

1 Robert G. Kuhs, SBN 160291  
2 Bernard C. Barmann, Jr., SBN 149890  
3 Kuhs & Parker  
4 P. O. Box 2205  
5 1200 Truxtun Avenue, Suite 200  
6 Bakersfield, CA 93303  
7 Telephone: (661) 322-4004  
8 Facsimile: (661) 322-2906  
9 E-Mail: rgkuhs@kuhsparkerlaw.com

10 Attorneys for Granite Construction Company

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
12 **COUNTY OF LOS ANGELES - CENTRAL DISTRICT**

13 ANTELOPE VALLEY GROUNDWATER  
14 CASES

15 Included Actions:

16 Los Angeles County Waterworks District No. 40  
17 v. Diamond Farming Co., Superior Court of  
18 California, County of Los Angeles, Case No. BC  
19 325201;

20 Los Angeles County Waterworks District No. 40  
21 v. Diamond Farming Co., Superior Court of  
22 California, County of Kern, Case No. S-1500-CV-  
23 254-348;

24 Wm. Bolthouse Farms, Inc. v. City of Lancaster,  
25 Diamond Farming Co. v. Lancaster, Diamond  
26 Farming Co. v. Palmdale Water Dist., Superior  
27 Court of California, County of Riverside, Case  
28 No. RIC 353 840, RIC 344 436, RIC 344 668

Judicial Council Coordination No. 4408

Santa Clara Case No. 1-05-CV-049053  
Assigned to Hon. Jack Komar

**OBJECTIONS TO LITTLE ROCK  
SAND AND GRAVEL, INC., ET  
AL.'S NOTICE AND  
SUPPLEMENTAL NOTICE TO  
GRANITE CONSTRUCTION  
COMPANY TO APPEAR AND  
PRODUCE DOCUMENTS AT TRIAL**

[Code Civ. Proc., § 2025.410.]

Phase 4 Trial Date: May 28, 2013

**I. INTRODUCTION**

GRANITE CONSTRUCTION COMPANY (the "objecting party") hereby objects to  
LITTLE ROCK SAND AND GRAVEL, INC., ET AL.'S (the "noticing party") Notice and  
Supplemental Notice to Granite Construction Company to Appear and Produce Documents at  
Trial (the "Notice") as follows:

## II. DEFINITIONS

The following words and phrases, in addition to the words and phrases defined in Part I hereof, shall govern the construction of this document unless the context otherwise requires:

1. “Ground 1” means that the matter sought is neither admissible in evidence nor reasonably calculated to lead to the discovery of admissible evidence. (Code Civ. Proc., § 2017.010.)

2. “Ground 2” means that the Notice is not timely.

3. “Ground 3” means that the matter sought is equally available to the noticing party.

4. “Ground 4” means that the matter sought comes within the lawyer-client privilege. (Code Civ. Proc., § 2025.460.)

5. “Ground 5” means that the matter sought is protected work-product under Code of Civil Procedure section 2018.030.

6. “Ground 6” means that the matter sought is protected by the right of privacy.

7. “Ground 7” means that the request is oppressive, harassing and burdensome.

8. “Ground 8” means that the request is not full and complete in and of itself.

9. “Ground 9” means that the Notice contains subparts, or a compound, conjunctive or disjunctive request.

10. “Ground 10” means that the request is vague, ambiguous and unintelligible and fails to describe the exact documents requested in violation of Code of Civil Procedure section 1987(c).

11. “Ground 11” means that the request is overbroad.

12. “Ground 12” means that the request seeks matter protected from premature disclosure by Article 2 (commencing with section 2034.210) of Chapter 18 of the Civil Discovery Act.



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- 2. Objection on Grounds 1, 7, 8, 10 and 14.
- 3. Objection on Grounds 1, 7, 8, 10 and 14.
- 4. Objection on Grounds 1, 7, 8, 10 and 14.
- 5. Objection on Grounds 1, 7, 8, 10 and 14.
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- 8. Objection on Grounds 1, 7, 8, 10 and 14.
- 9. Objection on Grounds 1, 7, 8, 10 and 14.
- 10. Objection on Grounds 1, 7, 8, 10 and 14.
- 11. Objection on Grounds 1, 7, 8, 10 and 14.
- 12. Objection on Grounds 1, 7, 8, 10 and 14.
- 13. Objection on Grounds 1, 3, 7, 8, 10 and 14.
- 14. Objection on Grounds 1, 7, 8, 10 and 14.
- 15. Objection on Grounds 1, 7, 8, 10 and 14.
- 16. Objection on Grounds 1, 3, 7, 8, 10 and 14.

The objecting party additionally objects to the noticing party's Notice to Appear and Produce Documents at Trial as follows:

- 1. Objection on Grounds 1, 7, 8, 10 and 14.
- 2. Objection on Grounds 1, 7, 8, 10 and 14.
- 3. Objection on Grounds 1, 7, 8, 10 and 14.
- 4. Objection on Grounds 1, 7, 8, 10 and 14.

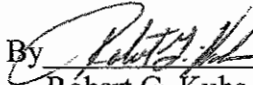
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5. Objection on Grounds 1, 7, 8, 10 and 14.

Dated: May 15, 2013

KUHS & PARKER

By  \_\_\_\_\_  
Robert G. Kuhs,  
Attorneys for Granite Construction Company

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