

EXHIBIT A

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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))

Judicial Council Coordination No. 4408

ANTELOPE VALLEY GROUNDWATER
CASES

Case No.: 1-05-CV-049053

Included actions:

SPECIAL INTERROGATORIES
[SET ONE]

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]

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 2030.010, et seq., DIAMOND FARMING
2 COMPANY, hereby requests that responding party answer under oath, Special Interrogatories [Set One]
3 within thirty (30) days of service as follows:

4 **DEFINITIONS**

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

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

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

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

17 **SPECIAL INTERROGATORIES**

18 **INTERROGATORY NO. 1:**

19 If YOU contend that any property owner had actual notice that your use of groundwater was
20 adverse to their overlying right, please identify each property owner.

21 **INTERROGATORY NO. 2:**

22 If YOU contend that any property owner had actual notice that your use of groundwater was
23 adverse to their overlying right, please state precisely all facts which supports that contention.

24 **INTERROGATORY NO. 3:**

25 If YOU contend that any property owner had actual notice that your use of groundwater was
26 adverse to their overlying right, please describe each WRITING which supports that contention.

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1 INTERROGATORY NO. 4:

2 If YOU contend that any property owner had constructive notice that your use of groundwater
3 was adverse to their overlying right, please identify each property owner.

4 INTERROGATORY NO. 5:

5 If YOU contend that any property owner had constructive notice that your use of groundwater
6 was adverse to their overlying right, please state precisely all facts which supports that contention.

7 INTERROGATORY NO. 6:

8 If YOU contend that any property owner had constructive notice that your use of groundwater
9 was adverse to their overlying right, please describe each WRITING which supports that contention.

10 INTERROGATORY NO. 7:

11 If you contend that YOU have acquired a prescriptive right to use groundwater within the
12 BASIN, when was that prescriptive right acquired?

13 INTERROGATORY NO. 8:

14 If in the last fifteen (15) years you have denied an application for new water service within the
15 BASIN on the basis that the available water supply was inadequate to serve the water supply needs of
16 the applicant, please describe each WRITING which evidences said denial.

17 INTERROGATORY NO. 9:

18 If YOU contend that all groundwater you have pumped from within the BASIN has been put
19 to a reasonable and beneficial use, please describe all uses of that groundwater.

20 Dated: May 25, 2007

LeBEAU • THELEN, LLP

21
22 By: 

23 BOB H. JOYCE
24 Attorneys for DIAMOND FARMING COMPANY,
25 a California corporation
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Exhibit 1

Responding Parties to Diamond Farming Company's Special Interrogatories [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 **SPECIAL INTERROGATORIES [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