

1 JOHN S. TOOTLE, Bar No. 181822
2 CALIFORNIA WATER SERVICE COMPANY
3 2632 WEST 237TH STREET
4 TORRANCE, CA, 90505
5 jtootle@calwater.com
6 (310) 377-1716 (Direct)
7 (310) 257-1400 ext. 74312
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9 Attorney for: CALIFORNIA WATER SERVICE COMPANY
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12 SUPERIOR COURT OF THE STATE OF CALIFORNIA
13 FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT
14
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16 ANTELOPE VALLEY GROUNDWATER)
17 CASES)

**JUDICIAL COUNCIL
COORDINATED PROCEEDING
NO. 4408**

18)
19 Included Actions:)
20)

21 Los Angeles County Waterworks District No.)
22 40 v. Diamond Farming Company)
23 Superior Court of California, County of Los)
24 Angeles, Case No. BC325201)
25)

**Santa Clara Case No. 1-05-CV-049053
Assigned to the Honorable Jack Komar
Department I**

26 Los Angeles County Waterworks District)
27 No. 40 v. Diamond Farming Co.)
28 Superior Court of California)
29 County of Kern, Case No. S-1500-CV-254-348)
30)

**CALIFORNIA WATER SERVICE
COMPANY'S RESPONSES TO
DEMAND FOR PRODUCTION OF
DOCUMENTS BY UNITED STATES**

31 Wm. Bolthouse Farms, Inc. v. City of Lancaster)
32 Diamond Farming Co. v. City of Lancaster)
33 Diamond Farming Co. v. Palmdale Water District)
34 Superior Court of California)
35 County of Riverside, Consolidated Actions)
36 Case Nos. RIC 353840, RIC 344436, RIC 344668)
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Trial Date: February 10, 2014
Time: 9:00 a.m.
Dept: TBD

1 California Water Service Company (Cal Water, Company or Responding Party), an investor-
2 owned public water utility, regulated by the California Public Utilities Commission (Commission),
3 responses to United States (Propounding Party) Demand for Production of Documents, Set One,
4 propounded on the Public Water Suppliers (PWS). The Company does not intend to challenge United
5 States' Federal Reserve Water Right claim in Phase V of the Antelope Valley Adjudication. As such, it is
6 the Company's understanding that United States has narrowed its discovery to Request for Admissions
7 (RFA) 3-9, Form Interrogatory 17.1, Non-Form Interrogatories 15-18, 27-30, and 33 and Request for
8 Production of Documents 1-3.

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10 PRELIMINARY STATEMENT

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12 The Company is in the process of conducting its investigation and discovery in this matter. At this
13 time, the Company has not completed its own investigation or discovery. The Company responses to the
14 best of its knowledge to United States' Demand for Production of Documents, Set One, but in doing so,
15 reserves all its rights to amend its responses at a future date if necessary. Furthermore, the Company
16 reserves the right to offer, at the time of trial, facts, testimony or other evidence discovered subsequent to
17 and not included in these responses.

18 By these responses, the Company makes no admission concerning the relevance or admissibility
19 of any of the evidence cited, and reserves the right to make all pertinent evidentiary objections at trial or
20 at any other stage of the proceedings. Furthermore, the fact that the Company has responded to any
21 Demand for Production of Documents should not be taken as an acceptance or admission that the
22 Company accepts or admits the existence of any facts set forth or assumed by such demand.

23
24 GENERAL OBJECTIONS

25
26 The Company objects to each and every Demand for Production of Documents to the extent that it
27 seeks to discover information that is protected by the attorney-client, work product, legislative thought
28 process and/or official information privilege, or any other applicable privilege. Furthermore, the
29 Company's response shall not constitute or be deemed a waiver, either expressed or implied, of any
30 applicable privilege.

31 The Company also objects to each and every Demand for Production of Documents to the extent
32 that it seeks to discover information or materials not presently in the Company's possession or is in the
33 public domain, equally available to all parties to this litigation. The following responses are provided
34 without prejudice to the Company's right to produce or rely on any evidence subsequently discovered.

35 The Company further objects to Special Interrogatories because all interrogatories, as stated, are
36 overly broad, lack specificity and do not conform to statutes.

37
38 Request for Production No. 1:

1 Produce all DOCUMENTS supporting any contention that YOU made in response to the non-form
2 interrogatories (set one) served upon YOU concurrently with this request.
3

4 Response to Request for Production No. 1:

5 The Company incorporates its Preliminary Statement and General Objections. Furthermore, the
6 Interrogatory is ambiguous, states fact not in evidence, and seeks an expert opinion on an issue of law and
7 is therefore improper. See Documents Produced in connection with Phase III and IV Trial Discovery. The
8 Company will produce all relevant documents, subject to the General Objections, in its custody that have
9 not already been produced, posed to the court's website, or previously made available for inspection and
10 copying.
11

12
13 Request for Production No. 2:

14 Produce all DOCUMENTS identified in YOUR response to the non-form interrogatories (set one)
15 served upon YOU concurrently with this request.
16

17 Response to Request for Production No. 2:

18 The Company incorporates its Preliminary Statement and General Objections. Furthermore, the
19 Interrogatory is ambiguous, states fact not in evidence, and seeks an expert opinion on an issue of law and
20 is therefore improper. See Documents Produced in connection with Phase III and IV Trial Discovery.
21 The Company will produce all relevant documents, subject to the General Objections, in its custody that
22 have not already been produced, posed to the court's website, or previously made available for inspection
23 and copying.
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26 Request for Production No. 3:

27 Produce all DOCUMENTS identified in YOUR response to form interrogatory 15.1 and 17.1
28 served upon you concurrently with this request.
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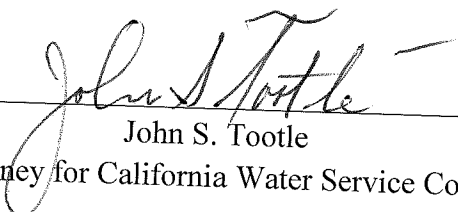
30 Response to Request for Production No. 3:

31 The Company incorporates its Preliminary Statement and General Objections. Furthermore, the
32 Interrogatory is ambiguous, states fact not in evidence, and seeks an expert opinion on an issue of law and
33 is therefore improper. See Documents Produced in connection with Phase III and IV Trial Discovery.
34 The Company will produce all relevant documents, subject to the General Objections, in its custody that
35 have not already been produced, posed to the court's website, or previously made available for inspection
36 and copying.
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DATED: November 12, 2013

CALIFORNIA WATER SERVICE COMPANY

By: 
John S. Tootle
Attorney for California Water Service Company

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PROOF OF SERVICE

I am employed in Los Angeles County, State of California; I am over eighteen years of age and not a party to the ANTELOPE VALLEY GROUNDWATER BASIN ADJUDICATION. My business address is 2632 West 237th Street, Torrance, California 90505.

On November 12, 2013 at my place of business at 2632 West 237th Street, Torrance, California 90505, a copy of the following documents(s):

CALIFORNIA WATER SERVICE COMPANY'S RESPONSE TO DEMAND FOR PRODUCTION OF DOCUMENTS BY UNITED STATES

By posting the documents listed above to the Santa Clara Superior Court website in regard to the Antelope Valley Groundwater Adjudication matter;

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

Executed on November 12, 2013



Michael Duque