTZ HILL WATER DISTRICT'S
RESPONSES TO REQUESTS FOR
ADMISSIONS, SET ONE**

PROPOUNDING PARTY: Diamond Farming Company
RESPONDING PARTY: Palmdale Water District and Quartz Hill Water District
SET NUMBER: One (1)
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1 OBJECTION TO REQUEST NO. 1:

2 Objection. This request is not reasonably calculated to lead to the discovery of admissible
3 evidence. The request is manifestly irrelevant and calculated to harass.

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5 RESPONSE TO REQUEST NO. 2:

6 Palmdale Water District and Quartz Hill Water District admit that they are public entities.

7
8 OBJECTION TO REQUEST NO. 3:

9 Objection. The request is premature, burdensome and oppressive. This request seeks
10 information concerning class members and the court has not yet completed its class certification process.
11 No class representative has yet been approved by the court.

12
13 OBJECTION TO REQUEST NO. 4:

14 Objection. The request is premature, burdensome and oppressive. This request seeks
15 information concerning class members and the court has not yet completed its class certification process.
16 No class representative has yet been approved by the court.

17
18 OBJECTION TO REQUEST NO. 5:

19 Objection. The request is premature, burdensome and oppressive. This request seeks
20 information concerning class members and the court has not yet completed its class certification process.
21 No class representative has yet been approved by the court.

22
23 OBJECTION TO REQUEST NO. 6:

24 Objection. The request is premature, burdensome and oppressive. This request seeks
25 information concerning class members and the court has not yet completed its class certification process.
26 No class representative has yet been approved by the court.

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1 OBJECTION TO REQUEST NO. 7:

2 Objection. The request is premature, burdensome and oppressive. This request seeks
3 information concerning class members and the court has not yet completed its class certification process.
4 No class representative has yet been approved by the court.

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6 OBJECTION TO REQUEST NO. 8:

7 Objection. The request is premature, burdensome and oppressive. This request seeks
8 information concerning class members and the court has not yet completed its class certification process.
9 No class representative has yet been approved by the court.

10
11 OBJECTION TO REQUEST NO. 9:

12 Objection. The request is premature, burdensome and oppressive. This request seeks
13 information concerning class members and the court has not yet completed its class certification process.
14 No class representative has yet been approved by the court.

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16 OBJECTION TO REQUEST NO. 10:

17 Objection. The request is premature, burdensome and oppressive. This request seeks
18 information concerning class members and the court has not yet completed its class certification process.
19 No class representative has yet been approved by the court.

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21 OBJECTION TO REQUEST NO. 11:

22 Objection. The request is premature, burdensome and oppressive. This request seeks
23 information concerning class members and the court has not yet completed its class certification process.
24 No class representative has yet been approved by the court.

25
26 OBJECTION TO REQUEST NO. 12:

27 Objection. The request is premature, burdensome and oppressive. This request seeks
28 information concerning class members and the court has not yet completed its class certification process.

1 No class representative has yet been approved by the court.

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3 OBJECTION TO REQUEST NO. 13:

4 Objection. The request is premature, burdensome and oppressive. This request seeks
5 information concerning class members and the court has not yet completed its class certification process.
6 No class representative has yet been approved by the court.

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8 OBJECTION TO REQUEST NO. 14:

9 Objection. The request is premature, burdensome and oppressive. This request seeks
10 information concerning class members and the court has not yet completed its class certification process.
11 No class representative has yet been approved by the court.

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13 OBJECTION TO REQUEST NO. 15:

14 Objection. The request is premature, burdensome and oppressive. This request seeks
15 information concerning class members and the court has not yet completed its class certification process.
16 No class representative has yet been approved by the court.

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18 OBJECTION TO REQUEST NO. 16:

19 Objection. The request is premature, burdensome and oppressive. This request seeks
20 information concerning class members and the court has not yet completed its class certification process.
21 No class representative has yet been approved by the court.

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23 OBJECTION TO REQUEST NO. 17:

24 Objection. The request is premature, burdensome and oppressive. This request seeks
25 information concerning class members and the court has not yet completed its class certification process.
26 No class representative has yet been approved by the court.

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OBJECTION TO REQUEST NO. 18:

Objection. The request is premature, burdensome and oppressive. This request seeks information concerning class members and the court has not yet completed its class certification process. No class representative has yet been approved by the court.

OBJECTION TO REQUEST NO. 19:

Objection. The request is premature, burdensome and oppressive. This request seeks information concerning class members and the court has not yet completed its class certification process. No class representative has yet been approved by the court.

OBJECTION TO REQUEST NO. 20:

Objection. The request is premature, burdensome and oppressive. This request seeks information concerning class members and the court has not yet completed its class certification process. No class representative has yet been approved by the court.

OBJECTION TO REQUEST NO. 21:

Objection. The request is premature, burdensome and oppressive. This request seeks information concerning class members and the court has not yet completed its class certification process. No class representative has yet been approved by the court.

OBJECTION TO REQUEST NO. 22:

Objection. The request is premature, burdensome and oppressive. This request seeks information concerning class members and the court has not yet completed its class certification process. No class representative has yet been approved by the court.

OBJECTION TO REQUEST NO. 23:

Objection. The request is premature, burdensome and oppressive. This request seeks

1 information concerning class members and the court has not yet completed its class certification process.
2 No class representative has yet been approved by the court.

3
4 OBJECTION TO REQUEST NO. 24:

5 Objection. The request is premature, burdensome and oppressive. This request seeks
6 information concerning class members and the court has not yet completed its class certification process.
7 No class representative has yet been approved by the court.

8
9 OBJECTION TO REQUEST NO. 25:

10 Objection. The request is premature, burdensome and oppressive. This request seeks
11 information concerning class members and the court has not yet completed its class certification process.
12 No class representative has yet been approved by the court.

13
14 OBJECTION TO REQUEST NO. 26:

15 Objection. The request is premature, burdensome and oppressive. This request seeks
16 information concerning class members and the court has not yet completed its class certification process.
17 No class representative has yet been approved by the court.

18
19 OBJECTION TO REQUEST NO. 27:

20 Objection. The request is premature, burdensome and oppressive. This request seeks
21 information concerning class members and the court has not yet completed its class certification process.
22 No class representative has yet been approved by the court.

23
24 OBJECTION TO REQUEST NO. 28:

25 Objection. The request is premature, burdensome and oppressive. This request seeks
26 information concerning class members and the court has not yet completed its class certification process.
27 No class representative has yet been approved by the court.

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1 OBJECTION TO REQUEST NO. 29:

2 Objection. The request is premature, burdensome and oppressive. This request seeks
3 information concerning class members and the court has not yet completed its class certification process.
4 No class representative has yet been approved by the court.

5
6 OBJECTION TO REQUEST NO. 30:

7 Objection. The request is premature, burdensome and oppressive. This request seeks
8 information concerning class members and the court has not yet completed its class certification process.
9 No class representative has yet been approved by the court.

10
11 OBJECTION TO REQUEST NO. 31:

12 Objection. The request is premature, burdensome and oppressive. This request seeks
13 information concerning class members and the court has not yet completed its class certification process.
14 No class representative has yet been approved by the court.

15
16 OBJECTION TO REQUEST NO. 32:

17 Objection. The request is premature, burdensome and oppressive. This request seeks
18 information concerning class members and the court has not yet completed its class certification process.
19 No class representative has yet been approved by the court.

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21 OBJECTION TO REQUEST NO. 33:

22 Objection. The request is premature, burdensome and oppressive. This request seeks
23 information concerning class members and the court has not yet completed its class certification process.
24 No class representative has yet been approved by the court.

25
26 OBJECTION TO REQUEST NO. 34:

27 Objection. The request is premature, burdensome and oppressive. This request seeks
28 information concerning class members and the court has not yet completed its class certification process.

1 No class representative has yet been approved by the court.

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3 OBJECTION TO REQUEST NO. 35:

4 Objection. The request is premature, burdensome and oppressive. This request seeks
5 information concerning class members and the court has not yet completed its class certification process.
6 No class representative has yet been approved by the court.

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8 OBJECTION TO REQUEST NO. 36:

9 Objection. The request is premature, burdensome and oppressive. This request seeks
10 information concerning class members and the court has not yet completed its class certification process.
11 No class representative has yet been approved by the court.

12

13 OBJECTION TO REQUEST NO. 37:

14 Objection. The request is premature, burdensome and oppressive. This request seeks
15 information concerning class members and the court has not yet completed its class certification process.
16 No class representative has yet been approved by the court.

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18 OBJECTION TO REQUEST NO. 38:

19 Objection. The request is premature, burdensome and oppressive. This request seeks
20 information concerning class members and the court has not yet completed its class certification process.
21 No class representative has yet been approved by the court.

22

23 OBJECTION TO REQUEST NO. 39:

24 Objection. The request is premature, burdensome and oppressive. This request seeks
25 information concerning class members and the court has not yet completed its class certification process.
26 No class representative has yet been approved by the court.

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1 OBJECTION TO REQUEST NO. 40:

2 Objection. The request is premature, burdensome and oppressive. This request seeks
3 information concerning class members and the court has not yet completed its class certification process.
4 No class representative has yet been approved by the court.

5
6 OBJECTION TO REQUEST NO. 41:

7 Objection. The request is premature, burdensome and oppressive. This request seeks
8 information concerning class members and the court has not yet completed its class certification process.
9 No class representative has yet been approved by the court.

10
11 OBJECTION TO REQUEST NO. 42:

12 Objection. The request is premature, burdensome and oppressive. This request seeks
13 information concerning class members and the court has not yet completed its class certification process.
14 No class representative has yet been approved by the court.

15
16 OBJECTION TO REQUEST NO. 43:

17 Objection. The request is premature, burdensome and oppressive. This request seeks
18 information concerning class members and the court has not yet completed its class certification process.
19 No class representative has yet been approved by the court.

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21 OBJECTION TO REQUEST NO. 44:

22 Objection. The request is premature, burdensome and oppressive. This request seeks
23 information concerning class members and the court has not yet completed its class certification process.
24 No class representative has yet been approved by the court.

25
26 OBJECTION TO REQUEST NO. 45:

27 Objection. The request is premature, burdensome and oppressive. This request seeks
28 information concerning class members and the court has not yet completed its class certification process.

1 No class representative has yet been approved by the court.

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3 OBJECTION TO REQUEST NO. 46:

4 Objection. The request is premature, burdensome and oppressive. This request seeks
5 information concerning class members and the court has not yet completed its class certification process.

6 No class representative has yet been approved by the court.

7

8 OBJECTION TO REQUEST NO. 47:

9 Objection. The request is premature, burdensome and oppressive. This request seeks
10 information concerning class members and the court has not yet completed its class certification process.

11 No class representative has yet been approved by the court.

12

13 OBJECTION TO REQUEST NO. 48:

14 Objection. The request is premature, burdensome and oppressive. This request seeks
15 information concerning class members and the court has not yet completed its class certification process.

16 No class representative has yet been approved by the court.

17

18 OBJECTION TO REQUEST NO. 49:

19 Objection. The request is premature, burdensome and oppressive. This request seeks
20 information concerning class members and the court has not yet completed its class certification process.

21 No class representative has yet been approved by the court.

22

23 OBJECTION TO REQUEST NO. 50:

24 Objection. The request is premature, burdensome and oppressive. This request seeks
25 information concerning class members and the court has not yet completed its class certification process.

26 No class representative has yet been approved by the court.

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1 OBJECTION TO REQUEST NO. 51:

2 Objection. The request is premature, burdensome and oppressive. This request seeks
3 information concerning class members and the court has not yet completed its class certification process.
4 No class representative has yet been approved by the court.

5
6 OBJECTION TO REQUEST NO. 52:

7 Objection. The request is premature, burdensome and oppressive. This request seeks
8 information concerning class members and the court has not yet completed its class certification process.
9 No class representative has yet been approved by the court.

10
11 OBJECTION TO REQUEST NO. 53:

12 Objection. The request is premature, burdensome and oppressive. This request seeks
13 information concerning class members and the court has not yet completed its class certification process.
14 No class representative has yet been approved by the court.

15
16 OBJECTION TO REQUEST NO. 54:

17 Objection. The request is premature, burdensome and oppressive. This request seeks
18 information concerning class members and the court has not yet completed its class certification process.
19 No class representative has yet been approved by the court.

20
21 OBJECTION TO REQUEST NO. 55:

22 Objection. The request is premature, burdensome and oppressive. This request seeks
23 information concerning class members and the court has not yet completed its class certification process.
24 No class representative has yet been approved by the court.

25
26 OBJECTION TO REQUEST NO. 56:

27 Objection. The request is premature, burdensome and oppressive. This request seeks
28 information concerning class members and the court has not yet completed its class certification process.

1 No class representative has yet been approved by the court.

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3 OBJECTION TO REQUEST NO. 57:

4 Objection. The request is premature, burdensome and oppressive. This request seeks
5 information concerning class members and the court has not yet completed its class certification process.

6 No class representative has yet been approved by the court.

7

8 OBJECTION TO REQUEST NO. 58:

9 Objection. The request is premature, burdensome and oppressive. This request seeks
10 information concerning class members and the court has not yet completed its class certification process.

11 No class representative has yet been approved by the court.

12

13 OBJECTION TO REQUEST NO. 59:

14 Objection. The request is premature, burdensome and oppressive. This request seeks
15 information concerning class members and the court has not yet completed its class certification process.

16 No class representative has yet been approved by the court.

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18 OBJECTION TO REQUEST NO. 60:

19 Objection. The request is premature, burdensome and oppressive. This request seeks
20 information concerning class members and the court has not yet completed its class certification process.

21 No class representative has yet been approved by the court.

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24 Dated: June 26, 2007

LAGERLOF, SENECAL, GOSNEY & KRUSE, LLP

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By: 
Thomas S. Bunn III

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Attorneys for Defendants and Cross-Complainants
Palmdale Water District and Quartz Hill Water
District

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VERIFICATION

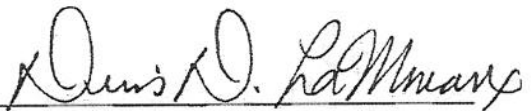
STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

I, Dennis D. LaMoreaux, the undersigned, say:

I am General Manager of Palmdale Water District, one of the defendants and cross-complainants in the above-entitled proceedings; I have read the foregoing **PALMDALE WATER DISTRICT'S AND QUARTZ HILL WATER DISTRICT'S RESPONSES TO REQUESTS FOR ADMISSIONS, SET ONE** and know the contents thereof; and I certify that the same is true of my own knowledge, except as to those matters which are therein stated upon my information or belief, and as to those matters I believe the same to be true.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on June 26, 2007, at Palmdale, California.


Dennis D. LaMoreaux, General Manager
Palmdale Water District

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VERIFICATION


STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

I, Chad Reed, the undersigned, say:

I am General Manager of Quartz Hill Water District, one of the defendants and cross-complainants in the above-entitled proceedings; I have read the foregoing **PALMDALE WATER DISTRICT'S AND QUARTZ HILL WATER DISTRICT'S RESPONSES TO REQUESTS FOR ADMISSIONS, SET ONE** and know the contents thereof; and I certify that the same is true of my own knowledge, except as to those matters which are therein stated upon my information or belief, and as to those matters I believe the same to be true.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on June 26, 2007, at Quartz Hill, California.


Chad Reed, General Manager
Quartz Hill Water District