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8 Attorneys for GRIMMWAY ENTERPRISES, INC.

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

11 Coordinated Proceeding,  
12 Special Title (Rule 1550(b)),

13 ANTELOPE VALLEY GROUNDWATER  
14 CASES.

Judicial Council Coordination  
Proceeding No.: 4408  
LASC Case No. BC32501

Santa Clara Superior Court  
Case No.: 1-05-CV-049053

**GRIMMWAY ENTERPRISES, INC.’S  
RESPONSES TO JOHNNY ZAMRZLA,  
PAMELLA ZAMRZLA, JOHNNY LEE  
ZAMRZLA AND JEANETTE  
ZAMRZLAS’ REQUESTS FOR  
ADMISSION – SET ONE**

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19 PROPOUNDING PARTY: Plaintiff, JOHNNY ZAMRZLA, PAMELLA ZAMRZLA,  
20 JOHNNY LEE ZAMRZLA AND JEANETTE ZAMRZLA  
21 RESPONDING PARTY: Defendant, GRIMMWAY ENTERPRISES, INC.  
22 SET NO.: ONE

23 **I. INTRODUCTION**

24 Plaintiffs JOHNNY ZAMRZLA, PAMELLA ZAMRZLA, JOHNNY LEE ZAMRZLA  
25 and JEANETTE ZAMRZLA (**Propounding Parties**) served Requests for Admission, Set One  
26 (**Request**) by electronic mail on defendant GRIMMWAY ENTERPRISES, INC. (**Responding**  
27 **Party**) on May 25, 2022. This is Responding Party’s responses and objections to the Request.

1 **II. DEFINITIONS**

2 The following words and phrases, in addition to the words and phrases defined in Part I,  
3 shall govern the construction of these responses and objections unless the context otherwise  
4 requires:

5 1. "Ground 1" means that the information sought is neither admissible in evidence  
6 nor reasonably calculated to lead to the discovery of admissible evidence. (Code Civ. Proc., §  
7 2017.010.)

8 2. "Ground 2" means that the request is not timely under Code of Civil Procedure  
9 section 2024.020.

10 3. "Ground 3" means that the request contains a preface or instruction not approved  
11 under Chapter 17 of the Civil Discovery Act. (Code Civ. Proc., § 2033.060, subd. (d).)

12 4. "Ground 4" means that the request is not full and complete in and of itself. (Code  
13 Civ. Proc., § 2033.060, subd. (d).)

14 5. "Ground 5" means that the request includes a capitalized term but does not  
15 include a definition of that term in the request. (Code Civ. Proc., § 2033.060, subd. (e).)

16 6. "Ground 6" means that the request contains subparts, or a compound, conjunctive,  
17 or disjunctive request. (Code Civ. Proc., § 2033.060, subd. (f).)

18 7. "Ground 7" means that the request exceeds the statutorily permitted limit. (Code  
19 Civ. Proc., § 2033.030, subd. (a).)

20 8. "Ground 8" means that the request is unduly annoying, embarrassing, oppressive,  
21 harassing, burdensome, and expensive. (Code Civ. Proc., § 2033.030, subd. (c).)

22 9. "Ground 9" means that the request is vague, ambiguous, and unintelligible.

23 10. "Ground 10" means that the information sought comes within the lawyer-client  
24 privilege. (Code Civ. Proc., § 2033.230, subd. (b).)

25 11. "Ground 11" means that the information sought is protected work product under  
26 Code of Civil Procedure section 2018.030. (Code Civ. Proc., § 2033.230, subd. (b).)

1 12. "Ground 12" means that the request is made in bad faith for an improper purpose.  
2 Propounding Party seeks to have Responding Party admit as fact that which Propounding Party  
3 has no reasonable basis to believe is true.

### 4 III. GENERAL OBJECTIONS

5 Responding Party has not fully completed investigation of the facts relating to this case,  
6 has not completed discovery concerning this case, and has not completed trial preparation. The  
7 responses disclose only those contentions which presently occur to Responding Party. It is  
8 anticipated that further discovery, investigation, legal research, and analysis will supply  
9 additional facts, add meaning to the known facts, as well as establish entirely new factual  
10 contentions and legal contentions. Therefore, the following responses are given without  
11 prejudice to Responding Party's right to produce evidence of any subsequently discovered fact  
12 which Responding Party may later recall.

### 13 IV. RESPONSES

14 Without waiving the general objections contained in Part III or the specific objections  
15 contained in this part, Responding Party responds as follows:

#### 16 **RESPONSE TO REQUEST FOR ADMISSION NO. 1:**

17 Objection on Ground 1. Without waiving the objection, the Responding Party admits  
18 that it leased land from Johnny Zamrzla.

#### 19 **RESPONSE TO REQUEST FOR ADMISSION NO. 2:**

20 Objection on Ground 1. Without waiving the objection, the Responding Party admits  
21 that it leased a portion of APN 3220-006-22 and 322-006-003 from Johnny Zamrzla.

#### 22 **RESPONSE TO REQUEST FOR ADMISSION NO. 3:**

23 Objection on Grounds 1 and 9. Without waiving the objections, the Responding Party  
24 admits that it leased land from Johnny Zamrzla for agricultural purposes.

#### 25 **RESPONSE TO REQUEST FOR ADMISSION NO. 4:**

26 Objection on Ground 8. Asked and answered.

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1 **RESPONSE TO REQUEST FOR ADMISSION NO. 5:**

2           Objection on Grounds 1 and 9. Without waiving such objections, the Responding Party  
3 admits that it used water from a well leased from Johnny Zamrzla.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 6:**

5           Objection on Grounds 1 and 9. Without waiving such objections, the Responding Party  
6 admits that it used water from a well leased from Johnny Zamrzla for agricultural purposes.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 7:**

8           Objection on Grounds 1 and 9. Without waiving the objections, denied as framed.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 8:**

10           Objection on Grounds 1 and 9. Without waiving such objections, denied.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 9:**

12           Objection on Ground 9. Without waiving such objection, the Responding Party has only  
13 just commenced discovery and lacks sufficient information to admit or deny, and therefore  
14 denies such request.

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 10:**

16           Objection on Ground 9. Without waiving such objection, the Responding Party has only  
17 just commenced discovery and lacks sufficient information to admit or deny, and therefore  
18 denies such request.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 11:**

20           Objection on Ground 9. Without waiving such objection, the Responding Party has only  
21 just commenced discovery and lacks sufficient information to admit or deny, and therefore  
22 denies such request.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 12:**

24           Objection on Ground 9. Without waiving such objection, the Responding Party has only  
25 just commenced discovery and lacks sufficient information to admit or deny, and therefore  
26 denies such request.

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1 **RESPONSE TO REQUEST FOR ADMISSION NO. 13:**

2           Objection on Ground 9. Without waiving such objection, the Responding Party has only  
3 just commenced discovery and lacks sufficient information to admit or deny, and therefore  
4 denies such request.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 14:**

6           Objection on Ground 9. Without waiving such objection, the Responding Party has only  
7 just commenced discovery and lacks sufficient information to admit or deny, and therefore  
8 denies such request.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 15:**

10           Objection on Ground 9. Without waiving such objection, the Responding Party has only  
11 just commenced discovery and lacks sufficient information to admit or deny, and therefore  
12 denies such request.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 16:**

14           Objection on Ground 9. Without waiving such objection, the Responding Party has only  
15 just commenced discovery and lacks sufficient information to admit or deny, and therefore  
16 denies such request.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 17:**

18           Objection on Ground 9. Without waiving such objection, the Responding Party has only  
19 just commenced discovery and lacks sufficient information to admit or deny, and therefore  
20 denies such request.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 18:**

22           Objection on Ground 9. Without waiving such objection, the Responding Party has only  
23 just commenced discovery and lacks sufficient information to admit or deny, and therefore  
24 denies such request.

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**RESPONSE TO REQUEST FOR ADMISSION NO. 19:**

Objection on Ground 9. Without waiving such objection, the Responding Party has only just commenced discovery and lacks sufficient information to admit or deny, and therefore denies such request.

Dated: June 16, 2022

LeBEAU THELEN, LLP

By:   
Robert G. Kuhs, Esq.  
GRIMMWAY ENTERPRISES, INC.

VERIFICATION TO FOLLOW

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**PROOF OF SERVICE**

STATE OF CALIFORNIA )  
  )    SS  
COUNTY OF KERN        )

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen (18) years and not a party to the within-entitled action. My business address is 5001 E. Commercenter Drive, Suite 300, Bakersfield, California 93309. On **June 16, 2022**, I served the within document(s):

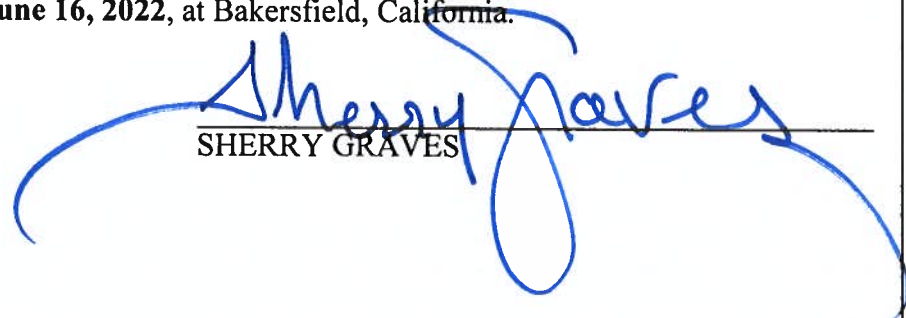
**GRIMMWAY ENTERPRISES RESPONSES TO JOHNNY ZAMRZLA, PAMELLA ZAMRZLA, JOHNNY LEE ZAMRZLA AND JEANETTE ZAMRZLAS' REQUESTS FOR ADMISSION – SET ONE**

**BY ELECTRONIC SERVICE:** I caused said document(s) to be transmitted to the email address(es) of the addressee(s) designated by posting the document(s) listed above to the Antelope Valley Groundwater Cases to all parties listed on the Santa Clara Superior Court Service List as maintained via Glotrans. Electronic service completed through <http://www.avwatermaster.org>.

**BY OVERNIGHT COURIER:** By causing the document(s) listed above to be picked up by an overnight courier service company for delivery to the address(es) listed below on the next business day.

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

Executed on **June 16, 2022**, at Bakersfield, California.

  
\_\_\_\_\_  
SHERRY GRAVES