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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

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

19  
20 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

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

25 **OBJECTIONS TO DEPOSITION**

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

28 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.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

26 Responding party objects that this request is overbroad as to scope and time. This request  
27 seeks information that is not relevant to the subject matter of the litigation, and this request is not  
28 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.

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

2 All DOCUMENTS evidencing the purchase of water from any source since January 1,  
3 2000.

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

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. This request invades  
8 responding party's right to privacy.

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

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

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

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

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

16 YOUR current CV or resume.

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

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

21 Dated: June 2, 2022

**MATHENY SEARS LINKERT & JAIME, LLP**

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23  
24 By: 

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

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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 June 2, 2022, I served the following documents on the parties in this action described as follows:

**OBJECTION TO NOTICE OF TAKING DEPOSITION OF JEANETTE 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 2nd day of June 2022, at Sacramento, California.

  
Kym Green