

1 WM. MATTHEW DITZHAZY  
City Attorney  
2 City of Palmdale

3 RICHARDS, WATSON & GERSHON  
A Professional Corporation  
4 JAMES L. MARKMAN (43536) (jmarkman@rwglaw.com)  
STEVEN R. ORR (136615) (sorr@rwglaw.com)  
5 WHITNEY G. MCDONALD (245587) (wmcdonald@rwglaw.com)  
355 South Grand Avenue, 40th Floor  
6 Los Angeles, CA 90071-3101  
Telephone: (213) 626-8484  
7 Facsimile: (213) 626-0078

8 Attorneys for Defendant, Cross-Complainant,  
and Cross-Defendant CITY OF PALMDALE  
9

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

11 **COUNTY OF SANTA CLARA**

12 **ANTELOPE VALLEY GROUNDWATER  
13 CASES**

14 Included Actions:

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

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

19 Wm. Bolthouse Farms, Inc. v. City of  
20 Lancaster

21 Diamond Farming Co. v. City of Lancaster

22 Diamond Farming Co. v. Palmdale Water  
23 District

24 Superior Court of California, County of  
Riverside, consolidated actions, Case Nos.  
25 RIC 353840, RIC 344436, RIC 344668

Judicial Council Coordination  
Proceeding No. 4408

**VERIFICATION TO THE CITY OF  
PAMLDALÉ'S RESPONSE TO  
REBECCA LEE WILLIS'  
REQUESTS FOR ADMISSION (SET  
NO. ONE)**

Phase 2 Trial: October 6, 2008  
(Hon. Jack Komar)

[Exempt from Filing Fees Pursuant to Govt. Code  
§6103]

**VERIFICATION**

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I, the undersigned, say:

I have read the foregoing **RESPONSE TO REQUESTS FOR ADMISSION (SET NO. ONE)** and know its contents.

(X) CHECK APPLICABLE PARAGRAPH

- ( ) I am a party to this action. The matters stated in it are true of my own knowledge.
- (X) I am (X) the Director of Public Works ( ) a partner ( ) an employee of the City of Palmdale, a party to this action, and am authorized to make this verification for that reason. I am informed and believe and on that ground allege that the matters stated in it are true.
- ( ) I am one of the attorneys for a party to this action. Such party is absent from the county of aforesaid where such attorneys have their offices, and I make this verification for and on behalf of that party for that reason. I am informed and believe and on that ground allege that the matters stated in it are true.

Executed on July 15, 2008, at Palmdale, California.

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



\_\_\_\_\_  
Michael J. Mischel

1 **PROOF OF SERVICE**

2 I, Kelley Herrington, declare:

3 I am a resident of the State of California and over the age of eighteen years, and  
4 not a party to the within action; my business address is Richards, Watson & Gershon, 355 South  
5 Grand Avenue, 40<sup>th</sup> Floor, Los Angeles, California 90071. On August 6, 2008, I served the  
6 within documents:

7 **VERIFICATION TO THE CITY OF PALMDALE'S RESPONSE TO**  
8 **REBECCA LEE WILLIS' REQUESTS FOR ADMISSION (SET NO. ONE)**

- 9  by causing facsimile transmission of the document(s) listed above from (213) 626-  
10 0078 to the person(s) and facsimile number(s) set forth below on this date before  
11 5:00 P.M. This transmission was reported as complete and without error. A copy  
12 of the transmission report(s), which was properly issued by the transmitting  
13 facsimile machine, is attached. Service by facsimile has been made pursuant to a  
14 prior written agreement between the parties.
- 15  by posting the document(s) listed above to the Santa Clara County Superior Court  
16 website in regard to the Antelope Valley Groundwater matter.
- 17  by placing the document(s) listed above in a sealed envelope and affixing a pre-  
18 paid air bill, and causing the envelope to be delivered to an agent for delivery, or  
19 deposited in a box or other facility regularly maintained by , in an envelope or  
20 package designated by the express service carrier, with delivery fees paid or  
21 provided for, addressed to the person(s) at the address(es) set forth below.
- 22  by personally delivering the document(s) listed above to the person(s) at the  
23 address(es) set forth below.
- 24  by causing personal delivery by First Legal Support Services, 1511 West Beverly  
25 Boulevard, Los Angeles, California 90026 of the document(s) listed above to the  
26 person(s) at the address(es) set forth below.

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

Executed on August 6, 2008.

  
\_\_\_\_\_  
Kelley Herrington