

1 Law Offices of
2 **MATHENY SEARS LINKERT & JAIME, LLP**
3 NICHOLAS R. SHEPARD, ESQ. (SBN 300629)
4 3638 American River Drive
5 Sacramento, California 95864
6 Telephone: (916) 978-3434
7 Facsimile: (916) 978-3430
8 nshepard@mathenysears.com

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 ADMISSION, 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 Pursuant to Code of Civil Procedure sections 2030.020(a) and 2030.030, JOHNNY
23 ZAMRZLA, PAMELLA ZAMRZLA, JOHNNY LEE ZAMRZLA AND JEANETTE ZAMRZLA
24 hereby demand that GRIMMWAY ENTERPRISES answer the following interrogatories under
25 oath within thirty (30) days, pursuant to Code of Civil Procedure section 2030.260, or as otherwise
26 agreed by stipulation.

27 **DEFINITIONS**

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

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

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

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

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

13 **REQUESTS FOR ADMISSION**

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

15 Admit YOU leased land from JOHNNY AND PAMELLA ZAMRZLA.

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

17 Admit the land YOU leased from JOHNNY AND PAMELLA ZAMRZLA was located at
18 or about 48910 80th St. West, Lancaster, Los Angeles County, California, and at or about parcels
19 APN 3220-006-026, 3220-006-002, and 3220-006-003.

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

21 Admit the land YOU leased from JOHNNY AND PAMELLA ZAMRZLA was used for
22 purposes of agricultural production.

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

24 Admit YOU leased land from JOHNNY AND PAMELLA ZAMRZLA for purposes of
25 agricultural production.

26 **REQUEST FOR ADMISSION NO. 5:**

27 Admit YOU used water pumped from wells owned by JOHNNY AND PAMELLA
28 ZAMRZLA.

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

2 Admit YOU used water pumped from wells owned by JOHNNY AND PAMELLA
3 ZAMRZLA for purposes of agricultural production.

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

5 Admit the amount of water YOU used from wells owned by JOHNNY AND PAMELLA
6 ZAMRZLA, in each year YOU used such water, exceeded 25 acre-feet.

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

8 Admit that due to YOUR use of the ZAMRZLA's land and water, YOU have personal
9 knowledge that JOHNNY AND PAMELLA ZAMRZLA's water use exceeded 25 acre-feet in each
10 year YOU used such water.

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

12 Admit JOHNNY AND PAMELLA ZAMRZLA's year 2000 water use exceeded 25 acre-
13 feet.

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

15 Admit JOHNNY AND PAMELLA ZAMRZLA's year 2001 water use exceeded 25 acre-
16 feet.

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

18 Admit JOHNNY AND PAMELLA ZAMRZLA's year 2002 water use exceeded 25 acre-
19 feet.

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

21 Admit JOHNNY AND PAMELLA ZAMRZLA's year 2003 water use exceeded 25 acre-
22 feet.

23 **REQUEST FOR ADMISSION NO. 13:**

24 Admit JOHNNY AND PAMELLA ZAMRZLA's year 2004 water use exceeded 25 acre-
25 feet.

26 **REQUEST FOR ADMISSION NO. 14:**

27 Admit JOHNNY AND PAMELLA ZAMRZLA's year 2005 water use exceeded 25 acre-
28 feet.

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

2 Admit JOHNNY AND PAMELLA ZAMRZLA's year 2006 water use exceeded 25 acre-
3 feet.

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

5 Admit JOHNNY AND PAMELLA ZAMRZLA's year 2007 water use exceeded 25 acre-
6 feet.

7 **REQUEST FOR ADMISSION NO. 17:**

8 Admit JOHNNY AND PAMELLA ZAMRZLA's year 2008 water use exceeded 25 acre-
9 feet.

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

11 Admit JOHNNY AND PAMELLA ZAMRZLA's year 2009 water use exceeded 25 acre-
12 feet.

13 **REQUEST FOR ADMISSION NO. 19:**

14 Admit JOHNNY AND PAMELLA ZAMRZLA's year 2010 water use exceeded 25 acre-
15 feet.

16
17 Dated: May 25, 2022

MATHENY SEARS LINKERT & JAIME, LLP

18
19 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:

REQUEST FOR ADMISSIONS, 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