

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](mailto:nshepard@mathenysears.com)

9 Attorneys for Defendants, JOHNNY ZAMRZLA,  
10 PAMELLA ZAMRZLA, JOHNNY LEE  
11 ZAMRZLA AND JEANETTE ZAMRZLA  
12 (collectively "ZAMRZLA'S")

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

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

17 ANTELOPE VALLEY  
18 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

**JOHNNY ZAMRZLA'S RESPONSES TO  
SETTLING PARTIES' DEMAND FOR  
PRODUCTION OF DOCUMENTS, SET ONE**

19 PROPOUNDING PARTY: SETTLING PARTIES

20 RESPONDING PARTY: JOHNNY ZAMRZLA

21 SET NUMBER: One

22 Pursuant to Code of Civil Procedure Section 2030.210, et seq, JOHNNY ZAMRZLA  
23 responds to SETTLING PARTIES' Request for Production of Documents, Set One, as follows:

24 **PRELIMINARY STATEMENT**

25 It should be noted that responding party has not fully completed his investigation of the  
26 facts relating to the case, has not fully completed his discovery in this action, and has not completed  
27 his preparation for trial. All of the answers contained herein are based only upon such information  
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1 and documents which are presently available to and specifically known to responding party and  
2 disclose only those contentions which presently occur to responding party. It is anticipated that  
3 further discovery, independent investigation, legal research, and analysis will supply additional  
4 facts, add meaning to known facts, as well as establish entirely new factual conclusions and legal  
5 contentions, all of which may lead to substantial additions to, changes in, and variations from the  
6 contentions herein set forth. The following responses are given without prejudice to responding  
7 party's right to produce evidence of any subsequently discovered fact or facts which responding  
8 party may later develop.

9 The answers contained herein are made in a good faith effort to supply as much factual  
10 information and as much specification of legal contentions as is presently known but should in no  
11 way be to the prejudice of responding party in relation to further discovery, research or analysis.

### 12 **GENERAL OBJECTIONS AND RESERVATIONS**

13 1. Responding party objects to each and every direction, instruction, and request to the  
14 extent that it purports to impose any requirement or discovery obligation on responding party other  
15 than as set forth in the California Code of Civil Procedure and applicable Rules of this Court.

16 2. Responding party objects to each and every request or interrogatory to the extent  
17 that it seeks information protected by the attorney-client privilege, the attorney work product  
18 privilege, or any other applicable privilege.

### 19 **RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS**

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

21 All deeds RELATING TO the PROPERTY.

#### 22 **RESPONSE TO DEMAND NO. 1:**

23 Responding party objects that this request is overbroad as to time. This request seeks  
24 information that is not relevant to the subject matter of the litigation, and this request is not  
25 reasonably calculated to lead to the discovery of admissible evidence. This request seeks  
26 documents that are publicly available and thus equally available to propounding party. Without  
27 waiving said objections, responding party will comply with this request. Please see Z 000001-  
28 000005.

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

2 All title reports RELATING TO the PROPERTY.

3 **RESPONSE TO DEMAND NO. 2:**

4 Responding party objects that this request vague and ambiguous with respect to the term  
5 “title reports.” This request is overbroad as to time. This request seeks information that is not  
6 relevant to the subject matter of the litigation, and this request is not reasonably calculated to lead  
7 to the discovery of admissible evidence. Without waiving said objections, responding party will  
8 comply with this request. Please see Z 000006-000016.

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

10 All real property tax bills RELATING TO the PROPERTY since January 1, 2000.

11 **RESPONSE TO DEMAND NO. 3:**

12 Responding party objects that this request is overbroad as to time. This request seeks  
13 information that is not relevant to the subject matter of the litigation, and this request is not  
14 reasonably calculated to lead to the discovery of admissible evidence. This request seeks  
15 documents that are publicly available and thus equally available to propounding party. Without  
16 waiving said objections, responding party will comply with this request. Please see Z 000017-  
17 000055.

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

19 All photographs and video taken on or after January 1, 2000, depicting the PROPERTY or  
20 any portion thereof.

21 **RESPONSE TO DEMAND NO. 4:**

22 Responding party objects that this request is so overbroad as to scope and time as to be  
23 burdensome and harassing. This request seeks information that is not relevant to the subject matter  
24 of the litigation, and this request is not reasonably calculated to lead to the discovery of admissible  
25 evidence. This request invades responding party’s right to privacy. Given said objections,  
26 responding party invites propounding party to meet and confer concerning the scope of this request.  
27 Without waiving said objections, please see Z 000056-000098.

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

2 All photographs and video depicting any water well or any portion thereof on the  
3 PROPERTY.

4 **RESPONSE TO DEMAND NO. 5:**

5 Responding party objects that this request is overbroad as to time. This request seeks  
6 information that is not relevant to the subject matter of the litigation, and this request is not  
7 reasonably calculated to lead to the discovery of admissible evidence. Without waiving said  
8 objections, responding party will comply with this request. Please see Z 000136.

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

10 All photographs and video taken on or after January 1, 2000, depicting any electrical panel  
11 on the PROPERTY.

12 **RESPONSE TO DEMAND NO. 6:**

13 Responding party objects that this request is so overbroad as to scope and time as to be  
14 burdensome and harassing. This request seeks information that is not relevant to the subject matter  
15 of the litigation, and this request is not reasonably calculated to lead to the discovery of admissible  
16 evidence. This request invades responding party's right to privacy. Without waiving said  
17 objections, responding party is unable to comply with this request, as it has no responsive  
18 documents in its possession, custody, or control.

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

20 All DOCUMENTS RELATING TO each and every water well on the PROPERTY  
21 including, without limitation, drilling permits, drilling logs, installation, maintenance and repair  
22 records.

23 **RESPONSE TO DEMAND NO. 7:**

24 Responding party objects that this request vague and ambiguous with respect to the term  
25 "limitation, drilling permits, drilling logs, installation, maintenance and repair records." This  
26 request is overbroad as to scope and time. This request seeks information that is not relevant to the  
27 subject matter of the litigation, and this request is not reasonably calculated to lead to the discovery  
28 of admissible evidence. Without waiving said objections, responding party will comply with this

1 request. Please see Z 000099-000126.

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

3 All DOCUMENTS, including maps, plats and the like depicting the location of any water  
4 systems on the PROPERTY, including all mains, laterals, valves and sprinkler lines.

5 **RESPONSE TO DEMAND NO. 8:**

6 Responding party objects that this request vague and ambiguous with respect to the term  
7 “maps, plats and the like depicting the location of any water systems on the PROPERTY, including  
8 all mains, laterals, valves and sprinkler lines.” This request is overbroad as to scope and time. This  
9 request seeks information that is not relevant to the subject matter of the litigation, and this request  
10 is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving said  
11 objections, responding party will comply with this request. Please see Z 000127-000136.

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

13 All DOCUMENTS evidencing the amount of groundwater pumped from each well located  
14 on the PROPERTY since January 1, 2000.

15 **RESPONSE TO DEMAND NO. 9:**

16 Responding party objects that this request is overbroad as to scope and time. Without  
17 waiving said objections, responding party will comply with this request. Please see Z 000137-  
18 000219.

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

20 All Notices of Groundwater Extraction and Diversion (“NOTICES”) filed with the State  
21 Water Resources Control Board (“SWRCB”) or any regional office for the PROPERTY.

22 **RESPONSE TO DEMAND NO. 10:**

23 Responding party objects that this request is overbroad as to time. This request seeks  
24 information that is not relevant to the subject matter of the litigation, and this request is not  
25 reasonably calculated to lead to the discovery of admissible evidence. Without waiving said  
26 objections, responding party is unable to comply with this request, as it has no responsive  
27 documents in its possession, custody, or control.

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1 **DEMAND FOR PRODUCTION NO. 11:**

2 All COMMUNICATIONS with the SWRCB RELATING TO groundwater extraction for  
3 the PROPERTY.

4 **RESPONSE TO DEMAND NO. 11:**

5 Responding party objects that this request is overbroad as to time. This request seeks  
6 information that is not relevant to the subject matter of the litigation, and this request is not  
7 reasonably calculated to lead to the discovery of admissible evidence. Without waiving said  
8 objections, responding party is unable to comply with this request, as it has no responsive  
9 documents in its possession, custody, or control.

10 **DEMAND FOR PRODUCTION NO. 12:**

11 ALL DOCUMENTS RELATING TO the amount of electrical power used on the  
12 PROPERTY or any part thereof, since January 1, 2000, including all invoices and billing records,  
13 pump tests, and the like.

14 **RESPONSE TO DEMAND NO. 12:**

15 Responding party objects that this request is so overbroad as to scope and time as to be  
16 burdensome and harassing. This request seeks information that is not relevant to the subject matter  
17 of the litigation, and this request is not reasonably calculated to lead to the discovery of admissible  
18 evidence. This request invades responding party's right to privacy. Based on the above objections,  
19 responding party will not comply with this request. Given said objections, responding party invites  
20 propounding party to meet and confer concerning the scope of this request. Without waiving said  
21 objections, responding party will comply with this request. Please see Z 000137-000773.

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

23 All DOCUMENTS evidencing communications with Southern California Edison  
24 RELATING TO the PROPERTY or any part thereof.

25 **RESPONSE TO DEMAND NO. 13:**

26 Responding party objects that this request is so overbroad as to scope and time as to be  
27 burdensome and harassing. This request seeks information that is not relevant to the subject matter  
28 of the litigation, and this request is not reasonably calculated to lead to the discovery of admissible

1 evidence. This request invades responding party's right to privacy. Based on the above objections,  
2 responding party will not comply with this request. Given said objections, responding party invites  
3 propounding party to meet and confer concerning the scope of this request. Without waiving said  
4 objections, responding party will comply with this request. Please see Z 000774-000798.

5 **DEMAND FOR PRODUCTION NO. 14:**

6 All DOCUMENTS evidencing any pump test performed on the wells on the PROPERTY  
7 or any part thereof.

8 **RESPONSE TO DEMAND NO. 14:**

9 Responding party objects that this request is overbroad as to time. Without waiving said  
10 objections, responding party will comply with this request. Please see Z 000137-000219.

11 **DEMAND FOR PRODUCTION NO. 15:**

12 All DOCUMENTS evidencing the lease of the PROPERTY or any part thereof.

13 **RESPONSE TO DEMAND NO. 15:**

14 Responding party objects that this request is overbroad as to scope and time. This request  
15 seeks information that is not relevant to the subject matter of the litigation, and this request is not  
16 reasonably calculated to lead to the discovery of admissible evidence. This request invades  
17 responding party's right to privacy. Without waiving said objections, responding party is unable  
18 to comply with this request, as it has no responsive documents in its possession, custody, or control.

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

20 All DOCUMENTS evidencing the lease of any land adjacent to the PROPERTY or any part  
21 thereof since January 1, 2000.

22 **RESPONSE TO DEMAND NO. 16:**

23 Responding party objects that this request is overbroad as to scope and time. This request  
24 seeks information that is not relevant to the subject matter of the litigation, and this request is not  
25 reasonably calculated to lead to the discovery of admissible evidence. This request invades  
26 responding party's right to privacy. Without waiving said objections, responding party is unable  
27 to comply with this request, as it has no responsive documents in its possession, custody, or control.

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1 **DEMAND FOR PRODUCTION NO. 17:**

2 All DOCUMENTS evidencing COMMUNICATIONS with Gene Nebeker since January 1,  
3 2000.

4 **RESPONSE TO DEMAND NO. 17:**

5 Responding party objects that this request is overbroad as to scope and time. This request  
6 seeks information that is not relevant to the subject matter of the litigation, and this request is not  
7 reasonably calculated to lead to the discovery of admissible evidence. Responding party objects  
8 that this request falls outside the agreed upon scope of discovery and the issues to be addressed at  
9 the August 23, 2022 hearing. Without waiving said objections, responding party will comply with  
10 this request. Please see Z 000807-000973.

11 **DEMAND FOR PRODUCTION NO. 18:**

12 All DOCUMENTS evidencing COMMUNICATIONS with Jan Hendrix since January 1,  
13 2000.

14 **RESPONSE TO DEMAND NO. 18:**

15 Responding party objects that this request is overbroad as to scope and time. This request  
16 seeks information that is not relevant to the subject matter of the litigation, and this request is not  
17 reasonably calculated to lead to the discovery of admissible evidence. Responding party objects  
18 that this request falls outside the agreed upon scope of discovery and the issues to be addressed at  
19 the August 23, 2022 hearing. This request seeks documents protected by the attorney-client  
20 privilege and/or the attorney work product doctrine.

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

22 All DOCUMENTS evidencing the purchase of water from any source since January 1,  
23 2000.

24 **RESPONSE TO DEMAND NO. 19:**

25 Responding party objects that this request is overbroad as to scope and time. This request  
26 seeks information that is not relevant to the subject matter of the litigation, and this request is not  
27 reasonably calculated to lead to the discovery of admissible evidence. This request invades  
28 responding party's right to privacy. Without waiving said objections, responding party is unable



1 to comply with this request, as it has no responsive documents in its possession, custody, or control.

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

3 All DOCUMENTS evidencing any claimed overlying right to pump groundwater.

4 **RESPONSE TO DEMAND NO. 20:**

5 Responding party objects that this request falls outside the agreed upon scope of discovery  
6 and the issues to be addressed at the August 23, 2022 hearing. This request is burdensome and  
7 harassing.

8 **DEMAND FOR PRODUCTION NO. 21:**

9 YOUR current CV or resume.

10 **RESPONSE TO DEMAND NO. 21:**

11 Responding party objects that this request seeks information that is not relevant to the  
12 subject matter of the litigation, and this request is not reasonably calculated to lead to the discovery  
13 of admissible evidence. Without waiving said objections, responding party will comply with this  
14 request. Please see Z 000799-00806.

15 Dated: May 26, 2022

**MATHENY SEARS LINKERT & JAIME, LLP**

16  
17  
18 By: 

NICHOLAS R. SHEPARD, ESQ.,  
Attorney for Defendants, JOHNNY  
ZAMRZLA, PAMELLA ZAMRZLA,  
JOHNNY LEE ZAMRZLA AND  
JEANETTE ZAMRZLA (collectively  
"ZAMRZLA'S")

**VERIFICATION**

The undersigned hereby asserts as follows:

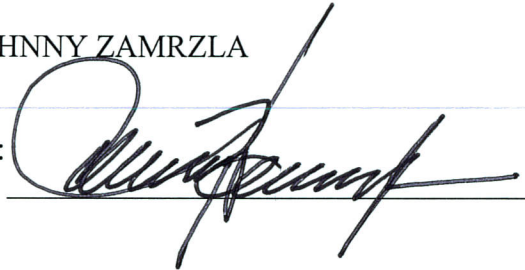
I, **JOHNNY ZAMRZLA**, am a party to the above-entitled proceeding. The matters contained in the foregoing **DEFENDANT JOHNNY ZAMRZLA'S RESPONSES TO SETTLING PARTIES' DEMAND FOR PRODUCTION OF DOCUMENTS, SET ONE** are of my own knowledge, except as to those matters therein stated on information and belief, and as to those matters I believe them to be true.

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

Executed on this 26 day of May 2022, at ARNDALE, California.

JOHNNY ZAMRZLA

By:

A handwritten signature in black ink, appearing to read 'Johnny Zamrzla', is written over a horizontal line. The signature is stylized and cursive.

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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 26, 2022, I served the following documents on the parties in this action described as follows:

**ZAMRZLAS' RESPONSE TO SETTling PARTIES' REQUEST FOR PRODUCTION OF DOCUMENTS, SET ONE**

- 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 26th day of May 2022, at Sacramento, California.

  
Kym Green