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7 Attorneys for Granite Construction Company

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

10 **ANTELOPE VALLEY GROUNDWATER**
11 **CASES**

12 **INCLUDED ACTIONS:**

13 Los Angeles County Waterworks District No. 40
v. Diamond Farming Co., Superior Court of
California, County of Los Angeles, Case No. BC
14 325201;

15 Los Angeles County Waterworks District No. 40
v. Diamond Farming Co., Superior Court of
California, County of Kern, Case No. S-1500-CV-
16 254348;

17 Wm. Bolthouse Farms, Inc. v. City of Lancaster,
18 Diamond Farming Co. v. Lancaster, Diamond
Farming Co. v. Palmdale Water Dist., Superior
19 Court of California, County of Riverside, Case
No. RIC 353840, RIC 344436, RIC 344668

20 Rebecca Lee Willis v. Los Angeles County
21 Waterworks District No. 40
Superior Court of California, County of Los
22 Angeles, Case No. BC 364553

23 Wood v. A.V. Materials, Inc., et al., Superior
24 Court of California, County of Los Angeles, Case
No. BC 509546

25 Little Rock Sand and Gravel, Inc. v. Granite
26 Construction Co., Superior Court of California,
County of Los Angeles, North Judicial District,
27 Case No. MC026932
28

Judicial Council Coordination No. 4408

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

**REQUEST FOR ADMISSIONS TO
LITTLE ROCK SAND AND GRAVEL,
INC., SET TWO**

[Code Civ. Proc., § 2033.210]

1 DEMANDING PARTY: GRANITE CONSTRUCTION COMPANY
2 RESPONDING PARTY: LITTLE ROCK SAND AND GRAVEL, INC.
3 SET NUMBER: TWO

4 **I. INTRODUCTION**

5 GRANITE CONSTRUCTION COMPANY requests that LITTLE ROCK SAND AND
6 GRAVEL, INC. respond to the request for admissions set forth in Part III, under oath, within
7 thirty days of the service hereof, pursuant to Article 2 (commencing with section 2033.210) of
8 Chapter 16 of Title 4 of the Code of Civil Procedure.

9 **II. DEFINITIONS**

10 The following words and phrases shall govern the construction of this document unless
11 the context otherwise requires:

- 12 1. "GRANITE" means GRANITE CONSTRUCTION COMPANY.
13 2. "YOU," "YOUR" or "LITTLE ROCK" mean LITTLE ROCK SAND AND
14 GRAVEL, INC.
15 3. "AVG CASES" means the coordinated Antelope Valley Groundwater Cases.
16 4. "LITTLE ROCK PROPERTY" means the property leased by LITTLE ROCK to
17 GRANITE pursuant to the contract entitled "Lease" that was entered into on or about April 8,
18 1987.

19 **III. REQUEST FOR ADMISSIONS**

20 **REQUEST FOR ADMISSION NO. 23:**

21 YOU do not own APN 3050-010-016.

22 **REQUEST FOR ADMISSION NO. 24:**

23 YOU do not own APN 3050-028-015.

24 **REQUEST FOR ADMISSION NO. 25:**

25 YOU did not own APN 3050-010-016 on December 28, 2015.

26 **REQUEST FOR ADMISSION NO. 26:**

27 YOU did not own APN 3050-028-015 on December 28, 2015.

1 **REQUEST FOR ADMISSION NO. 27:**

2 YOU did not own APN 3050-010-016 at any time.

3 **REQUEST FOR ADMISSION NO. 28:**

4 YOU did not own APN 3050-028-015 at any time.

5 **REQUEST FOR ADMISSION NO. 29:**

6 YOU do not own Parcel 1 ("Parcel 1") as described in paragraph 1 of YOUR complaint
7 as:

8 "PARCEL 1: The northwest quarter of the northwest quarter of Section
9 11, Township 5 North, Range 11 West, S.B.B.M., in the County of Los
10 Angeles, State of California.
11 EXCEPT THEREFROM the east 30 feet."

12 **REQUEST FOR ADMISSION NO. 30:**

13 YOU do not own Parcel 2 ("Parcel 2") as described in paragraph 1 of YOUR complaint
14 as:

15 "PARCEL 2: The southwest quarter of the northwest quarter of Section
16 11, Township 5 North, Range 11 West, S.B.B.M., in the County of Los
17 Angeles, State of California.
18 EXCEPT THEREFROM the east 30 feet of, the north 100 feet thereof."

19 **REQUEST FOR ADMISSION NO. 31:**

20 YOU do not own Parcel 3 ("Parcel 3") as described in paragraph 1 of YOUR complaint
21 as:

22 "PARCEL 3: The west half of the southwest quarter of Section 11,
23 Township 5 North, Range 11 West, S.B.B.M., in the County of Los
24 Angeles, State of California."

25 **REQUEST FOR ADMISSION NO. 32:**

26 YOU do not own Parcel 4 ("Parcel 4") as described in paragraph 1 of YOUR complaint
27 as:

28 "PARCEL 4: The north half of the northwest quarter of Section 14,
Township 5 North, Range 11 West, S.B.B.M., in the County of Los
Angeles, State of California.
EXCEPT THEREFROM that portion lying southwesterly of Highway
138."

1 **REQUEST FOR ADMISSION NO. 33:**

2 YOU did not own Parcel 1 as described in paragraph 1 of YOUR complaint on December
3 28, 2015.

4 **REQUEST FOR ADMISSION NO. 34:**

5 YOU did not own Parcel 2 as described in paragraph 1 of YOUR complaint on December
6 28, 2015.

7 **REQUEST FOR ADMISSION NO. 35:**

8 YOU did not own Parcel 3 as described in paragraph 1 of YOUR complaint on December
9 28, 2015.

10 **REQUEST FOR ADMISSION NO. 36:**

11 YOU did not own Parcel 4 as described in paragraph 1 of YOUR complaint on December
12 28, 2015.

13 **REQUEST FOR ADMISSION NO. 37:**

14 YOU did not own Parcel 1 as described in paragraph 1 of YOUR complaint at any time.

15 **REQUEST FOR ADMISSION NO. 38:**

16 YOU did not own Parcel 2 as described in paragraph 1 of YOUR complaint at any time.

17 **REQUEST FOR ADMISSION NO. 39:**


18 YOU did not own Parcel 3 as described in paragraph 1 of YOUR complaint at any time.

19 **REQUEST FOR ADMISSION NO. 40:**

20 YOU did not own Parcel 3 as described in paragraph 1 of YOUR complaint at any time.

21 Dated: November 22, 2017

KUHS & PARKER

22
23
24 By 
25 Robert G. Kuhs, Attorneys for
26 Requesting Party, Granite Construction Company

**PROOF OF SERVICE
STATE OF CALIFORNIA, COUNTY OF KERN**

I, Valerie Hanners, declare:

I am employed in the County of Kern, State of California. I am over the age of 18 and am not a party to the within action; my business address is Kuhs & Parker, 1200 Truxtun Avenue, Suite 200, Bakersfield, California 93301.

On November 22, 2017, I caused the foregoing document(s) described as **REQUEST FOR ADMISSIONS TO LITTLE ROCK SAND AND GRAVEL, INC., SET TWO** to be served on the parties in this action, as follows:

Theodore A. Chester, Jr. (U.S. Mail)
Stephen R. Isbell
Musick, Peeler & Garrett, LLP
One Wilshire Boulevard, Suite 2000
Los Angeles, CA 90017-3383

All Parties in the Antelope Valley Groundwater Cases
(**Electronic service via Glotrans**)

(BY ELECTRONIC SERVICE) by serving the document(s) listed above via Antelope Valley Watermaster Electronic Document Service – (www.avwatermaster.org) c/o Glotrans, to all parties appearing on the electronic service list for the Antelope Valley Groundwater case. Electronic service is complete at the time of transmission. My electronic notification email address is vhanners@kuhsparkerlaw.com

(BY U.S. MAIL) on November 22, 2017, at Bakersfield, California, pursuant to C.C.P. section 1013(a), I: _____ deposited the sealed envelope with the United States Postal Service, with the postage fully prepaid.

placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is place for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

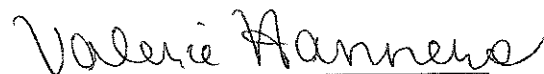
_____ (BY EMAIL TRANSMISSION) on November 22, 2017, at approximately _____ p.m. to:

_____ (BY FACSIMILE TRANSMISSION) on November 22, 2017 at approximately _____ p.m., pursuant to Rule 2008 of the California Rules of Court. The telephone number of the sending facsimile machine was 661/322-2906. A transmission report (copy attached hereto) was properly issued by the sending facsimile machine, and the transmission was reported as completed and without error.

_____ (BY PERSONAL SERVICE) on November 22, 2017 pursuant to C.C.P. section 1011, I caused such envelope to be delivered by hand personally to the addressee(s):

_____ (BY OVERNIGHT COURIER) on November 22, 2017 pursuant to C.C.P. section 1013I(d), I caused such envelope with delivery fees fully prepared to be sent by Federal Express to **Theodore A. Chester, Jr. at Musick, Peeler & Garrett, LLP.**

_____ (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct, and that the foregoing was executed on November 22, 2017, in Bakersfield, California.



Valerie Hanners