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October 8, 2012

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**VIA ELECTRONIC POSTING AND FACSIMILE (661) 265-1650**

Bradley Weeks  
Charlton Weeks LLP  
1031 West Avenue M-14, Suite A  
Palmdale, CA 93551-1457

Re: Antelope Valley Groundwater Cases  
Judicial Council Proceeding No. 4408  
Santa Clara County Superior Court Case No. 1-05-CV 049053  
**Discovery Responses**

Dear Mr. Weeks:

As you know we are counsel for Tejon Ranch Company, Tejon Ranchcorp (collectively Tejon), and Granite Construction Company (Granite) in the above-referenced proceeding. This letter is also being sent on behalf of Bob Joyce, who you will recall represents the Diamond Farming entities. The purpose of this letter is to fulfill our obligations under the Civil Discovery Act to make a reasonable and good faith effort to resolve our dispute regarding the discovery served on our clients by Quartz Hill Water District (Quartz Hill). Quartz Hill served the following discovery on Tejon and the Diamond Farming entities:

1. Form Interrogatories, Set One
2. Special Interrogatories, Set One
3. Request for Admissions, Set One
4. Demand for Production of Documents, Set One
5. Request for Admissions, Set Two
6. Form Interrogatories, Set Two

Quartz Hill also served Granite with the following discovery:

1. Special Interrogatories, Set One
2. Request for Production of Documents, Set One
3. Form Interrogatories, Set One
4. Request for Admissions, Set One

KUHS & PARKER

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During our September 25, 2012 telephone conference, and by follow-up email, we had requested an extension of time within which to respond to Quartz Hill's discovery. As I mentioned during that telephone call, I have been preparing for a 10-14 day jury trial which is set to commence on October 10, 2012. Mr. Joyce has also requested an extension of time to accommodate his trial schedule. As further discussed, the discovery seems premature, overbroad and perhaps irrelevant until the Court decides what issues will be tried in the next phase of trial. We therefore ask that you reconsider our request for an additional 30 days to respond to Quartz Hill's discovery.

Thank you for your anticipated cooperation.

Very truly yours,



Robert G. Kuhs

RGK/lel