

EXHIBIT G

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8 Attorneys for Defendants/Cross-Complainants
9 LITTLEROCK CREEK IRRIGATION DISTRICT, PALM RANCH IRRIGATION DISTRICT
10 And Cross-Defendants, NORTH EDWARDS WATER DISTRICT and DESERT LAKES COMMUNITY
11 SERVICES DISTRICT

12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

13 **IN AND FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

14 Coordinated Proceeding
15 Special Title (Rule 1550(b))

) **Judicial Council Coordination No. 4408**

16 ANTELOPE VALLEY GROUNDWATER
17 CASES

) Santa Clara Case No. 1-05-CV-049053
) Assigned to the Honorable Jack Komar – Dept. 17

18 Included Actions:

) **PALM RANCH IRRIGATION DISTRICT'S
) RESPONSE TO DIAMOND FARMING
) COMPANY'S FIRST SET OF REQUESTS
) FOR ADMISSIONS**

19 Los Angeles County Waterworks District No. 40
20 v. Diamond Farming Co. Los Angeles County
21 Superior Court Case No. BC 325201;

22 Los Angeles County Waterworks District No. 40
23 v. Diamond Farming Co., Kern County Superior
24 Court, Case No. S-1500-CV-234348;

25 Wm. Bolthouse Farms, Inc. v. City of Lancaster
26 Diamond Farming Co. v. City of Lancaster v.
27 Palmdale Water District, Riverside County
28 Superior Court, Consolidated Actions, Case Nos.
RIC 353840, RIC 344436, RIC 344668

AND RELATED CROSS-ACTIONS

1 PROPOUNDING PARTY: Diamond Farming Company
2 RESPONDING PARTY: Palm Ranch Irrigation District
3 SET NUMBER: One (Nos. 1-60)
4

5 Pursuant to California Code of Civil Procedure § 2033.10, Palm Ranch Irrigation District hereby
6 responds to Diamond Farming Company's First Set of Requests for Admissions as follows:

7 **I. PRELIMINARY STATEMENT**

8 1. Although Palm Ranch has conducted a good faith investigation in order to respond to these
9 Admissions, it has not completed its own investigation or discovery of this matter. By responding to this
10 discovery, Palm Ranch does not intend to preclude itself from providing supplemental responses or from
11 using, at a trial or other proceedings, information that it obtains subsequent to the date of these responses.

12 2. By these responses, Palm Ranch makes no admission concerning the relevance or
13 admissibility of any of the evidence cited, and further reserves the right to make all pertinent evidentiary
14 objections at trial or at any other stage of the proceedings.

15 **II. OBJECTIONS**

16 1. Palm Ranch objects to each request to the extent it calls for information protected by the
17 attorney-client or official information privileges or attorney work product doctrine.

18 **III. RESPONSES TO REQUEST FOR ADMISSIONS**

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

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

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

23 Deny.

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

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

1 representative has yet been approved by the court.

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

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

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

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

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

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

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

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

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

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

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

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

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 16:**

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

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

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

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 18:**

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

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 19:**

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

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 20:**

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

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 21:**

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

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

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

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

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

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 24:**

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

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

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

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 26:**

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

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 27:**

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

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 28:**

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

2 **RESPONSE TO REQUEST FOR ADMISSION NO. 29:**

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

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 30:**

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

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 31:**

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

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 32:**

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

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 33:**

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

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 34:**

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

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 35:**

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

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 36:**

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

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 37:**

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

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 38:**

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

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 39:**

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

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 40:**

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

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 41:**

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

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 42:**

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

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 43:**

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

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 44:**

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

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 45:**

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

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 46:**

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

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 47:**

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

2 **RESPONSE TO REQUEST FOR ADMISSION NO. 48:**

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

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 49:**

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

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 50:**

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

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 51:**

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

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 52:**

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

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 53:**

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

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 54:**

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

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 55:**

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

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 56:**

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

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 57:**

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

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 58:**

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

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 59:**

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

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA,)
3) ss.
4 COUNTY OF VENTURA)

5 I am employed in the County of Ventura, State of California. I am over the age of 18 and not a
6 party to the within action. My business address is 2393 Townsgate Road, Suite 201, Westlake Village,
California 91361.

7 On **June 26, 2007**, I posted the following document(s) to the website <http://www.scefiling.org>, a
8 dedicated link to the Antelope Valley Groundwater Cases:

9
10 **PALM RANCH IRRIGATION DISTRICT'S RESPONSE TO DIAMOND FARMING**
11 **COMPANY'S FIRST SET OF REQUEST FOR ADMISSIONS**

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

14 Executed on June 26, 2007, in Westlake Village, California.

15 /s/

16 _____
17 KATHI MIERS