

# Exhibit A

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2 Bob H. Joyce, (SBN 84607)  
3 Dave R. Lampe (SBN 77100)  
4 Andrew Sheffield (SBN 220735)

5 LAW OFFICES OF  
6 LeBEAU • THELEN, LLP  
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8 Post Office Box 12092  
9 Bakersfield, California 93389-2092  
10 (661) 325-8962; Fax (661) 325-1127

11 Attorneys for DIAMOND FARMING COMPANY,  
12 a California corporation

13 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
14 IN AND FOR THE COUNTY OF LOS ANGELES

15 Coordination Proceeding Special Title  
16 (Rule 1550 (b))

Judicial Council Coordination No. 4408

17 ANTELOPE VALLEY GROUNDWATER  
18 CASES

Case No.: 1-05-CV-049053

19 Included actions:

**SPECIAL INTERROGATORIES  
[SET ONE]**

20 Los Angeles County Waterworks District No.  
21 40 vs. Diamond Farming Company  
22 Los Angeles Superior Court  
23 Case No. BC 325201

24 Los Angeles County Waterworks District No.  
25 40 vs. Diamond Farming Company  
26 Kern County Superior Court  
27 Case No. S-1500-CV 254348 NFT

28 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.

27 ///

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

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](http://www.scefiling.org); All papers filed in Los Angeles County Superior Court and copy sent to trial judge and Chair of Judicial Council.

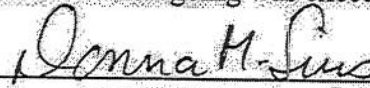
Los Angeles County Superior Court  
111 North Hill Street  
Los Angeles, CA 90012  
Attn: **Department 1**  
(213) 893-1014

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

1 THE SUPERIOR COURT OF CALIFORNIA, COUNTY OF SANTA CLARA  
ELECTRONIC FILING - WWW.SCEFILING.ORG

2 c/o Glotrans  
2915 McClure Street  
Oakland, CA94609  
3 TEL: (510) 208-4775  
FAX: (510) 465-7348  
EMAIL: Info@Glotrans.com

4  
5 THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
IN AND FOR THE COUNTY OF SANTA CLARA

6 Antelope Valley Groundwater Cases (JCCP 4408) )  
7 vs. Plaintiff, )  
8 Defendant. )  
9 AND RELATED ACTIONS )  
PROOF OF SERVICE  
Electronic Proof of Service

10 I am employed in the County of Alameda, State of California.

11 I am over the age of 18 and not a party to the within action; my business address is 2915 McClure  
Street, Oakland, CA 94609.

12 The documents described on page 2 of this Electronic Proof of Service were submitted via the  
worldwide web on Fri. May 25, 2007 at 11:51 AM PDT and served by electronic mail notification.

13 I have reviewed the Court's Order Concerning Electronic Filing and Service of Pleading Documents and  
14 am readily familiar with the contents of said Order. Under the terms of said Order, I certify the above-described  
document's electronic service in the following manner:

15 The document was electronically filed on the Court's website, <http://www.scefilling.org>, on Fri. May 25,  
2007 at 11:51 AM PDT

16 Upon approval of the document by the Court, an electronic mail message was transmitted to all parties  
17 on the electronic service list maintained for this case. The message identified the document and provided  
instructions for accessing the document on the worldwide web.

18 I declare under penalty of perjury under the laws of the State of California that the foregoing is true and  
correct. Executed on May 25, 2007 at Oakland, California.

19 Dated: May 25, 2007

For WWW.SCEFILING.ORG

20 Andy Jamieson  
21  
22  
23

2 Electronic Proof of Service  
Page 2

3 Document(s) submitted by Bob Joyce of LeBeau-Thelen, LLP on Fri. May 25, 2007 at 11:51 AM PDT

4 1. Discovery (e-service only): SPECIAL INTERROGATORIES [SET ONE]

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