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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
RESPONSE TO JOHNNY ZAMRZLA,
PAMELLA ZAMRZLA, JOHNNY LEE
ZAMRZLA AND JEANETTE
ZAMRZLAS' FORM
INTERROGATORIES - GENERAL –
SET ONE**

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

24 **I. INTRODUCTION**

25 Plaintiffs JOHNNY ZAMRZLA, PAMELLA ZAMRZLA, JOHNNY LEE ZAMRZLA
26 and JEANETTE ZAMRZLA (**Propounding Parties**) served Form Interrogatories - General, Set
27 One (**Request**) by electronic mail on defendant GRIMMWAY ENTERPRISES, INC.

1 (Responding Party) on May 25, 2022. This is Responding Party's responses and objections to
2 the Request.

3 II. DEFINITIONS

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

7 1. "Ground 1" means that the matter sought is neither admissible in evidence nor
8 reasonably calculated to lead to the discovery of admissible evidence. (Code Civ. Proc., §
9 2017.010.)

10 2. "Ground 2" means that the Interrogatories are not timely. (Code Civ. Proc., §
11 2024.020.)

12 3. "Ground 3" means that the Interrogatories contain a preface or instruction not
13 approved under Chapter 17 of the Civil Discovery Act. (Code Civ. Proc., § 2030.060, subd. (d).)

14 4. "Ground 4" means that the Interrogatory is not full and complete in and of itself.
15 (Code Civ. Proc. § 2030.060, subd. (d).)

16 5. "Ground 5" means that the Interrogatory contains subparts, or a compound,
17 conjunctive, or disjunctive question. (Code Civ. Proc., § 2030.060, subd. (f).)

18 6. "Ground 6" means that the information sought is equally available to
19 Propounding Party. (Code Civ. Proc., § 2030.220, subd. (c).)

20 7. "Ground 7" means that the information sought would necessitate the preparation
21 or the making of a compilation, abstract, audit, or summary of or from the documents of
22 Responding party and the burden or expense of preparing or making it would be substantially the
23 same for Propounding Party as for Responding Party. (Code Civ. Proc., § 2030.230.)

24 8. "Ground 8" means that the information sought comes within the lawyer-client
25 privilege. (Code Civ. Proc., § 2030.240, subd. (b).)

26 9. "Ground 9" means that the information sought is protected work-product under
27 Code of Civil Procedure section 2018.030. (Code Civ. Proc., § 2030.240, subd. (b).)

28 10. "Ground 10" means that the Interrogatory is vague, ambiguous, and unintelligible.

1 11. "Ground 11" means that the Interrogatory is oppressive, harassing, and
2 burdensome.

3 12. "Ground 12" means that the Interrogatory is overbroad.

4 13. "Ground 13" means that the Interrogatory seeks confidential or trade secret
5 information.

6 14. "Ground 14" means that the information is protected by the right of privacy.

7 15. "Ground 15" means that the Interrogatory seeks matter protected from premature
8 disclosure by Code of Civil Procedure section 2034.210, et seq.

9 16. "Ground 16" means that the excessive use of definitions and instructions makes
10 the Interrogatory vague, ambiguous, and unintelligible, unduly burdensome, and oppressive. (See
11 e.g., *Calcor Space Facility v. Superior Court* (1997) 53 Cal.App.4th 216.)

12 III. GENERAL OBJECTIONS

13 Responding Party has not fully completed the investigation of the facts relating to this
14 case, has not completed discovery concerning this case, and has not completed trial preparation.
15 The answers herein disclose only those contentions which presently occur to Responding Party.
16 It is anticipated that further discovery, investigation, legal research and analysis will supply
17 additional facts, add meaning to the known facts, as well as establish new factual contentions and
18 legal contentions. The following responses are given without prejudice to Responding Party's
19 right to produce evidence of any subsequently discovered fact or facts that Responding Party
20 may later recall.

21 IV. RESPONSES

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

24 **RESPONSE TO FORM INTERROGATORY NO. 3.1:**

25 Objection on Grounds 1 and 11.

26 **RESPONSE TO FORM INTERROGATORY NO. 3.2:**

27 Objection on Grounds 1 and 11.

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1 **RESPONSE TO FORM INTERROGATORY NO. 3.3:**

2 Objection on Grounds 1 and 11.

3 **RESPONSE TO FORM INTERROGATORY NO. 3.4:**

4 Objection on Grounds 1 and 11.

5 **RESPONSE TO FORM INTERROGATORY NO. 3.5:**

6 Objection on Grounds 1 and 11.

7 **RESPONSE TO FORM INTERROGATORY NO. 3.6:**

8 Objection on Grounds 1 and 11.

9 **RESPONSE TO FORM INTERROGATORY NO. 3.7:**

10 Objection on Grounds 1 and 11.

11 **RESPONSE TO FORM INTERROGATORY NO. 17.1:**

12 Objection on Grounds 1, and 11. The Responding Party incorporates by reference each
13 and every objection to the Request for Admissions. Without waiving such objections, the
14 Responding Party responds as follows:

15 Request Nos. 1-8 (a-d). The Responding Party leased a well from Johnny Zamrzla for
16 use during year 2008 to grow crops on adjacent land, and leased a portion of APNs 3220-006-
17 002 and 3220-006-003 for use during the 2006 year, as described in the agreements. The
18 Responding Party did not meter its well production and has not attempted to calculate estimate
19 water use through power records, but assumes that Responding Party's water use in 2006 and
20 2008 exceeded 25 acre-feet.

21 Request Nos. 9-19 (a-d). The Responding Party lack sufficient information and belief to
22 admit or deny.

23 Dated: June 16, 2022

LeBEAU THELEN, LLP

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25 By: 

Robert G. Kuhs

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):

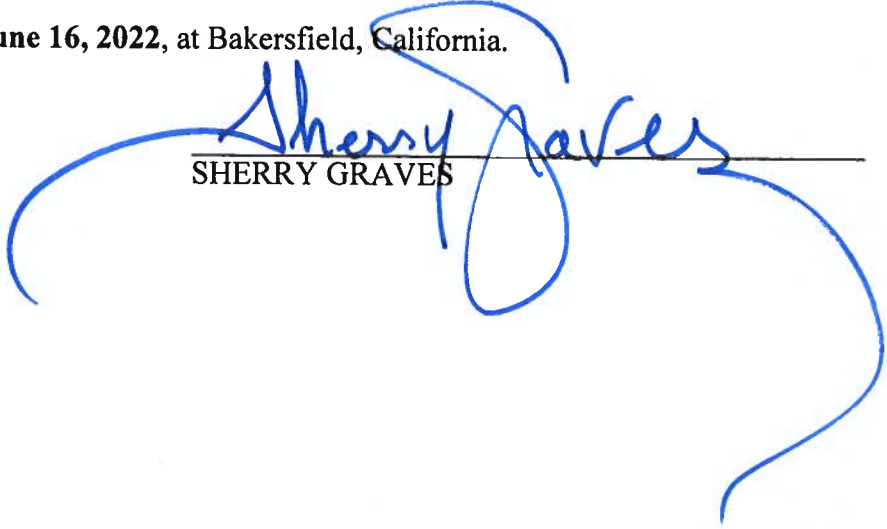
GRIMMWAY ENTERPRISES, INC.'S RESPONSE TO JOHNNY ZAMRZLA, PAMELLA ZAMRZLA, JOHNNY LEE ZAMRZLA AND JEANETTE ZAMRZLAS' FORM INTERROGATORIES - GENERAL - SET ONE

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