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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 254348;

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 353840, RIC 344436, RIC 344668

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

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

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

Judicial Council Coordination No. 4408

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

DEMAND FOR PRODUCTION OF
DOCUMENTS TO LITTLE ROCK
SAND AND GRAVEL, INC., SET TWO

[Code Civ. Proc., § 2031.010]

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 (the "DEMANDING PARTY") requests that
6 LITTLE ROCK SAND AND GRAVEL, INC. (the "RESPONDING PARTY"), produce and
7 permit the DEMANDING PARTY or the DEMANDING PARTY's representative to inspect and
8 copy the DOCUMENTS described in Part III hereof. The date, time and place of the inspection
9 and copying shall be as follows unless otherwise agreed between counsel for the DEMANDING
10 PARTY and counsel for the RESPONDING PARTY:

11 Date: December 27, 2017

12 Time: 10:00 a.m.

13 Place: 1200 Truxtun Avenue, Suite 200

14 Bakersfield, CA 93301

15 II. DEFINITIONS

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

- 18 1. "GRANITE" means Granite Construction Company.
- 19 2. "YOU" or "YOUR" means Little Rock Sand and Gravel, Inc.
- 20 3. "DOCUMENT" means a writing, as defined by Evidence Code section 250, and
21 includes the originals or a copy of handwriting, typewriting, printing, photostats, photographs,
22 electronically stored information, and every other means of recording upon any tangible thing
23 and form of communicating or representation, including letters, words, pictures, sounds, or
24 symbols, or combination of them.
- 25 4. "RELATE TO" and "RELATES TO" mean disclose, discuss, support, evidence,
26 constitute, identify, indicate, involve, reference or reflect the subject matter referred to.
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5. "COMPLAINT" means the Verified First Amended Complaint filed by YOU on or about April 11, 2017, in Los Angeles County Superior Court, Case No. MC026932, entitled *Little Rock Sand and Gravel, Inc. v. Granite Construction Company*.

6. "ANSWER" means the Verified Answer to First Amended Complaint filed by GRANITE on or about May 17, 2017, in Los Angeles County Superior Court, Case No. MC026932, entitled *Little Rock Sand and Gravel, Inc. v. Granite Construction Company*.

7. "LEASE" means the Lease dated April 8, 1987, between GRANITE and LITTLE ROCK, as amended.

8. "LEASE PROPERTY" means the property that is leased by GRANITE from LITTLE ROCK for operation of a rock, sand and gravel quarry.

III. REQUEST FOR PRODUCTION

YOU are required to produce, at the date, time and location so noticed, all DOCUMENTS described below. This demand relates not only to all DOCUMENTS under YOUR possession, custody or control, but also those DOCUMENTS reasonably available to YOU. To the extent any DOCUMENT consists of electronically stored information as defined in Code of Civil Procedure section 2016.020, such DOCUMENT must be produced in its native format.

REQUEST FOR PRODUCTION NO. 24:

All annual statements of groundwater extraction and use submitted by YOU pursuant to Water Code section 5000, et seq. within the last 10 years.

REQUEST FOR PRODUCTION NO. 25:

All leases between YOU and Monte Vista Building Sites, Inc.

REQUEST FOR PRODUCTION NO. 26:

All leases between YOU and the Frank and Yvonne Lane 1993 Family Trust.

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REQUEST FOR PRODUCTION NO. 27:


All deeds relating to the properties described in paragraph 1 of YOUR complaint.

REQUEST FOR PRODUCTION NO. 28:

All DOCUMENTS evidencing the lease of all or any part of the property described in YOUR complaint to any person or entity other than GRANITE.

Dated: November 22, 2017

KUHS & PARKER

By  _____
Robert G. Kuhs, Attorneys for
Demanding 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 **DEMAND FOR PRODUCTION OF DOCUMENTS 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.

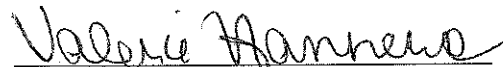
_____ (BY EMAIL TRANSMISSION) on November 22, 2017, at approximately _____ p.m. to:

_____ (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