

EXHIBIT E

1 DOUGLAS J. EVERTZ, State Bar No. 123066
2 STRADLING YOCCA CARLSON & RAUTH
3 A Professional Corporation
4 660 Newport Center Drive, Suite 1600
5 Newport Beach, California 92660-6441
6 Telephone: (949) 725-4000
7 Fax: (949) 725-4100

Exempt from filing fee
Government Code § 6103

5 Attorneys for Defendant/Cross-Complainant and
6 Cross-Defendant CITY OF LANCASTER

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF LOS ANGELES

10

11 **ANTELOPE VALLEY GROUNDWATER
12 CASES**

13 Included Actions:

14 Los Angeles County Waterworks District
15 No. 40 v. Diamond Farming Co.
16 Superior Court of California
17 County of Los Angeles, Case No. BC 325 201;

18 Los Angeles County Waterworks District
19 No. 40 v. Diamond Farming Co.
20 Superior Court of California, County of Kern,
21 Case No. S-1500-CV-254-348

22 Wm. Bolthouse Farms, Inc. v. City of Lancaster
23 Diamond Farming Co. v. City of Lancaster
24 Diamond Farming Co. v. Palmdale Water Dist.
25 Superior Court of California, County of
26 Riverside, consolidated actions; Case Nos.
27 RIC 353 840, RIC 344 436, RIC 344 668.

Judicial Council Coordination
Proceeding No. 4408

CLASS ACTION

Santa Clara Case No. 1-05-CV 049053
Assigned to The Honorable Jack Komar

**CITY OF LANCASTER'S
OBJECTIONS TO DIAMOND
FARMING COMPANY'S
REQUEST FOR PRODUCTION
OF DOCUMENTS, SET ONE**

22

23

24

25

26 ///

27 ///

28

1 **PROPOUNDING PARTY:** DIAMOND FARMING COMPANY
2 **RESPONDING PARTY:** CITY OF LANCASTER ("CITY")
3 **SET NO.:** ONE
4
5

6 **GENERAL OBJECTIONS**

7
8 A. The City objects to this first set of demand for inspection of documents and
9 things to the extent they intrude into confidential communications covered by the attorney-client
10 privilege and they intrude into confidential material covered by the attorney work-product
11 privilege. This objection applies equally to each and every request served on the City.

12 **OBJECTIONS TO REQUEST FOR PRODUCTION**

13
14 **OBJECTION TO REQUEST NO. 1:**

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
17 process. No class representative has yet been approved by the court.
18

19 **OBJECTION TO REQUEST NO. 2:**

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
22 process. No class representative has yet been approved by the court.
23

24 **OBJECTION TO REQUEST NO. 3:**

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
27 process. No class representative has yet been approved by the court.
28

1 **OBJECTION TO REQUEST NO. 4:**

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
4 process. No class representative has yet been approved by the court.
5

6 **OBJECTION TO REQUEST NO. 5:**

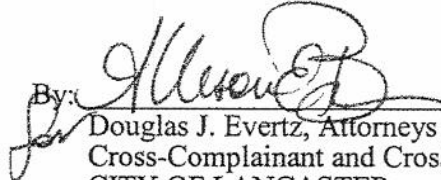
7 Objection. The request is premature, burdensome and oppressive. This request seeks
8 information concerning class members and the court has not yet completed its class certification
9 process. No class representative has yet been approved by the court.
10

11 **OBJECTION TO REQUEST NO. 6:**

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
14 process. No class representative has yet been approved by the court.
15

16 DATED: June 26, 2007

STRADLING YOCCA CARLSON & RAUTH
A Professional Corporation

17
18
19 By: 
20 Douglas J. Evertz, Attorneys for Defendant/
Cross-Complainant and Cross-Defendant
CITY OF LANCASTER
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE

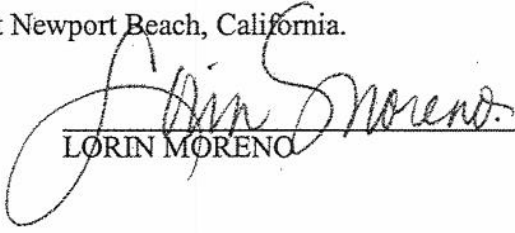
I am a resident of the State of California and over the age of eighteen years, and not a party to the within action; my business address is 660 Newport Center Drive, Suite 1600, Newport Beach, California 92660. On June 26, 2007, I served the within document(s):

CITY OF LANCASTER'S OBJECTIONS TO DIAMOND FARMING COMPANY'S REQUEST FOR PRODUCTION OF DOCUMENTS, SET ONE

- by posting the document(s) list above to the website <http://www.scefiling.org>, a dedicated link to the Antelope Valley Groundwater Cases; Santa Clara Case No. 1-05-CV 049053, Assigned to The Honorable Jack Komar.
- by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m.
- by placing the document(s) listed above in a sealed envelope, fully prepaid, via United States Mail addressed as set forth below.
- by placing the document(s) listed above in a sealed FEDERAL EXPRESS package for overnight delivery at Newport Beach, California addressed as set forth below.

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

Executed on June 26, 2007, at Newport Beach, California.



 LORIN MORENO