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7 Johnny Lee Zamrzla and Jeanette Zamrzla (collectively  
8 "Zamrzla's")

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

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

14 ANTELOPE VALLEY  
15 GROUNDWATER CASES.

Judicial Council Coordination  
Proceeding No. 4408

LASC Case No. BC 32501

Santa Clara Court Case No. 1-05-CV-049053  
Assigned to the Hon. Jack Komar, Judge of the  
Santa Clara County Superior Court

**EVIDENTIARY OBJECTIONS TO THE  
DECLARATION OF JEFFREY V. DUNN  
SUBMITTED IN SUPPORT OF THE  
WATERMASTER'S REPLY TO  
ZAMRZLAS' OPPOSITION TO MOTION  
FOR MONETARY, DECLARATORY AND  
INJUNCTIVE RELIEF**

Date: December 10, 2021

Time: 9:00 a.m.

Dept.: By Zoom

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25 COMES NOW the Zamrzla's, individually and jointly, and submit their Evidentiary  
26 Objections to the Declaration of Jeffrey V. Dunn Submitted in Support of Watermaster's Reply  
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1 to Zamrzlas' Opposition to Motion for Monetary, Declaratory, and Injunctive Relief ("Dunn  
2 Declaration"), as follows:

3 1. Paragraph 5 of the Dunn Declaration states, in pertinent part, that:

4 "On July 2, 2009, my office received the mailing list used by the vendor to provide  
5 the 2009 Notice, which lists Johnny Zamrzla's and Pamela Zamrzla's ("Zamrzla")  
6 mailing address as "48910 80TH ST W, LANCASTER, CA 93536-8740." I am  
7 informed and therefore believe that a copy of the 2009 Notice was mailed to  
8 Zamrzla in late June or early July 2009 at that address."

9 2. Zamrzla's object to the sentence that states "I am informed and therefore believe  
10 that a copy of the 2009 Notice was mailed to Zamrzla in late June or early July 2009 at that  
11 address" on the grounds that:

12 a. The statement is hearsay as the same is defined in Evidence Code §1200. Mr.  
13 Dunn has no personal knowledge that the 2009 Notice was mailed to anyone  
14 (including the Zamrzlas) and the statement, offered for the truth of the matter, is  
15 therefore inadmissible under the hearsay rule.

16 b. In addition, the statement has no basis or foundation and therefore the declarant  
17 lacks personal knowledge to make the statement that the 2009 notice was mailed  
18 to anyone (including the Zamrzlas). See, Evidence Code §702.

19 WHEREFORE, the Zamrzlas' request that the objections contained herein be sustained.

20 Dated: December 6, 2021

LAW OFFICES OF ROBERT H. BRUMFIELD  
A Professional Corporation

21 By: \_\_\_\_\_  
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23 Robert H. Brumfield, III  
24 Attorney for Johnny Zamrzla, Pamela  
25 Zamrzla, Johnny Lee Zamrzla and  
26 Jeanette Zamrzla  
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**PROOF OF SERVICE (C.C.P. §1013a, 2015.5)**

I am employed in the County of Kern, State of California. I am over the age of 18 and not a party to the within action; my business address is 1810 Westwind Drive, Bakersfield, CA 93301.

On December 6, 2021, I served the foregoing document(s) entitled:

**EVIDENTIARY OBJECTIONS TO THE DECLARATION OF JEFFREY V. DUNN  
SUBMITTED IN SUPPORT OF THE WATERMASTER'S REPLY TO ZAMRZLAS'  
OPPOSITION TO MOTION FOR MONETARY, DECLARATORY AND  
INJUNCTIVE RELIEF**

X by placing    the original, X a true copy thereof on all interested parties.

X **BY ELECTRONIC MAIL**

I posted the document(s) listed above to the Santa Clara Superior Court Website @ [www.scefiling.org](http://www.scefiling.org) and Glotrans website in the action of the Antelope Valley Groundwater Cases.

X (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on December 6, 2021, at Bakersfield, California.

  
SERENA BRAVO