

EXHIBIT C

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6 Attorney for Quartz Hill Water District
7 Defendant/Cross Complainant

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF LOS ANGELES-CENTRAL DISTRICT

10 ANTELOPE VALLEY GROUNDWATER
11 CASES

12 Included Actions:

13 Los Angeles County Waterworks District No.
14 40 v. Diamond Farming Co.
15 Superior Court of California, County of Los
16 Angeles, Case No. BC325201;

17 Los Angeles County Waterworks District
18 No. 40 v. Diamond Farming Co.
19 Superior Court of California
20 County of Kern, Case No. S-1500-CV-254-
21 348;

22 Wm. Bolthouse Farms, Inc. v. City of
23 Lancaster
24 Diamond Farming Co. v. City of Lancaster
25 Diamond Farming Co. v. Palmdale Water Dist.
26 Superior Court of California
27 County of Riverside, consolidated actions
28 Case Nos. RIC 353840, RIC 344436,
RIC 344668.

**Judicial Council Coordination Proceeding No.
4408**

Santa Clara Case No. 1-05-CV-049053
Assigned to the Honorable Jack Komar Dept. 1

**RESPONSE TO REQUESTS FOR
PRODUCTION OF DOCUMENTS BY
REBECCA WILLIS**

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4408

Santa Clara Case No. 1-05-CV-049053
Assigned to the Honorable Jack Komar Dept. I

RESPONSE TO REQUESTS FOR
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COUNTY COUNSEL
- 24 Warren Wellen, Bar No. 139152
PRINCIPAL DEPUTY COUNTY COUNSEL
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Los Angeles, CA 90012
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1 Attorneys for Los Angeles County Waterworks District No. 40

2 MURPHY & EVERTZ

3 Douglas J. Evertz

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6 Phone: (714) 277-1700 Fax: (714) 277-1777

7 Attorneys for City of Lancaster and Rosamond Community Services District

8 SMITHTRAGER LLP

9 Susan Trager

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11 Irvine, CA 92612

12 Phone: 949-752-8971 Fax: 949-863-9804

13 Attorneys for Phelan Pinon Hills Community Services District

14 ALESHIRE & WYNDER, LLP

15 Wesley Miliband

16 18881 Von Karman Ave., Ste. 400

17 Irvine, CA 92612

18 Phone: 949-223-1170 Fax: 949-223-1180

19 Attorneys for Phelan Pinon Hills Community Services District

20 PROPOUNDING PARTY: Rebecca Willis

21 RESPONDING PARTY: Los Angeles County Waterworks District No. 40; Palmdale Water

22 District; Littlerock Creek Irrigation District; Palm Ranch Irrigation District; Quartz Hill Water

23 District; Rosamond Community Service District; California Water Service Company; North

24 Edwards Water District; Desert Lakes Community Services District; Phelan Pinon Hills

25 Community Services District; City of Palmdale; and City of Lancaster

26 SET NO.: Three

27 **PRELIMINARY STATEMENT**

28 It should be noted that Responding Party has not fully completed its investigation of the facts relating to this case, has not fully completed its discovery in this action and has not completed its preparation for trial. All the responses contained herein are based only upon such information and documents which are presently available to and specifically known by

1 Responding Party and discloses only those contentions which are presently known to Responding
2 Party. It is anticipated that further discovery, independent investigation, legal research and
3 analysis will supply additional facts, and add meaning to the known facts, as well as establish
4 entirely new factual conclusions and legal contentions, all of which may lead to substantial
5 additions to, changes in, and variations from the responses herein set forth. The responses herein
6 are given without prejudice to Responding Party's right to produce evidence of any subsequently
7 discovered fact or facts which this Responding Party may later recall. Responding Party
8 accordingly reserves the right to change any and all responses herein as additional facts are
9 ascertained, analyses made, legal research is completed and contentions are made. Responding
10 Party further reserves the right to offer, at time of trial, facts, testimony or other evidence
11 discovered subsequent to and not included in this response, and assumes no obligation to
12 voluntarily supplement or amend this response to reflect such facts, testimony or other evidence.

13 The responses contained herein are made in a good faith effort to supply as much factual
14 information and as much specification of legal contentions as are presently known and available
15 but should in no way lead to the prejudice of Responding Party in relation to further discovery
16 research, or analysis.

17 Responding Party does not concede the relevancy or materiality of any request, or of the
18 subject to which such request refers.

19 Each response is made subject to all objections as to competence, relevance, materiality,
20 propriety, admissibility, attorney-client privilege, attorney work product doctrine, and the
21 deliberative process privilege, as well as any or all other objections and grounds which would
22 require exclusion of evidence. Responding Party reserves the right to make any and all such
23 objections at trial and at any other proceeding relating to this action.

24 The specific responses and objections given below are submitted without prejudice to, and
25 without waiving, any of these objections even though the general objections are not expressly set
26 forth in each response.

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1 Objection, to the extent the request calls for a response from the City of Lancaster and City
2 of Palmdale, the request calls for irrelevant information and is not likely to adduce relevant
3 information.

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

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

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 2:**

8 Pursuant to Evidence Code section 917 all communications between a lawyer and client are
9 presumed to be made in confidence and pursuant to Business and Professions Code section 6149 a
10 fee contract between a lawyer and client is a confidential communication within the meaning of
11 subdivision (e) of Section 6068 and of Section 952 of the Evidence Code. Pursuant to Business
12 and Professions Code section 6068(e)(1) an attorney must maintain inviolate the confidence, and
13 at every peril to himself or herself to preserve the secrets, of his or her client.

14 The documents requested are information from a lawyer to a client transmitted in the
15 course of that relationship and in confidence and are therefore “confidential communication
16 between client and lawyer.” (Evidence Code sections 951 – 953). Pursuant to Evidence Code
17 section 954, Responding Party has the privilege to refuse to disclose the requested confidential
18 communication. Pursuant to Evidence Code section 955, a lawyer who made a communication
19 subject to the privilege shall claim the privilege whenever the communication is sought to be
20 disclosed.

21 Accordingly, pursuant to Evidence Code section 954 and Business and Professions Code
22 section 6068(e), Responding Party objects to this request based upon the attorney-client privilege
23 and attorney work product (Los Angeles Bar Ass'n Form. Opns. 456(1989)).

24 Objection, the request all documents that refer or relate to rates billed is burdensome and
25 overbroad.

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1 Objection, the term “relevant period” calls for the disclosure of irrelevant information
2 because it includes a request for information that does not relate to Rebecca Willis participation in
3 the *Antelope Valley Groundwater Cases*, Judicial Council Coordination Proceeding No. 4408.

4 Objection, to the extent the request calls for a response from the City of Lancaster and City
5 of Palmdale, the request calls for irrelevant information and is not likely to adduce relevant
6 information.

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

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

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 3:**

10 Pursuant to Evidence Code section 917 all communications between a lawyer and client are
11 presumed to be made in confidence and pursuant to Business and Professions Code section 6149 a
12 fee contract between a lawyer and client is a confidential communication within the meaning of
13 subdivision (e) of Section 6068 and of Section 952 of the Evidence Code. Pursuant to Business
14 and Professions Code section 6068(e)(1) an attorney must maintain inviolate the confidence, and
15 at every peril to himself or herself to preserve the secrets, of his or her client.

16 The documents requested are information from a lawyer to a client transmitted in the
17 course of that relationship and in confidence and are therefore “confidential communication
18 between client and lawyer.” (Evidence Code sections 951 – 953). Pursuant to Evidence Code
19 section 954, Responding Party has the privilege to refuse to disclose the requested confidential
20 communication. Pursuant to Evidence Code section 955, a lawyer who made a communication
21 subject to the privilege shall claim the privilege whenever the communication is sought to be
22 disclosed.

23 Accordingly, pursuant to Evidence Code section 954 and Business and Professions Code
24 section 6068(e), Responding Party objects to this request based upon the attorney-client privilege
25 and attorney work product (Los Angeles Bar Ass'n Form. Opns. 456(1989)).

26 Objection, the request all documents that refer or relate to other interrogatories is
27 burdensome and overbroad.

28

1 Objection, the term “relevant period” calls for the disclosure of irrelevant information
2 because it includes a request for information that does not relate to Rebecca Willis participation in
3 the *Antelope Valley Groundwater Cases*, Judicial Council Coordination Proceeding No. 4408.

4 Objection, to the extent the request calls for a response from the City of Lancaster and City
5 of Palmdale, the request calls for irrelevant information and is not likely to adduce relevant
6 information.

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

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

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 4:**

11 Pursuant to Evidence Code section 917 all communications between a lawyer and client are
12 presumed to be made in confidence and pursuant to Business and Professions Code section 6149 a
13 fee contract between a lawyer and client is a confidential communication within the meaning of
14 subdivision (e) of Section 6068 and of Section 952 of the Evidence Code. Pursuant to Business
15 and Professions Code section 6068(e)(1) an attorney must maintain inviolate the confidence, and
16 at every peril to himself or herself to preserve the secrets, of his or her client.

17 The documents requested are information from a lawyer to a client transmitted in the
18 course of that relationship and in confidence and are therefore “confidential communication
19 between client and lawyer.” (Evidence Code sections 951 – 953). Pursuant to Evidence Code
20 section 954, Responding Party has the privilege to refuse to disclose the requested confidential
21 communication. Pursuant to Evidence Code section 955, a lawyer who made a communication
22 subject to the privilege shall claim the privilege whenever the communication is sought to be
23 disclosed.

24 Accordingly, pursuant to Evidence Code section 954 and Business and Professions Code
25 section 6068(e), Responding Party objects to this request based upon the attorney-client privilege
26 and attorney work product (Los Angeles Bar Ass'n Form.Opins. 456(1989)).

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LAW OFFICES OF
BEST BEST & KRIEGER LLP
5 PARK PLAZA, SUITE 1500
IRVINE, CALIFORNIA 92614

PROOF OF SERVICE

I, Stefanie D. Hedlund, 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 Best Best & Krieger LLP, 400 Capitol Mall, Suite 1650, Sacramento, California 95814. On February, 2011, I served the within document(s):

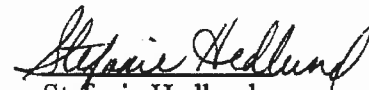
RESPONSE TO REQUESTS FOR PRODUCTION OF DOCUMENTS BY REBECCA WILLIS

- 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 Irvine, California addressed as set forth below.
- by causing personal delivery by ASAP Corporate Services 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 Federal Express 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 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 February 14, 2011, at Truckee, California.


Stefanie Hedlund

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6 Attorney for Quartz Hill Water District
7 Defendant/Cross Complainant

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
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10 ANTELOPE VALLEY GROUNDWATER
11 CASES

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21 348;

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28 Case Nos. RIC 353840, RIC 344436,
RIC 344668.

**Judicial Council Coordination Proceeding No.
4408**

Santa Clara Case No. 1-05-CV-049053
Assigned to the Honorable Jack Komar Dept. 1

**RESPONSE TO SPECIAL
INTERROGATORIES BY REBECCA WILLIS**

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18 Attorneys for Phelan Pinon Hills Community Services District

19 PROPOUNDING PARTY: Rebecca Willis

20 RESPONDING PARTY: Los Angeles County Waterworks District No. 40; Palmdale Water
21 District; Littlerock Creek Irrigation District; Palm Ranch Irrigation District; Quartz Hill Water
22 District; Rosamond Community Service District; California Water Service Company; North
23 Edwards Water District; Desert Lakes Community Services District; Phelan Pinon Hills
24 Community Services District; City of Palmdale; and City of Lancaster

25 SET NO.: Three

26
27 Los Angeles County Waterworks District No. 40; Palmdale Water District; Littlerock
28 Creek Irrigation District; Palm Ranch Irrigation District; Quartz Hill Water District; Rosamond
Community Service District; California Water Service Company; North Edwards Water District;
Desert Lakes Community Services District; Phelan Pinon Hills Community Services District; City
of Palmdale; and City of Lancaster ("Responding Party"), hereby responds as follows to Rebecca
Willis ("Propounding Party") interrogatories.

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PRELIMINARY STATEMENT

It should be noted that Responding Party has not fully completed its investigation of the facts relating to this case, has not fully completed its discovery in this action and has not completed its preparation for trial. All the responses contained herein are based only upon such information and documents which are presently available to and specifically known by Responding Party and discloses only those contentions which are presently known to Responding Party. It is anticipated that further discovery, independent investigation, legal research and analysis will supply additional facts, and add meaning to the known facts, as well as establish entirely new factual conclusions and legal contentions, all of which may lead to substantial additions to, changes in, and variations from the responses herein set forth. The responses herein are given without prejudice to Responding Party's right to produce evidence of any subsequently discovered fact or facts which this Responding Party may later recall. Responding Party accordingly reserves the right to change any and all responses herein as additional facts are ascertained, analyses made, legal research is completed and contentions are made. Responding Party further reserves the right to offer, at time of trial, facts, testimony or other evidence discovered subsequent to and not included in this response, and assumes no obligation to voluntarily supplement or amend this response to reflect such facts, testimony or other evidence.

The responses contained herein are made in a good faith effort to supply as much factual information and as much specification of legal contentions as are presently known and available but should in no way lead to the prejudice of Responding Party in relation to further discovery, research, or analysis.

Responding Party does not concede the relevancy or materiality of any request, or of the subject to which such request refers.

Each response is made subject to all objections as to competence, relevance, materiality, propriety, admissibility, attorney-client privilege, attorney work product doctrine, and the deliberative process privilege, as well as any or all other objections and grounds which would

1 require exclusion of evidence. Responding Party reserves the right to make any and all such
2 objections at trial and at any other proceeding relating to this action.

3 The specific responses and objections given below are submitted without prejudice to, and
4 without waiving, any of these objections even though the general objections are not expressly set
5 forth in each response.

6
7 **RESPONSES TO SPECIAL INTERROGATORIES**

8
9 **SPECIAL INTERROGATORY NO. 1:**

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

12 **RESPONSE TO SPECIAL INTERROGATORY NO. 1:**

13 Pursuant to Evidence Code section 917 all communications between a lawyer and client are
14 presumed to be made in confidence and pursuant to Business and Professions Code section 6149 a
15 fee contract between a lawyer and client is a confidential communication within the meaning of
16 subdivision (e) of Section 6068 and of Section 952 of the Evidence Code. Pursuant to Business
17 and Professions Code section 6068(e)(1) an attorney must maintain inviolate the confidence, and
18 at every peril to himself or herself to preserve the secrets, of his or her client.

19 The documents requested are information from a lawyer to a client transmitted in the
20 course of that relationship and in confidence and are therefore "confidential communication
21 between client and lawyer." (Evidence Code sections 951 – 953). Pursuant to Evidence Code
22 section 954, Responding Party has the privilege to refuse to disclose the requested confidential
23 communication. Pursuant to Evidence Code section 955, a lawyer who made a communication
24 subject to the privilege shall claim the privilege whenever the communication is sought to be
25 disclosed.

26 Accordingly, pursuant to Evidence Code section 954 and Business and Professions Code
27 section 6068(e), Responding Party objects to this request based upon the attorney-client privilege
28 and attorney work product (Los Angeles Bar Ass'n Form. Opns. 456(1989)).

1 Objection, this request exceeds the number of specially prepared interrogatories allowed by
2 Code of Civil Procedure section 2030.030(a)(1).

3 Objection, this request fails capitalize all specially defined terms, or indicate that the
4 specially defined term is used, in violation of Code of Civil Procedure section 2030.060(e).

5 Objection, the definition of “billed,” the definition of “matter,” and the definition of “other
6 applicable periodic” is not defined and “litigation” is defined, but not used, and is therefore
7 substantially likely to lead to confusion and the adducement of irrelevant evidence, as such the
8 Interrogatory is vague, ambiguous and unintelligible.

9 Objection, the request that the response be broken down into a monthly or other basis is
10 burdensome and overbroad.

11 Objection, the term “relevant period” calls for the disclosure of irrelevant information
12 because it includes a request for information that does not relate to Rebecca Willis participation in
13 the *Antelope Valley Groundwater Cases*, Judicial Council Coordination Proceeding No. 4408.

14 Objection, to the extent the request calls for a response from the City of Lancaster and City
15 of Palmdale, the request calls for irrelevant information and is not likely to adduce relevant
16 information.

17 **SPECIAL INTERROGATORY NO. 2:**

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

20 **RESPONSE TO SPECIAL INTERROGATORY NO. 2:**

21 Pursuant to Evidence Code section 917 all communications between a lawyer and client are
22 presumed to be made in confidence and pursuant to Business and Professions Code section 6149 a
23 fee contract between a lawyer and client is a confidential communication within the meaning of
24 subdivision (e) of Section 6068 and of Section 952 of the Evidence Code. Pursuant to Business
25 and Professions Code section 6068(e)(1) an attorney must maintain inviolate the confidence, and
26 at every peril to himself or herself to preserve the secrets, of his or her client.

27 The documents requested are information from a lawyer to a client transmitted in the
28 course of that relationship and in confidence and are therefore “confidential communication

1 between client and lawyer.” (Evidence Code sections 951 – 953). Pursuant to Evidence Code
2 section 954, Responding Party has the privilege to refuse to disclose the requested confidential
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4 subject to the privilege shall claim the privilege whenever the communication is sought to be
5 disclosed.

6 Accordingly, pursuant to Evidence Code section 954 and Business and Professions Code
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8 and attorney work product (Los Angeles Bar Ass'n Form. Opns. 456(1989)).

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10 Code of Civil Procedure section 2030.030(a)(1).

11 Objection, this request fails capitalize all specially defined terms, or indicate that the
12 specially defined term is used, in violation of Code of Civil Procedure section 2030.030(e).

13 Objection, the definition of “billed,” the definition of “matter,” and the definition of “other
14 applicable periodic” is not defined and “litigation” is defined, but not used, and is therefore
15 substantially likely to lead to confusion and the adducement of irrelevant evidence, as such the
16 Interrogatory is vague, ambiguous and unintelligible.

17 Objection, the request that the response be broken down into a monthly or other basis is
18 burdensome and overbroad.

19 Objection, the term “relevant period” calls for the disclosure of irrelevant information
20 because it includes a request for information that does not relate to Rebecca Willis participation in
21 the *Antelope Valley Groundwater Cases*, Judicial Council Coordination Proceeding No. 4408.

22 Objection, to the extent the request calls for a response from the City of Lancaster and City
23 of Palmdale, the request calls for irrelevant information and is not likely to adduce relevant
24 information.

25 **SPECIAL INTERROGATORY NO. 3:**

26 State the number of hours that your in-house counsel has worked on this matter during the
27 RELEVANT PERIOD, broken down on a monthly or other applicable periodic basis.

28 **RESPONSE TO SPECIAL INTERROGATORY NO. 3:**

1 Pursuant to Evidence Code section 917 all communications between a lawyer and client are
2 presumed to be made in confidence and pursuant to Business and Professions Code section 6149 a
3 fee contract between a lawyer and client is a confidential communication within the meaning of
4 subdivision (e) of Section 6068 and of Section 952 of the Evidence Code. Pursuant to Business
5 and Professions Code section 6068(e)(1) an attorney must maintain inviolate the confidence, and
6 at every peril to himself or herself to preserve the secrets, of his or her client.

7 The documents requested are information from a lawyer to a client transmitted in the
8 course of that relationship and in confidence and are therefore “confidential communication
9 between client and lawyer.” (Evidence Code sections 951 – 953). Pursuant to Evidence Code
10 section 954, Responding Party has the privilege to refuse to disclose the requested confidential
11 communication. Pursuant to Evidence Code section 955, a lawyer who made a communication
12 subject to the privilege shall claim the privilege whenever the communication is sought to be
13 disclosed.

14 Accordingly, pursuant to Evidence Code section 954 and Business and Professions Code
15 section 6068(e), Responding Party objects to this request based upon the attorney-client privilege
16 and attorney work product (Los Angeles Bar Ass'n Form.Ops. 456(1989)).

17 Objection, this request exceeds the number of specially prepared interrogatories allowed by
18 Code of Civil Procedure section 2030.030(a)(1).

19 Objection, this request fails capitalize all specially defined terms, or indicate that the
20 specially defined term is used, in violation of Code of Civil Procedure section 2030.030(e).

21 Objection, assumes facts not in evidence, that Responding Party has an in-house counsel,
22 that the in-house counsel (if any) has worked on this matter, or that the in-house counsel (if any)
23 has tracked the time spent working on the matter.

24 Objection, the definition of “matter” and the definition of “other applicable periodic” is not
25 defined and “litigation” is defined, but not used, and is therefore substantially likely to lead to
26 confusion and the adducement of irrelevant evidence, as such the Interrogatory is vague,
27 ambiguous and unintelligible.

28

1 Objection, the request that the response be broken down into a monthly or other basis is
2 burdensome and overbroad.

3 Objection, the term "relevant period" calls for the disclosure of irrelevant information
4 because it includes a request for information that does not relate to Rebecca Willis participation in
5 the *Antelope Valley Groundwater Cases*, Judicial Council Coordination Proceeding No. 4408.

6 Objection, to the extent the request calls for a response from the City of Lancaster and City
7 of Palmdale, the request calls for irrelevant information and is not likely to adduce relevant
8 information.

9 **SPECIAL INTERROGATORY NO. 4:**

10 State the total amount you have paid for legal services rendered in this matter during the
11 RELEVANT PERIOD, broken down on a monthly or other applicable periodic basis.

12 **RESPONSE TO SPECIAL INTERROGATORY NO. 4:**

13 Pursuant to Evidence Code section 917 all communications between a lawyer and client are
14 presumed to be made in confidence and pursuant to Business and Professions Code section 6149 a
15 fee contract between a lawyer and client is a confidential communication within the meaning of
16 subdivision (e) of Section 6068 and of Section 952 of the Evidence Code. Pursuant to Business
17 and Professions Code section 6068(e)(1) an attorney must maintain inviolate the confidence, and
18 at every peril to himself or herself to preserve the secrets, of his or her client.

19 The documents requested are information from a lawyer to a client transmitted in the
20 course of that relationship and in confidence and are therefore "confidential communication
21 between client and lawyer." (Evidence Code sections 951 – 953). Pursuant to Evidence Code
22 section 954, Responding Party has the privilege to refuse to disclose the requested confidential
23 communication. Pursuant to Evidence Code section 955, a lawyer who made a communication
24 subject to the privilege shall claim the privilege whenever the communication is sought to be
25 disclosed.

26 Accordingly, pursuant to Evidence Code section 954 and Business and Professions Code
27 section 6068(e), Responding Party objects to this request based upon the attorney-client privilege
28 and attorney work product (Los Angeles Bar Ass'n Form. Opns. 456(1989)).

1 Objection, this request exceeds the number of specially prepared interrogatories allowed by
2 Code of Civil Procedure section 2030.030(a)(1).

3 Objection, this request fails capitalize all specially defined terms, or indicate that the
4 specially defined term is used, in violation of Code of Civil Procedure section 2030.030(e).

5 Objection, the definition of “matter” and the definition of “other applicable periodic” is not
6 defined and “litigation” is defined, but not used, and is therefore substantially likely to lead to
7 confusion and the adducement of irrelevant evidence, as such the Interrogatory is vague,
8 ambiguous and unintelligible.

9 Objection, the request that the response be broken down into a monthly or other basis is
10 burdensome and overbroad.

11 Objection, the term “relevant period” calls for the disclosure of irrelevant information
12 because it includes a request for information that does not relate to Rebecca Willis participation in
13 the *Antelope Valley Groundwater Cases*, Judicial Council Coordination Proceeding No. 4408.

14 Objection, to the extent the request calls for a response from the City of Lancaster and City
15 of Palmdale, the request calls for irrelevant information and is not likely to adduce relevant
16 information.

17 **SPECIAL INTERROGATORY NO. 5:**

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

20 **RESPONSE TO SPECIAL INTERROGATORY NO. 5:**

21 Pursuant to Evidence Code section 917 all communications between a lawyer and client are
22 presumed to be made in confidence and pursuant to Business and Professions Code section 6149 a
23 fee contract between a lawyer and client is a confidential communication within the meaning of
24 subdivision (e) of Section 6068 and of Section 952 of the Evidence Code. Pursuant to Business
25 and Professions Code section 6068(e)(1) an attorney must maintain inviolate the confidence, and
26 at every peril to himself or herself to preserve the secrets, of his or her client.

27 The documents requested are information from a lawyer to a client transmitted in the
28 course of that relationship and in confidence and are therefore “confidential communication

1 between client and lawyer.” (Evidence Code sections 951 – 953). Pursuant to Evidence Code
2 section 954, Responding Party has the privilege to refuse to disclose the requested confidential
3 communication. Pursuant to Evidence Code section 955, a lawyer who made a communication
4 subject to the privilege shall claim the privilege whenever the communication is sought to be
5 disclosed.

6 Accordingly, pursuant to Evidence Code section 954 and Business and Professions Code
7 section 6068(e), Responding Party objects to this request based upon the attorney-client privilege
8 and attorney work product (Los Angeles Bar Ass'n Form. Opns. 456(1989)).

9 Objection, this request exceeds the number of specially prepared interrogatories allowed by
10 Code of Civil Procedure section 2030.030(a)(1).

11 Objection, this request fails capitalize all specially defined terms, or indicate that the
12 specially defined term is used, in violation of Code of Civil Procedure section 2030.030(e).

13 Objection, the definition of “matter” is not defined and “litigation” is defined, but not used,
14 and is therefore substantially likely to lead to confusion and the adducement of irrelevant evidence,
15 as such the Interrogatory is vague, ambiguous and unintelligible.


16 Objection, the term “relevant period” calls for the disclosure of irrelevant information
17 because it includes a request for information that does not relate to Rebecca Willis participation in
18 the *Antelope Valley Groundwater Cases*, Judicial Council Coordination Proceeding No. 4408.

19 Objection, to the extent the request calls for a response from the City of Lancaster and City
20 of Palmdale, the request calls for irrelevant information and is not likely to adduce relevant
21 information.

22
23 This response is on behalf of all above referenced counsel.

24
25 CHARLTON WEEKS LLP

26 Dated: February 12, 2011

27 
28 Bradley T. Weeks
Attorney for Quartz Hill Water District

LAW OFFICES OF
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PROOF OF SERVICE

I, Stefanie D. Hedlund, 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 Best Best & Krieger LLP, 400 Capitol Mall, Suite 1650, Sacramento, California 95814. On February, 2011, I served the within document(s):

RESPONSE TO SPECIAL INTERROGATORIES BY REBECCA WILLIS

- 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 Irvine, California addressed as set forth below.
- by causing personal delivery by ASAP Corporate Services 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 Federal Express 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 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 February 14, 2011, at Truckee, California.


Stefanie Hedlund