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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))

16 ANTELOPE VALLEY  
17 GROUNDWATER CASES.

Judicial Council Coordination  
Proceeding No.: 4408

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

**REQUESTS FOR PRODUCTION OF  
DOCUMENTS, SET ONE**

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

21 RESPONDING PARTY: GRIMMWAY ENTERPRISES

22 SET NUMBER: ONE

23 Pursuant to Code of Civil Procedure § 2031.010, defendant, GENERAL TOOL, INC.,  
24 hereby demands that plaintiff RAFAEL BIXCUL respond in writing to and produce each and every  
25 document which is either specifically described or reasonably particularized in a category of  
26 documents listed below and which are within the possession, custody or control of plaintiff.

27 Defendant hereby demands that, pursuant to stipulation, upon 20 days from the service of  
28 the inspection demand an original and copy of the response shall be served on the demanding party

1 and all other parties who have appeared.

2 **DEFINITIONS**

3 The words in **BOLD FACE CAPITALS** in these Requests for Production are defined as  
4 follows:

5 (a) **YOU, YOUR, OR ANYONE ACTING ON YOUR BEHALF** includes you, your  
6 agents, your employees, your insurance companies, their agents, their employees, your attorneys,  
7 your accountants, your investigators, and anyone else acting on your behalf.

8 (b) **PERSON** includes a natural person firm, association, organization, partnership,  
9 business, trust, corporation, or public entity.

10 (c) **INCIDENT** includes the circumstance and events surrounding the alleged accident,  
11 injury, or other occurrence on May 18, 2018, giving rise to this action or proceeding.

12 (d) **DOCUMENT** and/or **WRITING**, as defined in Evidence Code section 250,  
13 includes the original or a copy of handwriting, typewriting, printing, photostating, photographing,  
14 and every other means of recording upon any tangible thing and form of communicating or  
15 representation, including letters, words, pictures, sounds, or symbols, or combinations of them.

16 (e) **PROPERTY** refers to the **PROPERTY** owned by Johnny and Pamela Lancaster,  
17 located at or about 48910 80<sup>th</sup> St. West, Lancaster, Los Angeles County, California, and identified  
18 as parcels APN 3220-006-026, 3220-006-002, and 3220-006-003.

19 **DOCUMENT REQUESTS**

20 **DEMAND FOR PRODUCTION NO. 1:**

21 Any and all lease agreements relating to YOUR leasing of land from JOHNNY AND  
22 PAMELLA ZAMRZLA since the year 2000.

23 **DEMAND FOR PRODUCTION NO. 2:**

24 Any and all DOCUMENTS relating to water YOU used on land owned by JOHNNY AND  
25 PAMELLA ZAMRZLA since the year 2000.

26 **DEMAND FOR PRODUCTION NO. 3:**

27 Any and all DOCUMENTATS relating to YOUR use of land owned by JOHNNY AND  
28 PAMELLA ZAMRZLA since the year 2000.

1 **DEMAND FOR PRODUCTION NO. 4:**

2 Any and all DOCUMENTS relating to crops grown by YOU on land owned by JOHNNY  
3 AND PAMELLA ZAMRZLA since the year 2000.

4 **DEMAND FOR PRODUCTION NO. 5:**

5 Any and all DOCUMENTS relating to payments made by YOU to JOHNNY AND  
6 PAMELLA ZAMRZLA for leasing or use of land since the year 2000.

7 **DEMAND FOR PRODUCTION NO. 6:**

8 Any and all DOCUMENTS relating to payments made by YOU to JOHNNY AND  
9 PAMELLA ZAMRZLA for water use since the year 2000.

10 **DEMAND FOR PRODUCTION NO. 7:**

11 Any and all DOCUMENTS relating to YOUR use of JOHNNY AND PAMELLA  
12 ZAMRZLA's well(s) since the year 2000.

13 **DEMAND FOR PRODUCTION NO. 8:**

14 Any and all DOCUMENTS identified in YOUR response to Form Interrogatory No. 17.1,  
15 served concurrently herewith.

16 **DEMAND FOR PRODUCTION NO. 9:**

17 Any and all DOCUMENTS identified in YOUR response to Special Interrogatory No. 4,  
18 served concurrently herewith.

19 **DEMAND FOR PRODUCTION NO. 10:**

20 Any and all DOCUMENTS identified in YOUR response to Special Interrogatory No. 8,  
21 served concurrently herewith.

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23 Dated: May 25, 2022

**MATHENY SEARS LINKERT & JAIME, LLP**

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By: 

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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:

**REQUEST FOR PRODUCTION OF DOCUMENTS, 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