

Exhibit D

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

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

EXEMPT FROM FILING FEES
UNDER GOVERNMENT CODE
SECTION 6103

OFFICE OF COUNTY COUNSEL
COUNTY OF LOS ANGELES
RAYMOND G. FORTNER, JR., Bar No. 42230
COUNTY COUNSEL
FREDERICK W. PFAEFFLE, Bar No. 145742
PRINCIPAL DEPUTY COUNTY COUNSEL
500 WEST TEMPLE STREET
LOS ANGELES, CALIFORNIA 90012
TELEPHONE: (213) 974-1901
TELECOPIER: (213) 458-4020
Attorneys for Cross-Complainant LOS ANGELES
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

**ROSAMOND COMMUNITY SERVICES
DISTRICT'S OBJECTIONS TO
REQUESTS FOR ADMISSIONS, SET ONE**

1 PROPOUNDING PARTY: Diamond Farming Company
2 RESPONDING PARTY: Rosamond Community Services District
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.

8 OBJECTION TO REQUEST NO. 2:

9 Rosamond Community Services District admits that it is a public entity.

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.

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.

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.

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.

27

28

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.

2

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.

7

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.

27

28

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.

20
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.

25
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.
27
28

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.

27

28

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.

20 //

21

22 //

23

24 //

25

26 //

27

28 //

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

1 OBJECTION TO REQUEST NO. 60:

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
7
8 Dated: June 26, 2007

BEST BEST & KRIEGER LLP

9
10 By 

11 ERIC L. GARNER
12 JEFFREY V. DUNN
13 STEFANIE D. HEDLUND
14 Attorneys for Cross-Complainants
15 ROSAMOND COMMUNITY SERVICES
16 DISTRICT and LOS ANGELES
17 COUNTY WATERWORKS DISTRICT
18 NO. 40
19
20
21
22
23
24
25

26 ORANGE\37317.1
27
28

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

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, 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):

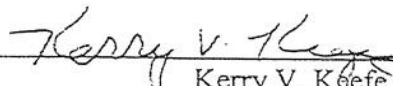
ROSAMOND COMMUNITY SERVICES DISTRICT'S OBJECTIONS TO REQUESTS FOR ADMISSIONS, SET ONE

- 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

2 c/o Glotrans
2915 McClure Street
Oakland, CA94609
3 TEL: (510) 208-4775
FAX: (510) 465-7348
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
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.scefiling.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
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 June 26, 2007 at Oakland, California.

19 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: Rosamond Community Services District's Objections to Requests For Admissions, Set One
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23