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

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

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

ANTELOPE VALLEY
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

**OBJECTION TO NOTICE OF DEPOSITION
OF PAMELLA ZAMRZLA AND REQUEST
FOR PRODUCTION OF DOCUMENTS**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Pursuant to California Code of Civil Procedure section 2025.410, Defendants JOHNNY ZAMRZLA, PAMELLA ZAMRZLA, JOHNNY LEE ZAMRZLA AND JEANETTE ZAMRZLA hereby object to the Notice of Taking Deposition of Pamella Zamrzla, and request for production of documents, as follows:

OBJECTIONS TO DEPOSITION

Defendants object that this deposition was unilaterally set. Nonetheless, Mrs. Zamrzla will appear for her deposition.

Defendants further object to this deposition to the extent it seeks information outside the

1 agreed-upon scope of the issues to be heard at the hearing on August 23, 2022.

2 **RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS**

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

4 All deeds RELATING TO the PROPERTY.

5 **RESPONSE TO DEMAND NO. 1:**

6 Responding party objects that this request is overbroad as to time. This request seeks
7 information that is not relevant to the subject matter of the litigation, and this request is not
8 reasonably calculated to lead to the discovery of admissible evidence. This request seeks
9 documents that are publicly available and thus equally available to propounding party.

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

11 All title reports RELATING TO the PROPERTY.

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

13 Responding party objects that this request vague and ambiguous with respect to the term
14 “title reports.” This request is overbroad as to time. This request seeks information that is not
15 relevant to the subject matter of the litigation, and this request is not reasonably calculated to lead
16 to the discovery of admissible evidence.

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

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

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

20 Responding party objects that this request is overbroad as to time. This request seeks
21 information that is not relevant to the subject matter of the litigation, and this request is not
22 reasonably calculated to lead to the discovery of admissible evidence. This request seeks
23 documents that are publicly available and thus equally available to propounding party.

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

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

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

28 Responding party objects that this request is so overbroad as to scope and time as to be

1 burdensome and harassing. This request seeks information that is not relevant to the subject matter
2 of the litigation, and this request is not reasonably calculated to lead to the discovery of admissible
3 evidence. This request invades responding party's right to privacy.

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

5 All photographs and video depicting any water well or any portion thereof on the
6 PROPERTY.

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

8 Responding party objects that this request is overbroad as to time. This request seeks
9 information that is not relevant to the subject matter of the litigation, and this request is not
10 reasonably calculated to lead to the discovery of admissible evidence.

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

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

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

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.

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.

DEMAND FOR PRODUCTION NO. 8:

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

RESPONSE TO DEMAND NO. 8:

Responding party objects that this request vague and ambiguous with respect to the term “maps, plats and the like depicting the location of any water systems on the PROPERTY, including all mains, laterals, values and sprinkler lines.” This request is overbroad as to scope and time. This request seeks information that is not relevant to the subject matter of the litigation, and this request is not reasonably calculated to lead to the discovery of admissible evidence.

DEMAND FOR PRODUCTION NO. 9:

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

RESPONSE TO DEMAND NO. 9:

Responding party objects that this request is overbroad as to scope and time.

DEMAND FOR PRODUCTION NO. 10:

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

RESPONSE TO DEMAND NO. 10:

Responding party objects that this request is overbroad as to time. This request seeks information that is not relevant to the subject matter of the litigation, and this request is not reasonably calculated to lead to the discovery of admissible evidence.

DEMAND FOR PRODUCTION NO. 11:

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

RESPONSE TO DEMAND NO. 11:

Responding party objects that this request is overbroad as to time. This request seeks information that is not relevant to the subject matter of the litigation, and this request is not reasonably calculated to lead to the discovery of admissible evidence.

DEMAND FOR PRODUCTION NO. 12:

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

RESPONSE TO DEMAND NO. 12:

Responding party objects that this request is so overbroad as to scope and time as to be burdensome and harassing. This request seeks information that is not relevant to the subject matter of the litigation, and this request is not reasonably calculated to lead to the discovery of admissible evidence. This request invades responding party's right to privacy.

DEMAND FOR PRODUCTION NO. 13:

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

RESPONSE TO DEMAND NO. 13:

Responding party objects that this request is so overbroad as to scope and time as to be burdensome and harassing. This request seeks information that is not relevant to the subject matter of the litigation, and this request is not reasonably calculated to lead to the discovery of admissible evidence. This request invades responding party's right to privacy.

DEMAND FOR PRODUCTION NO. 14:

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

RESPONSE TO DEMAND NO. 14:

Responding party objects that this request is overbroad as to time.

DEMAND FOR PRODUCTION NO. 15:

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

RESPONSE TO DEMAND NO. 15:

Responding party objects that this request is overbroad as to scope and time. This request seeks information that is not relevant to the subject matter of the litigation, and this request is not reasonably calculated to lead to the discovery of admissible evidence. This request invades

1 responding party's right to privacy.

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

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

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

6 Responding party objects that this request is overbroad as to scope and time. This request
7 seeks information that is not relevant to the subject matter of the litigation, and this request is not
8 reasonably calculated to lead to the discovery of admissible evidence. This request invades
9 responding party's right to privacy.

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

11 All DOCUMENTS evidencing COMMUNICATIONS with Gene Nebeker since January 1,
12 2000.

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

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. Responding party objects
17 that this request falls outside the agreed upon scope of discovery and the issues to be addressed at
18 the August 23, 2022 hearing.

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

20 All DOCUMENTS evidencing COMMUNICATIONS with Jan Hendrix since January 1,
21 2000.

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

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. Responding party objects
26 that this request falls outside the agreed upon scope of discovery and the issues to be addressed at
27 the August 23, 2022 hearing. This request seeks documents protected by the attorney-client
28 privilege and/or the attorney work product doctrine.

DEMAND FOR PRODUCTION NO. 19:

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

RESPONSE TO DEMAND NO. 19:

Responding party objects that this request is overbroad as to scope and time. This request seeks information that is not relevant to the subject matter of the litigation, and this request is not reasonably calculated to lead to the discovery of admissible evidence. This request invades responding party's right to privacy.

DEMAND FOR PRODUCTION NO. 20:

All DOCUMENTS evidencing any claimed overlying right to pump groundwater.

RESPONSE TO DEMAND NO. 20:

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

DEMAND FOR PRODUCTION NO. 21:

YOUR current CV or resume.

RESPONSE TO DEMAND NO. 21:

Responding party objects that this request seeks information that is not relevant to the subject matter of the litigation, and this request is not reasonably calculated to lead to the discovery of admissible evidence.

Dated: May 26, 2022

MATHENY SEARS LINKERT & JAIME, LLP

By: 

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

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:

OBJECTION TO NOTICE OF TAKING DEPOSITION OF PAMELLA ZAMRZLA

☒ **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