

# EXHIBIT H

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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))

16 ANTELOPE VALLEY GROUNDWATER  
17 CASES

18 Included Actions:

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

) **Judicial Council Coordination No. 4408**  
)  
) Santa Clara Case No. 1-05-CV-049053  
) Assigned to the Honorable Jack Komar – Dept. 17

) **LITTLEROCK CREEK IRRIGATION**  
) **DISTRICT’S RESPONSE TO DIAMOND**  
) **FARMING COMPANY’S FIRST SET OF**  
) **REQUESTS FOR ADMISSIONS**

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

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

7 **I. PRELIMINARY STATEMENT**

8 1. Although Littlerock 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, Littlerock 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, Littlerock 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. Littlerock 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. 10:**

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. 11:**

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. 12:**

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. 13:**

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. 14:**

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. 15:**

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. 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

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

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.

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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 **RESPONSE TO REQUEST FOR ADMISSION NO. 60:**

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  
6 DATED: June 26, 2007

LEMIEUX & O'NEILL

7                               /s/

8 By: \_\_\_\_\_

9 W. KEITH LEMIEUX

Attorneys for LITTLE ROCK CREEK IRRIGATION  
DISTRICT and PALM RANCH IRRIGATION DISTRICT

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 **LITTLE ROCK CREEK 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