

# Exhibit C

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DISTRICT and LOS ANGELES COUNTY  
WATERWORKS DISTRICT NO. 40

EXEMPT FROM FILING FEES  
UNDER GOVERNMENT CODE  
SECTION 6103

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COUNTY WATERWORKS DISTRICT NO. 40

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES – CENTRAL DISTRICT

**ANTELOPE VALLEY  
GROUNDWATER CASES**  
  
Included Actions:  
Los Angeles County Waterworks District  
No. 40 v. Diamond Farming Co., Superior  
Court of California, County of Los  
Angeles, Case No. BC 325201;  
  
Los Angeles County Waterworks District  
No. 40 v. Diamond Farming Co., Superior  
Court of California, County of Kern, Case  
No. S-1500-CV-254-348;  
  
Wm. Bolthouse Farms, Inc. v. City of  
Lancaster, Diamond Farming Co. v. City of  
Lancaster, Diamond Farming Co. v.  
Palmdale Water Dist., Superior Court of  
California, County of Riverside, Case Nos.  
RIC 353 840, RIC 344 436, RIC 344 668.

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 REQUESTS FOR  
ADMISSIONS, SET ONE**

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

4 OBJECTION TO REQUEST NO. 1:

5 Objection. This request is not reasonably calculated to lead to the discovery of admissible  
6 evidence. The request is manifestly irrelevant and calculated to harass.

7  
8 OBJECTION TO REQUEST NO. 2:

9 Los Angeles County Waterworks District No. 40 admits that it is a public entity.

10  
11 OBJECTION TO REQUEST NO. 3:

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. 4:

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. 5:

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. 6:

27 Objection. The request is premature, burdensome and oppressive. This request seeks  
28

1 information concerning class members and the court has not yet completed its class certification  
2 process. No class representative has yet been approved by the court.

3  
4 OBJECTION TO REQUEST NO. 7:

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

8  
9 OBJECTION TO REQUEST NO. 8:

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

13  
14 OBJECTION TO REQUEST NO. 9:

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. 10:

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. 11:

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. 12:

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. 13:

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. 14:

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. 15:

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. 16:

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. 17:

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. 18:

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.

7

8 OBJECTION TO REQUEST NO. 19:

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

12

13 OBJECTION TO REQUEST NO. 20:

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

17

18 OBJECTION TO REQUEST NO. 21:

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

22

23 OBJECTION TO REQUEST NO. 22:

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

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1 OBJECTION TO REQUEST NO. 23:

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. 24:

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. 25:

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. 26:

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. 27:

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. 28:

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.

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3 OBJECTION TO REQUEST NO. 29:

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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8 OBJECTION TO REQUEST NO. 30:

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

12

13 OBJECTION TO REQUEST NO. 31:

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

17

18 OBJECTION TO REQUEST NO. 32:

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

22

23 OBJECTION TO REQUEST NO. 33:

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

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1 OBJECTION TO REQUEST NO. 34:

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. 35:

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. 36:

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. 37:

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.

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21 OBJECTION TO REQUEST NO. 38:

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.

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26 OBJECTION TO REQUEST NO. 39:

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. 40:

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.

7

8 OBJECTION TO REQUEST NO. 41:

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

12

13 OBJECTION TO REQUEST NO. 42:

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

17

18 OBJECTION TO REQUEST NO. 43:

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

22

23 OBJECTION TO REQUEST NO. 44:

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

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1 OBJECTION TO REQUEST NO. 45:

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. 46:

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. 47:

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. 48:

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. 49:

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. 50:

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. 51:

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.

7

8 OBJECTION TO REQUEST NO. 52:

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

12

13 OBJECTION TO REQUEST NO. 53:

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

17

18 OBJECTION TO REQUEST NO. 54:

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

22

23 OBJECTION TO REQUEST NO. 55:

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

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1 OBJECTION TO REQUEST NO. 56:

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. 57:

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. 58:

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. 59:

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.

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OBJECTION TO REQUEST NO. 60:

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

Dated: June 26, 2007

BEST BEST & KRIEGER LLP

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

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):

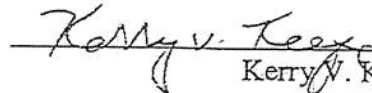
**LOS ANGELES COUNTY WATERWORKS DISTRICT NO. 40'S OBJECTIONS TO REQUESTS FOR ADMISSIONS, SET ONE**

- 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



1 THE SUPERIOR COURT OF CALIFORNIA, COUNTY OF SANTA CLARA  
ELECTRONIC FILING - WWW.SCEFILING.ORG  
c/o Glotrans  
2915 McClure Street  
Oakland, CA94609  
2 TEL: (510) 208-4775  
FAX: (510) 465-7348  
3 EMAIL: Info@Glotrans.com

**E-FILED**  
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

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) ) Antelope Valley Groundwater Cases  
7 Plaintiff, )  
vs. ) Lead Case No.1-05-CV-049053  
8 Defendant. ) Judge Jack Komar  
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 Tue. June 26, 2007 at 3:56 PM PDT and served by electronic mail notification.

13 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:

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

16 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.

18 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.

19 Dated: June 26, 2007

For WWW.SCEFILING.ORG

20 Andy Jamieson

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22  
23



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 Requests For Admissions, Set One  
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