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**VIA ELECTRONIC POSTING**

Robert Joyce , Esq.  
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Bakersfield, CA 93309

Wayne K. Lemieux, Esq.  
Lemieux & O'Neill  
2393 Townsgate Road, Suite 201  
Westlake Village, CA 91361

Re: Antelope Valley Groundwater Adjudication Discovery Meeting, January 27, 2009

Dear Sirs:

I have read Mr. Joyce's letter to Mr. Lemieux dated January 21, 2009. It was my understanding of the Court's direction to the parties that they meet to consider a discovery plan, including, potentially, uniform interrogatories. The goal, as I understood it, was to cut down on excessive and duplicative discovery requests, to discuss and propose a document repository arrangement acceptable to all parties (to the extent possible). Because the Court suggested strongly that the meeting to discuss these broad issues be face-to-face, I will be flying down from Sacramento for the sole purpose of attending the meeting.

It was not my understanding that the meeting suggested by the Court was for the purpose of resolving individual discovery disputes, such as is proposed in Mr. Joyce's letter. Furthermore, unlike discussion of the broader discovery planning and coordination, resolution of such specific disputes need not involve the full complement of counsel in the case.

Therefore, it is my request that any discussion aimed at resolving individual discovery disputes trail discussion of the broader discovery issues that affect all attorneys. This will allow meet-and-confer discussions concerning the discovery already propounded, while still allowing out-of-town attorneys to catch their air transportation.

Thank you very much for your consideration.

Sincerely,



Janet K. Goldsmith  
Attorney for City of Los Angeles

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