

1 **RYAN S. BEZERRA, State Bar No. 178048**  
2 **JOSHUA M. HOROWITZ, State Bar No. 186866**  
3 **KATRINA C. GONZALES, State Bar No. 258412**  
4 **BARTKIEWICZ, KRONICK & SHANAHAN**  
5 **A PROFESSIONAL CORPORATION**  
6 **1011 TWENTY-SECOND STREET**  
7 **SACRAMENTO, CALIFORNIA 95816-4907**  
8 **TELEPHONE: (916) 446-4254**  
9 **TELECOPIER: (916) 446-4018**  
10 **E-MAIL: rsb@bkslawfirm.com**

11 **Attorneys for Cross-Defendant**  
12 **Copa De Oro Land Company**

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
14 **COUNTY OF LOS ANGELES**

15 **Coordination Proceeding Special Title**  
16 **(Rule 1550(b))**

17 **ANTELOPE VALLEY GROUNDWATER**  
18 **CASES**

19 **Included Actions:**

20 **Los Angeles County Waterworks District**  
21 **No. 40 v. Diamond Farming Co., Superior**  
22 **Court of California, County of Los Angeles,**  
23 **Case No. BC 325 201;**

24 **Los Angeles County Waterworks District**  
25 **No. 40 v. Diamond Farming Co., Superior**  
26 **Court of California, County of Kern, Case**  
27 **No. S-1500-CV-254-348;**

28 **Wm. Bolthouse Farms, Inc. v. City of**  
**Lancaster, Diamond Farming Co. v.**  
**Lancaster, Diamond Farming Co. v.**  
**Palmdale Water Dist., Superior Court of**  
**California, County of Riverside, Case No.**  
**RIC 353 840, RIC 344 436, RIC 344 668**

**JUDICIAL COUNCIL COORDINATION**  
**PROCEEDING NO. 4408**

**Case No. BC 391869**  
**Assigned to Hon. Jack Komar**

**(Santa Clara Case No. 01-05-CV-049053)**

**COPA DE ORO LAND COMPANY'S**  
**FIRST SET OF REQUESTS FOR**  
**ADMISSIONS PROPOUNDED ON**  
**PARTIES THAT ARE NOT**  
**SIGNATORIES TO THE**  
**STIPULATIONS CONCERNING COPA**  
**DE ORO LAND COMPANY**

1 **PROPOUNDING PARTY:** Copa de Oro Land Company

2 **RESPONDING PARTY:** Every party that is not a signatory to both the Stipulation  
3 Regarding Facts Pertaining to Copa de Oro Land Company for  
4 Trial and the Stipulation for Phase IV Trial Regarding Water Use  
5 on Copa de Oro Land Company's Property, posted on the Court's  
6 Web site on February 28, 2013 and April 19, 2013, respectively

6 **SET:** One

7 **PRELIMINARY STATEMENT**

8 Pursuant to Code of Civil Procedure section 2030.010 et seq., Copa de Oro Land  
9 Company respectfully requests that responding party answer, under oath, the Requests for  
10 Admissions [Set One] within five court days of service as follows:

11 **REQUESTS FOR ADMISSIONS**

12 **REQUEST FOR ADMISSION NO. 1:**

13 Admit that Copa de Oro Land Company owns the property identified as Kern County  
14 Assessor's Parcel Number 359-032-01 in Kern County, California.

15 **REQUEST FOR ADMISSION NO. 2:**

16 Admit that Copa de Oro Land Company owns the property identified as Kern County  
17 Assessor's Parcel Number 359-032-17 in Kern County, California.

18 **REQUEST FOR ADMISSION NO. 3:**

19 Admit that the total amount of water delivered by the Antelope-Valley East Kern Water  
20 Agency to the PROPERTY in 2000 was, rounded to the nearest acre-foot, 708 acre feet. For  
21 purposes of this Request for Admission, the term "PROPERTY" means those parcels identified  
22 as Kern County Assessor's Parcel Numbers 359-032-01 and 359-032-17.

23 **REQUEST FOR ADMISSION NO. 4:**

24 Admit that the total amount of water delivered by Antelope-Valley East Kern Water  
25 Agency to the PROPERTY in 2001 was, rounded to the nearest acre-foot, 829 acre feet. For  
26 purposes of this Request for Admission, the term "PROPERTY" means those parcels identified  
27 as Kern County Assessor's Parcel Numbers 359-032-01 and 359-032-17.  
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1 **REQUEST FOR ADMISSION NO. 5:**

2 Admit that the total amount of water delivered by Antelope Valley-East Kern Water  
3 Agency to the PROPERTY in 2002 was, rounded to the nearest acre-foot, 842 acre feet. For  
4 purposes of this Request for Admission, the term "PROPERTY" means those parcels identified  
5 as Kern County Assessor's Parcel Numbers 359-032-01 and 359-032-17.

6 **REQUEST FOR ADMISSION NO. 6:**

7 Admit that the total amount of water delivered by Antelope Valley-East Kern Water  
8 Agency to the PROPERTY in 2003 was, rounded to the nearest acre-foot, 867 acre feet. For  
9 purposes of this Request for Admission, the term "PROPERTY" means those parcels identified  
10 as Kern County Assessor's Parcel Numbers 359-032-01 and 359-032-17.

11 **REQUEST FOR ADMISSION NO. 7:**

12 Admit that the total amount of water delivered by Antelope Valley-East Kern Water  
13 Agency to the PROPERTY in 2004 was, rounded to the nearest acre-foot, 626 acre feet. For  
14 purposes of this Request for Admission, the term "PROPERTY" means those parcels identified  
15 as Kern County Assessor's Parcel Numbers 359-032-01 and 359-032-17.

16 **REQUEST FOR ADMISSION NO. 8:**

17 Admit that 708 acre-feet of water was used for agricultural purposes on the  
18 PROPERTY in 2000. For purposes of this Request for Admission, the term "PROPERTY"  
19 means those parcels identified as Kern County Assessor's Parcel Numbers 359-032-01 and  
20 359-032-17.

21 **REQUEST FOR ADMISSION NO. 9:**

22 Admit that 829 acre-feet of water was used for agricultural purposes on the  
23 PROPERTY in 2001. For purposes of this Request for Admission, the term "PROPERTY"  
24 means those parcels identified as Kern County Assessor's Parcel Numbers 359-032-01 and  
25 359-032-17.

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1 **REQUEST FOR ADMISSION NO. 10:**

2 Admit that 842 acre-feet of water was used for agricultural purposes on the  
3 PROPERTY in 2002. For purposes of this Request for Admission, the term "PROPERTY"  
4 means those parcels identified as Kern County Assessor’s Parcel Numbers 359-032-01 and  
5 359-032-17.

6 **REQUEST FOR ADMISSION NO. 11:**

7 Admit that 867 acre-feet of water was used for agricultural purposes on the  
8 PROPERTY in 2003. For purposes of this Request for Admission, the term "PROPERTY"  
9 means those parcels identified as Kern County Assessor’s Parcel Numbers 359-032-01 and  
10 359-032-17.

11 **REQUEST FOR ADMISSION NO. 12:**

12 Admit that 626 acre-feet of water was used for agricultural purposes on the  
13 PROPERTY in 2004. For purposes of this Request for Admission, the term "PROPERTY"  
14 means those parcels identified as Kern County Assessor’s Parcel Numbers 359-032-01 and  
15 359-032-17.

16 Dated: \_\_\_\_\_, 2013

Respectfully submitted,

BARTKIEWICZ, KRONICK & SHANAHAN

19 By: \_\_\_\_\_

Ryan S. Bezerra

Attorneys for Copa de Oro Land Company

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**PROOF OF SERVICE**

I, Terry M. Olson, declare as follows:

I am a citizen of the United States and a resident of Sacramento County. I am over the age of 18, not a party to this action and am employed at Bartkiewicz, Kronick & Shanahan, 1011 Twenty-Second Street, Sacramento, California 95816. On March 14, 2013, I served, in the manner described below, the following document:

**COPA DE ORO LAND COMPANY’S FIRST SET OF REQUESTS FOR ADMISSIONS  
PROPOUNDED ON PARTIES THAT ARE NOT SIGNATORIES TO THE  
STIPULATIONS CONCERNING COPA DE ORO LAND COMPANY**

I posted this document to the Court’s World Wide Website located at [www.scefiling.org](http://www.scefiling.org).

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

Executed at Sacramento, California on \_\_\_\_\_, 2013.

\_\_\_\_\_  
Terry M. Olson