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9 Attorneys for Defendants, JOHNNY ZAMRZLA,
10 PAMELLA ZAMRZLA, JOHNNY LEE
11 ZAMRZLA AND JEANETTE ZAMRZLA

12 SUPERIOR COURT OF THE STATE OF CALIFORNIA
13 COUNTY OF LOS ANGELES – CENTRAL DISTRICT

14 Coordinated Proceeding,
15 Special Title (Rule 1550(b))

Judicial Council Coordination
Proceeding No.: 4408

16 ANTELOPE VALLEY
17 GROUNDWATER CASES.

LASC Case No. BC325201

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

SPECIAL INTERROGATORIES, SET ONE

18 PROPOUNDING PARTY: JOHNNY ZAMRZLA, PAMELLA ZAMRZLA, JOHNNY LEE
19 ZAMRZLA AND JEANETTE ZAMRZLA

20 RESPONDING PARTY: GRIMMWAY ENTERPRISES

21 SET NUMBER: ONE

22 JOHNNY ZAMRZLA, PAMELLA ZAMRZLA, JOHNNY LEE ZAMRZLA AND
23 JEANETTE ZAMRZLA request that plaintiff GRIMMWAY ENTERPRISES admit or deny the
24 following Requests for Admission under oath and in writing within 30 days, pursuant to Code of
25 Civil Procedure section 2033.010.

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1 **INSTRUCTIONS**

2 1. You are required to serve a written response, under oath, within the time allowed by
3 California Code of Civil Procedure section 2033.250, or other such time as agreed by stipulation
4 of the parties.

5 2. If you object to any request, such objection must be fully and specifically stated,
6 including grounds therefore pursuant to California Code of Civil Procedure section 2033.230.

7 3. If your response to any of the following Requests for Admissions is anything other
8 than an unqualified admission, please answer Form Interrogatory 17.1 served concurrently.

9 **DEFINITIONS**

10 Words in **BOLDFACE CAPITALS** in these interrogatories are defined as follows:

11 (a) **INCIDENT** includes the circumstance and events surrounding the alleged accident,
12 injury or other occurrence, giving rise to this action or proceeding.

13 (b) **YOU OR ANYONE ACTING ON YOUR BEHALF** includes you, your agents,
14 your employees, your insurance companies, their agents, their employees, your attorneys, your
15 accountants, your investigators, and anyone else acting on your behalf.

16 (c) **DOCUMENT(S)** means a writing, as defined in Evidence Code section 250, and
17 includes the original or a copy of handwriting, typewriting, printing, photostating, photographing,
18 and every other means of recording upon any tangible thing and form of communicating or
19 representation, including letters, words, pictures, sounds, or symbols, or combinations of them.

20 (d) **PROPERTY** refers to the **PROPERTY** owned by Johnny and Pamela Lancaster,
21 located at or about 48910 80th St. West, Lancaster, Los Angeles County, California, and identified
22 as parcels APN 3220-006-026, 3220-006-002, and 3220-006-003.

23 **SPECIAL INTERROGATORIES**

24 **SPECIAL INTERROGATORY NO. 1:**

25 Do YOU contend the JOHNNY AND PAMELLA ZAMRZLA are “Small Pumpers” as that
26 term is defined by the 2015 Antelope Valley Groundwater Judgment and Physical Solution?

27 **SPECIAL INTERROGATORY NO. 2:**

28 If YOU contend the JOHNNY AND PAMELLA ZAMRZLA are “Small Pumpers” as that

1 term is defined by the 2015 Antelope Valley Groundwater Judgment and Physical Solution, state
2 all facts that support YOUR contention.

3 **SPECIAL INTERROGATORY NO. 3:**

4 If YOU contend the JOHNNY AND PAMELLA ZAMRZLA are “Small Pumpers” as that
5 term is defined by the 2015 Antelope Valley Groundwater Judgment and Physical Solution, identify
6 all PERSONS with knowledge of facts that support YOUR contention.

7 **SPECIAL INTERROGATORY NO. 4:**

8 If YOU contend the JOHNNY AND PAMELLA ZAMRZLA are “Small Pumpers” as that
9 term is defined by the 2015 Antelope Valley Groundwater Judgment and Physical Solution, identify
10 all DOCUMENTS that support YOUR contention.

11 **SPECIAL INTERROGATORY NO. 5:**

12 Do YOU contend the JOHNNY AND PAMELLA ZAMRZLA never pumped more than 25
13 acre-feet of water per year in any year in which they owned their PROPERTY?

14 **SPECIAL INTERROGATORY NO. 6:**

15 If YOU contend the JOHNNY AND PAMELLA ZAMRZLA never pumped more than 25
16 acre-feet of water per year in any year in which they owned their PROPERTY, state all facts that
17 support YOUR contention.

18 **SPECIAL INTERROGATORY NO. 7:**

19 If YOU contend the JOHNNY AND PAMELLA ZAMRZLA never pumped more than 25
20 acre-feet of water per year in any year in which they owned their PROPERTY, identify all
21 PERSONS with knowledge of facts that support YOUR contention.

22 **SPECIAL INTERROGATORY NO. 8:**

23 If YOU contend the JOHNNY AND PAMELLA ZAMRZLA never pumped more than 25
24 acre-feet of water per year in any year in which they owned their PROPERTY, identify all
25 DOCUMENTS that support YOUR contention.

26 **SPECIAL INTERROGATORY NO. 9:**

27 How much water did YOU use in YOUR agricultural use of land leased from JOHNNY
28 AND PAMELLA ZAMRZLA in each year from 2000-2015?


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SPECIAL INTERROGATORY NO. 10:

State what crops you grew on land leased from JOHNNY AND PAMELLA ZAMRZLA in each year from 2000-2015.

Dated: May 25, 2022

MATHENY SEARS LINKERT & JAIME, LLP

By: 

NICHOLAS R. SHEPARD, ESQ.,
Attorney for Defendants, JOHNNY
ZAMRZLA, PAMELLA ZAMRZLA,
JOHNNY LEE ZAMRZLA AND
JEANETTE ZAMRZLA

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PROOF OF SERVICE
[Code Civ. Proc. §§ 1011, 1013, 1013(a)(3) & 2015.5]

ANTELOPE VALLEY GROUNDWATER CASES
Case No. 1-05-CV-049053 (For filing purposes only)
JCCP 4408

(STATE OF CALIFORNIA, COUNTY OF SACRAMENTO)

I am a resident of the United States and employed in Sacramento County. I am over the age of eighteen years and not a party to the within entitled action. My business address is 3638 American River Drive, Sacramento, California.

On May 25, 2022, I served the following documents on the parties in this action described as follows:

SPECIAL INTERROGATORIES, SET ONE TO GRIMMWAY ENTERPRISES

- BY ELECTRONIC SERVICE:** by posting the document(s) listed above to the Antelope Valley Groundwater Cases to all parties listed on the Santa Clara Superior Court Service List as maintained via Glotrans. Electronic service completed through <http://www.avwatermaster.org>.
- BY OVERNIGHT MAIL:** by causing document(s) to be picked up by an overnight delivery service company for delivery to the address(es) on the next business day.

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

Executed on this 25th day of May 2022, at Sacramento, California.


Kym Green