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2 Environment & Natural Resources Division

EXEMPT FROM FILING FEES
3 UNDER GOVERNMENT CODE
§6103

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15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
16 **COUNTY OF LOS ANGELES**

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| 17 Coordination Proceeding 18 Special Title (Rule 1550 (b)), 19 ANTELOPE VALLEY GROUNDWATER 20 CASES | 21 Judicial Council Coordination 22 Proceeding No. 4408 23 [Assigned to the Honorable Jack Komar, 24 Judge Santa Clara County Superior Court, 25 Dept. 17] 26 Santa Clara Court Case No. 1-05-CV-049053 27 NOTICE OF OBJECTION TO NOTICE 28 OF DEPOSITION |
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To Robert G. Kuhs, attorney of record for Tejon Ranchcorp and Tejon Ranch Company

1 Granite Construction Company, the Noticing Parties described below, and all other counsel of
2 record in the Antelope Valley Groundwater Cases.

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4 PLEASE TAKE NOTICE that the United States, cross-defendant in the above action, pursuant to
5 Cal.C.C.P. § 2025.410, objects to Tejon Ranchcorp and Tejon Ranch Company, Granite
6 Construction Company, Antelope Valley Water Storage LLC, Little Rock Sand and Gravel, Inc.,
7 Littlerock Aggregate Co., Inc. dba Antelope Valley Aggregate, Inc., A.C. Warnack, as Trustee of
8 The A.C. Wamack Trust A. V. Materials, Inc., The George and Charlene Lane Family Trust,
9 Holliday Rock Co., Inc., Antelope Valley Ground Water Agreement Association, Copa De Oro
10 Land Company, Diamond Farming Company, Crystal Organic Farms LLC, U.S. Borax, Inc.,
11 Bolthouse Properties, LLC., Wm. Bolthouse Farms, Inc., and Landinv, Inc. (collectively the
12 “Noticing Parties”) notice of deposition of the identified federal witnesses for the Phase IV trial,
13 dated February 22, 2013, on the following grounds:
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17 1. The notice of deposition is untimely as to deponents June A. Oberdorfer and Gerald
18 Boetsch. *See* Second Amendment to Case Management Order for Phase Four Trial,
19 dated February 15, 2013 (“no deposition will be noticed on less than 5 court days’
20 notice”).”
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- 22 2. The notice of deposition fails to specify with sufficient particularity the things to be
23 produced at the deposition. See [Code Civ. Proc., § 2025.210](#)
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- 25 3. The notice of deposition fails to describe the areas to be covered during the deposition as
26 required by [Code Civ. Proc., § 2025.220](#).
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4. The request for production of documents of the United States' witnesses calls for irrelevant information, is overbroad, vague and ambiguous, unduly burdensome and oppressive.

Dated this 23rd day of February 2013.

FOR THE UNITED STATES:

_____/s/_____
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