

EXHIBIT B

1 **PROPOUNDING PARTY:** REBECCA WILLIS
2
3 **RESPONDING PARTY:** EACH PUBLIC WATER SUPPLIER LISTED ON
4 **SET:** THREE
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6 **PRELIMINARY STATEMENT**

7 Pursuant to Code of Civil Procedure section 2030.010, et. seq., Rebecca
8 Willis hereby requests that responding party designate and produce for inspection
9 and copying the documents and video recordings described below that are in or
10 under its possession, custody or control, or that of its attorneys, agents or
11 representatives or to which it has access on February 14, 2011, or within such other
12 as agreed to by these parties, at the offices of Krause, Kalfayan, Benink & Slavens,
13 LLP, 625 Broadway, Suite 635, San Diego, California 92101. Alternatively, copies
14 may be made of all of the requested documents and forwarded to the offices of
15 Krause, Kalfayan, Benink & Slavens, LLP, 625 Broadway, Suite 635, San Diego,
16 California 92101 by that date. .

17 Defendants further request that Defendant respond in writing to this
18 document request within thirty (30) days from the date of service of these requests
19 as required by section 2031.210 of the Code of Civil Procedure. Please note section
20 2031.210 requires Defendant to state in writing as to each request:

21 (a) Whether there are documents responsive to the request and whether
22 they will be produced;

23 (b) Whether Defendant lacks the ability to comply with the request or a
24 particular item or category in accordance with section 2031.210(a)(2) of the Code of
25 Civil Procedure; or

26 (c) Whether there are documents responsive to the request but Defendant
27 refuses to produce them because of a claim of privilege or some other objection.

28 With respect to each document, if any, that you withhold from production,

1 state the basis of your refusal to produce it by:

2 (d) Identifying with particularity any document falling within any
3 category of item in the demand to which an objection is being made; and

4 (e) Setting forth clearly the extent of, and the specific ground for, the
5 objection. If an objection is based on a claim of privilege, the particular privilege
6 invoked shall be stated. If an objection is based on a claim that the document
7 sought is protected work product, that claim shall be expressly asserted.

8 If any document is withheld under a claim of privilege or work product,
9 please set forth the following information, pursuant to section 2031.230 of the Code
10 of Civil Procedure, with respect to each document:

11 (f) The identity of the person who created the document and, to the extent
12 it differs, the identity of any person who signed the document or over whose name it
13 was sent or issued;

14 (g) The identity of the person or entity to whom the document was sent or
15 directed;

16 (h) A description of the type and the subject matter of the document with
17 sufficient particularity to enable the court and the parties to identify the document;

18 (i) The date of the document;

19 (j) The identity of the person or persons who has or have custody,
20 possession or control of the original of the document and each copy thereof;

21 (k) The identity of the person that received a copy of the document and his
22 or her employer and job title at the time he or she obtained the document;

23 (l) The number of pages of the document;

24 (m) The basis for the claim of privilege; and

25 (n) Whether any non-privileged matter is included in the document and, if
26 so, a description of the nature of the non-privileged matter and an identification of
27 the portion of the document that contains such non-privileged matter.

28 To the extent necessary to preserve a privilege, please produce any

1 responsive in redacted form.

2 DEFINITIONS

3 1. "DOCUMENTS" shall mean and include any record or communication
4 which would be a writing within the meaning of Section 250 of the California
5 Evidence Code and shall include, without limitation, any written, printed, typed,
6 photostatic, photographed, recorded, computer-generated, computer-stored, or
7 otherwise maintained or reproduced communication or representation, any data
8 compilation in any form, whether comprised of letters, words, numbers, pictures,
9 sounds, bytes, e-mails, electronic signals or impulses, electronic data, active files,
10 deleted files, file fragments, or any combination thereof including, without
11 limitation, all memoranda, notes, records, letters, envelopes, telegrams, messages,
12 studies, analyses, contracts, agreements, projections, estimates, working papers,
13 accounts, analytical records, reports and/or summaries investigations, opinions or
14 reports of consultants, opinions or reports of experts, opinions or reports of
15 accountants, other reports, trade letters, press releases, comparisons, books, diaries,
16 articles, magazines, newspapers, booklets, brochures, pamphlets, circulars,
17 bulletins, notices, forecasts, drawings, diagrams, instructions, minutes of meetings
18 or communications of any type, including inter- and intra-office communications,
19 questionnaires, surveys, charts, graphs, photographs, phonographs, films, tapes,
20 discs, data cells, drums, printouts, all other compiled data which can be obtained
21 (translated, if necessary, through intermediary or other devices into usable forms),
22 documents maintained on, stored in or generated on any electronic transfer or
23 storage system, any preliminary versions, drafts or revisions of any of the foregoing,
24 and other writings or documents of whatever description or kind, whether produced
25 or authorized by or on behalf of you or anyone else, and shall include all non-
26 identical copies and drafts of any of the foregoing now in the possession, custody or
27 control of Defendant.

28 2. "YOU" or "YOUR" shall refer to Defendant and/or his partners, agents,

1 attorneys, and all other representatives.

2 3. "RELEVANT PERIOD" means from November 1, 2006 through the present.

3 **REQUESTS FOR PRODUCTION OF DOCUMENTS**

4

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

6 Any and all Bills you have received from any counsel during the RELEVANT
7 PERIOD relating to this litigation.

8

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

9

10 Any and all DOCUMENTS that refer or relate to the rates billed by your counsel
11 for their services in this matter.

12

12 **REQUEST FOR PRODUCTION NO. 3:**

13

13 Any and all documents that refer or relate to the accompanying special
14 interrogatories.

15

15 **REQUEST FOR PRODUCTION NO. 4:**

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17 Any and all documents that refer or relate to any arrangements whereby YOU
18 have shared responsibility for the payment of counsel fees with respect to this
19 litigation.

20

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Dated: January 11, 2011

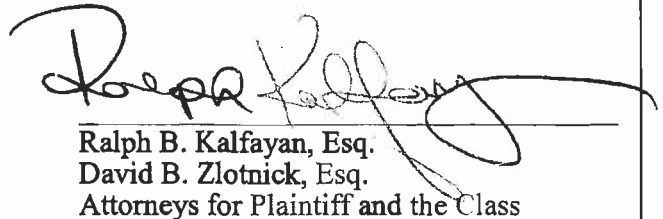
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KRAUSE KALFAYAN BENINK

23

& SLAVENS LLP

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Ralph B. Kalfayan, Esq.
David B. Zlotnick, Esq.
Attorneys for Plaintiff and the Class

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EXHIBIT 1

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EXHIBIT 1

Public Water Suppliers:

1. Los Angeles County Waterworks District No. 40;
2. Palmdale Water District;
3. Littlerock Creek Irrigation District;
4. Palm Ranch Irrigation District;
5. Quartz Hill Water District;
6. Rosamond Community Service District;
7. California Water Service Company;
8. North Edwards Water District;
9. Desert Lakes Community Services District;
10. Phelan Pinon Hills Community Services District;
11. City of Palmdale; and
12. City of Lancaster.

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David B. Zlotnick, SBN 195607
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& SLAVENS LLP
3 625 Broadway, Suite 635
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5 Attorneys for Plaintiff and the Class
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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

**ANTELOPE VALLEY
GROUNDWATER CASES**

This Pleading Relates to Included Action:
REBECCA LEE WILLIS, on behalf of herself
and all others similarly situated,

Plaintiff,

vs.

LOS ANGELES COUNTY WATERWORKS
DISTRICT NO. 40; CITY OF LANCASTER;
CITY OF LOS ANGELES; CITY OF
PALMDALE; PALMDALE WATER
DISTRICT; LITTLEROCK CREEK
IRRIGATION DISTRICT; PALM RANCH
IRRIGATION DISTRICT; QUARTZ HILL
WATER DISTRICT; ANTELOPE VALLEY
WATER CO.; ROSAMOND COMMUNITY
SERVICE DISTRICT; MOJAVE PUBLIC
UTILITY DISTRICT; and DOES 1 through
1,000;

Defendants.

) RELATED CASE TO JUDICIAL
) COUNCIL COORDINATION
) PROCEEDING NO. 4408
)
)
) PLAINTIFF REBECCA WILLIS'
) SPECIAL INTERROGATORIES
) PROPOUNDED ON EACH PUBLIC
) WATER SUPPLIER LISTED ON
) EXHIBIT 1 (THIRD SET)

1 **PROPOUNDING PARTY:** REBECCA WILLIS

2
3 **RESPONDING PARTY:** EACH CROSS-COMPLAINING PUBLIC WATER
4 SUPPLIER LISTED ON EXHIBIT 1

5
6 **SET:** THREE

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8 **PRELIMINARY STATEMENT**

9 Pursuant to Code of Civil Procedure section 2030.010, et. seq., Rebecca Willis
10 hereby requests that responding party answers under oath the following Special
11 Interrogatories [Set Three] within thirty (30) days of service.

12 **DEFINITIONS**

13 (a) **YOU and YOUR** includes you, the responding party, your agents, your
14 employees, your consultants, their agents, their employees, your attorneys, your
15 accountants, your investigators, and anyone else acting on your behalf.

16 (b) **RELEVANT PERIOD** includes November 1, 2006 through the
17 present.

18 (c) **THE LITIGATION** refers to the Antelope Valley Groundwater Cases.

19 **SPECIAL INTERROGATORIES**

20 **SPECIAL INTERROGATORY NO. 1:**

21
22 State the total amount you have been billed by any counsel for its services in
23 this matter during the RELEVANT PERIOD, broken down on a monthly or other
24 applicable periodic basis.

25 **SPECIAL INTERROGATORY NO. 2:**

26
27 State the number of hours billed by YOUR counsel on this matter during the
28 RELEVANT PERIOD, broken down on a monthly or other applicable periodic basis.

1 **SPECIAL INTERROGATORY NO. 3:**

2 State the number of hours that your in-house counsel has worked on this
3 matter during the RELEVANT PERIOD, broken down on a monthly or other
4 applicable periodic basis.
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6 **SPECIAL INTERROGATORY NO. 4:**

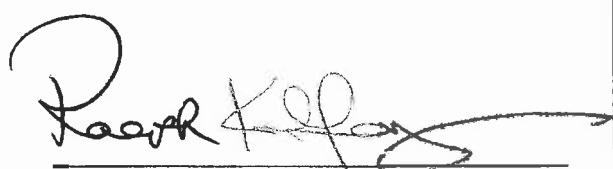
7 State the total amount you have paid for legal services rendered in this
8 matter during the RELEVANT PERIOD, broken down on a monthly or other
9 applicable periodic basis.
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11 **SPECIAL INTERROGATORY NO. 5:**

12 State the billing rate(s) you have paid counsel for their work on this matter
13 during the RELEVANT PERIOD, identifying the extent to which, if at all that rate
14 is a discounted rate.
15

16 Dated: January 11, 2011

KRAUSE KALFAYAN BENINK
& SLAVENS LLP

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19 

Ralph B. Kalfayan, Esq.
David B. Zlotnick, Esq.
Attorneys for Plaintiff and the Class

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EXHIBIT 1

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Public Water Suppliers:

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3. Littlerock Creek Irrigation District;
4. Palm Ranch Irrigation District;
5. Quartz Hill Water District;
6. Rosamond Community Service District;
7. California Water Service Company;
8. North Edwards Water District;
9. Desert Lakes Community Services District;
10. Phelan Pinon Hills Community Services District;
11. City of Palmdale; and
12. City of Lancaster.

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5 Attorneys for Plaintiff and the Class

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

REBECCA LEE WILLIS, on behalf of herself)
and all others similarly situated,)
Plaintiff,)
vs.)
LOS ANGELES COUNTY WATERWORKS)
DISTRICT NO. 40; CITY OF LANCASTER;)
CITY OF LOS ANGELES; CITY OF)
PALMDALE; PALMDALE WATER)
DISTRICT; LITTLEROCK CREEK)
IRRIGATION DISTRICT; PALM RANCH)
IRRIGATION DISTRICT; QUARTZ HILL)
WATER DISTRICT; ANTELOPE VALLEY)
WATER CO.; ROSAMOND COMMUNITY)
SERVICE DISTRICT; MOJAVE PUBLIC)
UTILITY DISTRICT; CALIFORNIA)
WATER SERVICE COMPANY; DESERT)
LAKE COMMUNITY SERVICES)
DISTRICT; NORTH EDWARDS WATER)
DISTRICT; and DOES 4 through 1,000,)
Defendants.

JUDICIAL COUNCIL COORDINATION
PROCEEDING No. 4408
Santa Clara Case No. 1-05-CDV-049053
Assigned to The Honorable Jack Komar

PROOF OF SERVICE

I, Erica Stewart, declare:

I am a resident of the State of California and over the age of eighteen years, and not a party to the within action; my business address is 625 Broadway, Suite 635, San Diego, California, 92101. On **January 11, 2011**, I served the within document(s):

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1. **PLAINTIFF REBECCA WILLIS' THIRD SET OF REQUESTS FOR PRODUCTION OF DOUMENTS PROPOUNDED ON EACH PUBLIC WATER SUPPLIER LISTED ON EXHIBIT 1; and**

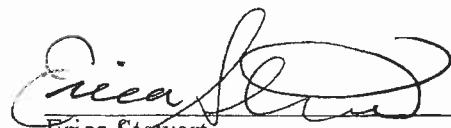
2. **PLAINTIFF REBECCA WILLIS' SPECIAL INTERROGATORIES PROPOUNDED ON EACH PUBLIC WATER SUPPLIER LISTED ON EXHIBIT 1 (THIRD SET).**

- by posting the document(s) listed above to the Santa Clara County Superior Court website in regard to the Antelope Valley Groundwater matter.
- by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at San Diego, California addressed as set forth below:
- by causing personal delivery by Cal Express of the document(s) listed above to the person(s) at the address(es) set forth below.
- by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.
- I caused such envelope to be delivered via overnight delivery addressed as indicated on the attached service list. Such envelope was deposited for delivery by UPS following the firm's ordinary business practices.

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with the postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on **January 11, 2011**, at San Diego, California.


Erica Stewart