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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

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

PROPOUNDING PARTY: SETTLING PARTIES

RESPONDING PARTY: JOHNNY ZAMRZLA

SET NUMBER: Two

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

PRELIMINARY STATEMENT

It should be noted that responding party has not fully completed his investigation of the
facts relating to the case, has not fully completed his discovery in this action, and has not completed
his preparation for trial. All of the answers contained herein are based only upon such information

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. 22:**

21 All DOCUMENTS RELATING TO the Antelope Valley Groundwater Adjudication, JCCP
22 No. 4408.

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

24 Responding party objects that this request is overbroad as to scope and time. This request
25 fails to identify a particularized category of documents. Responding party objects to this request
26 to the extent it seeks documents protected by the attorney-client privilege and/or the attorney work
27 product doctrine. This request seeks documents that are publicly available and thus equally
28 available to propounding party.

DEMAND FOR PRODUCTION NO. 23:

All DOCUMENTS obtained from Norm Hickling.

RESPONSE TO DEMAND NO. 23:

Responding party objects that this request is overbroad as to scope and time. Responding party objects to this request to the extent it seeks documents protected by the attorney-client privilege and/or the attorney work product doctrine. 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. Without waiving said objections, responding party is unable to comply with this request, as it has no responsive documents in its possession, custody, or control.

DEMAND FOR PRODUCTION NO. 24:

All deeds RELATING TO the PROPERTY.

RESPONSE TO DEMAND NO. 24:

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. This request seeks documents that are publicly available and thus equally available to propounding party. This request is duplicative of Request for Production No. 1, previously served on this responding party. Without waiving said objections, please see Z 001262-001264, as well as previously produced documents.

DEMAND FOR PRODUCTION NO. 25:

All title reports RELATING TO the PROPERTY.

RESPONSE TO DEMAND NO. 25:

Responding party objects that this request vague and ambiguous with respect to the term "title reports." 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. This request is duplicative of Request for Production No. 2, previously served on this responding party.

DEMAND FOR PRODUCTION NO. 26:

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

2 **RESPONSE TO DEMAND NO. 26:**

3 Responding party objects that this request is overbroad as to time. This request seeks
4 information that is not relevant to the subject matter of the litigation, and this request is not
5 reasonably calculated to lead to the discovery of admissible evidence. This request seeks
6 documents that are publicly available and thus equally available to propounding party. This request
7 is duplicative of Request for Production No. 3, previously served on this responding party.

8 **DEMAND FOR PRODUCTION NO. 27:**

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

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

12 Responding party objects that this request is so overbroad as to scope and time as to be
13 burdensome and harassing. This request seeks information that is not relevant to the subject matter
14 of the litigation, and this request is not reasonably calculated to lead to the discovery of admissible
15 evidence. This request invades responding party's right to privacy. This request is duplicative of
16 Request for Production No. 4, previously served on this responding party. Without waiving said
17 objections, please see Z 001265-001273, as well as previously produced documents.

18 **DEMAND FOR PRODUCTION NO. 28:**

19 All photographs and video depicting any water well or any portion thereof on the
20 PROPERTY.

21 **RESPONSE TO DEMAND NO. 28:**

22 Responding party objects that this request is overbroad as to time. This request seeks
23 information that is not relevant to the subject matter of the litigation, and this request is not
24 reasonably calculated to lead to the discovery of admissible evidence. This request is duplicative
25 of Request for Production No. 5, previously served on this responding party.

26 **DEMAND FOR PRODUCTION NO. 29:**

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

RESPONSE TO DEMAND NO. 29:

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. This request is duplicative of Request for Production No. 6, previously served on this responding party.

DEMAND FOR PRODUCTION NO. 30:

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

RESPONSE TO DEMAND NO. 30:

Responding party objects that this request vague and ambiguous with respect to the term "limitation, drilling permits, drilling logs, installation, maintenance and repair records." 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 is duplicative of Request for Production No. 7, previously served on this responding party.

DEMAND FOR PRODUCTION NO. 31:

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

RESPONSE TO DEMAND NO. 31:

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, valves 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. This request is duplicative of Request for Production No. 8, previously served on this responding party.

DEMAND FOR PRODUCTION NO. 32:

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

3 **RESPONSE TO DEMAND NO. 32:**

4 Responding party objects that this request is overbroad as to scope and time. This request
5 is duplicative of Request for Production No. 9, previously served on this responding party.

6 **DEMAND FOR PRODUCTION NO. 33:**

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

9 **RESPONSE TO DEMAND NO. 33:**

10 Responding party objects that this request is overbroad as to time. This request seeks
11 information that is not relevant to the subject matter of the litigation, and this request is not
12 reasonably calculated to lead to the discovery of admissible evidence. This request is duplicative
13 of Request for Production No. 10, previously served on this responding party.

14 **DEMAND FOR PRODUCTION NO. 34:**

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

17 **RESPONSE TO DEMAND NO. 34:**

18 Responding party objects that this request is overbroad as to time. This request seeks
19 information that is not relevant to the subject matter of the litigation, and this request is not
20 reasonably calculated to lead to the discovery of admissible evidence. This request is duplicative
21 of Request for Production No. 11, previously served on this responding party.

22 **DEMAND FOR PRODUCTION NO. 35:**

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

26 **RESPONSE TO DEMAND NO. 35:**

27 Responding party objects that this request is so overbroad as to scope and time as to be
28 burdensome and harassing. This request seeks information that is not relevant to the subject matter

1 of the litigation, and this request is not reasonably calculated to lead to the discovery of admissible
2 evidence. This request invades responding party's right to privacy. Based on the above objections,
3 responding party will not comply with this request. Given said objections, responding party invites
4 propounding party to meet and confer concerning the scope of this request. This request is
5 duplicative of Request for Production No. 12, previously served on this responding party.

6 **DEMAND FOR PRODUCTION NO. 36:**

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

9 **RESPONSE TO DEMAND NO. 36:**

10 Responding party objects that this request is so overbroad as to scope and time as to be
11 burdensome and harassing. This request seeks information that is not relevant to the subject matter
12 of the litigation, and this request is not reasonably calculated to lead to the discovery of admissible
13 evidence. This request invades responding party's right to privacy. Based on the above objections,
14 responding party will not comply with this request. Given said objections, responding party invites
15 propounding party to meet and confer concerning the scope of this request. This request is
16 duplicative of Request for Production No. 13, previously served on this responding party.

17 **DEMAND FOR PRODUCTION NO. 37:**

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

20 **RESPONSE TO DEMAND NO. 37:**

21 Responding party objects that this request is overbroad as to time. This request is
22 duplicative of Request for Production No. 14, previously served on this responding party.

23 **DEMAND FOR PRODUCTION NO. 38:**

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

25 **RESPONSE TO DEMAND NO. 38:**

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. This request is duplicative of Request for Production No. 15,
2 previously served on this responding party. Without waiving said objections, please see Z 001274-
3 001305, as well as previously produced documents.

4 **DEMAND FOR PRODUCTION NO. 39:**

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

7 **RESPONSE TO DEMAND NO. 39:**

8 Responding party objects that this request is overbroad as to scope and time. This request
9 seeks 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. This request invades
11 responding party's right to privacy. This request is duplicative of Request for Production No. 16,
12 previously served on this responding party.

13 **DEMAND FOR PRODUCTION NO. 40:**

14 All DOCUMENTS evidencing the amount of groundwater applied to each parcel of
15 PROPERTY since January 1, 2000.

16 **RESPONSE TO DEMAND NO. 40:**

17 Responding party objects that this request vague and ambiguous with respect to the term "the
18 amount of groundwater applied to each parcel." Responding party objects that this request is overbroad
19 as to time. This request seeks documents that are publicly available and thus equally available to
20 propounding party. Without waiving said objections, responding party will comply with this request.
21 Responding party has previously produced all responsive documents in its possession, custody, or
22 control. See also documents produced by Southern California Edison.

23 Dated: August 22, 2022

MATHENY SEARS LINKERT & JAIME, LLP

24 By: 

25 NICHOLAS R. SHEPARD, ESQ., Attorney for
26 Defendants, JOHNNY ZAMRZLA,
27 PAMELLA ZAMRZLA, JOHNNY LEE
28 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 TWO** 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 22 day of August 2022, at Palmdale, California.

JOHNNY ZAMRZLA

By: 

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 August 22, 2022, I served the following documents on the parties in this action described as follows:

JOHNNY ZAMRZLA'S RESPONSES TO SETTling PARTIES' REQUEST FOR PRODUCTION OF DOCUMENTS, SET TWO

☒ **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 22nd day of August 2022, at Sacramento, California.


Kym Green