

Exhibit B

1 BEST BEST & KRIEGER LLP
ERIC L. GARNER, Bar No. 130665
2 JEFFREY V. DUNN, Bar No. 131926
STEFANIE D. HEDLUND, Bar No. 239787
3 5 PARK PLAZA, SUITE 1500
IRVINE, CALIFORNIA 92614
4 TELEPHONE: (949) 263-2600
TELECOPIER: (949) 260-0972
5 Attorneys for Cross-Complainants
ROSAMOND COMMUNITY SERVICES
6 DISTRICT and LOS ANGELES COUNTY
WATERWORKS DISTRICT NO. 40

EXEMPT FROM FILING FEES
UNDER GOVERNMENT CODE
SECTION 6103

7 OFFICE OF COUNTY COUNSEL
8 COUNTY OF LOS ANGELES
RAYMOND G. FORTNER, JR., Bar No. 42230
9 COUNTY COUNSEL
FREDERICK W. PFAEFFLE, Bar No. 145742
10 PRINCIPAL DEPUTY COUNTY COUNSEL
500 WEST TEMPLE STREET
11 LOS ANGELES, CALIFORNIA 90012
TELEPHONE: (213) 974-1901
12 TELECOPIER: (213) 458-4020
Attorneys for Cross-Complainant LOS ANGELES
13 COUNTY WATERWORKS DISTRICT NO. 40

14
15 SUPERIOR COURT OF THE STATE OF CALIFORNIA
16 COUNTY OF LOS ANGELES – CENTRAL DISTRICT
17

18 **ANTELOPE VALLEY**
19 **GROUNDWATER CASES**

20 Included Actions:

21 Los Angeles County Waterworks District
No. 40 v. Diamond Farming Co., Superior
Court of California, County of Los
Angeles, Case No. BC 325201;

22 Los Angeles County Waterworks District
23 No. 40 v. Diamond Farming Co., Superior
Court of California, County of Kern, Case
24 No. S-1500-CV-254-348;

25 Wm. Bolthouse Farms, Inc. v. City of
Lancaster, Diamond Farming Co. v. City of
26 Lancaster, Diamond Farming Co. v.
Palmdale Water Dist., Superior Court of
27 California, County of Riverside, Case Nos.
RIC 353 840, RIC 344 436, RIC 344 668
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Judicial Council Coordination No. 4408

CLASS ACTION

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

LOS ANGELES COUNTY
WATERWORKS DISTRICT NO. 40'S
OBJECTIONS TO REQUEST FOR
PRODUCTION OF DOCUMENTS, SET
ONE

1 PROPOUNDING PARTY: Diamond Farming Company
2 RESPONDING PARTY: Los Angeles County Waterworks District No. 40
3 SET NUMBER: One (1)
4

5
6 OBJECTION TO REQUEST NO. 1:

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. 2:

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 OBJECTION TO REQUEST NO. 3:

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

20
21 OBJECTION TO REQUEST NO. 4:

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

25
26 OBJECTION TO REQUEST NO. 5:

27 Objection. The request is premature, burdensome and oppressive. This request seeks
28 information concerning class members and the court has not yet completed its class certification

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

2

3 OBJECTION TO REQUEST NO. 6:

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

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Dated: June 26, 2007

BEST BEST & KRIEGER LLP

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By 

ERIC L. GARNER
JEFFREY V. DUNN
STEFANIE D. HEDLUND
Attorneys for Cross-Complainants
ROSAMOND COMMUNITY SERVICES
DISTRICT and LOS ANGELES
COUNTY WATERWORKS DISTRICT
NO. 40

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LAW OFFICES OF
BEST BEST & KRIEGER LLP
5 PARK PLAZA, SUITE 1500
IRVINE, CALIFORNIA 92614

LAW OFFICES OF
BESTBEST & KRIEGER LLP
5 PARK PLAZA, SUITE 1500
IRVINE, CALIFORNIA 92614

PROOF OF SERVICE

I, Kerry V. Keefe, declare:

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 Best Best & Krieger LLP, 5 Park Plaza, Suite 1500, Irvine, California 92614. On June 26, 2007, I served the within document(s):

LOS ANGELES COUNTY WATERWORKS DISTRICT NO. 40'S OBJECTIONS TO REQUEST FOR PRODUCTION OF DOCUMENTS, SET ONE

- by posting the document(s) listed above to the Santa Clara County Superior Court website in regard to the Antelope Valley Groundwater matter.
- by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Irvine, California addressed as set forth below.
- by causing personal delivery by ASAP Corporate Services of the document(s) listed above to the person(s) at the address(es) set forth below.
- by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.
- I caused such envelope to be delivered via overnight delivery addressed as indicated on the attached service list. Such envelope was deposited for delivery by Federal Express following the firm's ordinary business practices.

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 in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

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 Irvine, California.


Kerry V. Keefe

Jun 26, 2007 3:56 PM

KIRI TORRE

Chief Executive Officer

Superior Court of CA, County of Santa Clara

Case #1-05-CV-049053 Filing #G-3795

By SC E-Filing Administrator, Deputy

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

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

Antelope Valley Groundwater Cases (JCCP 4408)

Antelope Valley Groundwater Cases

Plaintiff,

Lead Case No.1-05-CV-049053

vs.

Judge Jack Komar

Defendant.

PROOF OF SERVICE

Electronic Proof of Service

AND RELATED ACTIONS

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

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.

The documents described on page 2 of this Electronic Proof of Service were submitted via the worldwide web on Tue. June 26, 2007 at 3:56 PM PDT and served by electronic mail notification.

I have reviewed the Court's Order Concerning Electronic Filing and Service of Pleading Documents and 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:

The document was electronically filed on the Court's website, <http://www.scefiling.org>, on Tue. June 26, 2007 at 3:56 PM PDT

Upon approval of the document by the Court, an electronic mail message was transmitted to all parties 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.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on June 26, 2007 at Oakland, California.

Dated: June 26, 2007

For WWW.SCEFILING.ORG

Andy Jamieson

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

2 Electronic Proof of Service
Page 2

3 Document(s) submitted by Jeffrey Dunn of Best Best & Krieger LLP on Tue. June 26, 2007 at 3:56 PM PDT

4 1. Other: Los Angeles County Waterworks District No. 40's Objections to Request For Production of Documents, Set One
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