

1 ERIC N. ROBINSON, State Bar No. 191781
erobinson@kmtg.com
2 STANLEY C. POWELL, State Bar No. 254057
spowell@kmtg.com
3 JENIFER N. RYAN, State Bar No. 311492
jryan@kmtg.com
4 KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD
A Professional Corporation
5 1331 Garden Highway, 2nd Floor
Sacramento, California 95833
6 Telephone: (916) 321-4500
Facsimile: (916) 321-4555
7
8 MICHAEL N. FEUER, State Bar No. 111529
Los Angeles City Attorney
9 JOSEPH BRAJEVICH, General Counsel, Water and Power
BRIAN C. OSTLER, General Counsel, Los Angeles World Airports
10 Attorneys for Defendant CITY OF LOS ANGELES and
LOS ANGELES WORLD AIRPORTS
11 Attorneys for Cross-Defendants City of Los
Angeles and Los Angeles World Airports
12

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

14 **COUNTY OF LOS ANGELES**

15
16 Coordination Proceeding
17 ANTELOPE VALLEY GROUNDWATER
CASES,
18

Los Angeles County Waterworks District No.
19 40 v. Diamond Farming Co.
20 Los Angeles County Waterworks District No.
40 v. Diamond Farming Co.
21 Wm Bolthouse Farms, Inc. v. City of
22 Lancaster
23 Diamond Farming Co. v. City of Lancaster
24 Diamond Farming Co. v. Palmdale Water
District,
25

26 AND RELATED ACTIONS

Judicial Council Coordination
Proceeding No. 4408

**NOTICE OF DEPOSITION OF
PAMELLA ZAMRZLA AND REQUEST
FOR PRODUCTION OF DOCUMENTS**

Date: June 3, 2022
Time: 1:30 p.m.
Place: Kronick, Moskovitz, Tiedemann &
Girard, 1331 Garden Hwy, 2nd
Floor, Sacramento, CA 95833

The Hon. Jack Komar, Dept. 17
Santa Clara Case No. 105 CV 049053

Riverside County Superior Court
Lead Case No. RIC 344436
Case No. RIC 344668
Case No. RIC 353840

Los Angeles Superior Court Case
No. BC 325201
Kern County Superior Court Case
No. S-1500-CV-254348

1 **TO ALL PARTIES AND THEIR COUNSEL OF RECORD HEREIN:**

2 PLEASE TAKE NOTICE that, pursuant to Sections 2025.010, *et seq.*, of the California Code
3 of Civil Procedure, City of Los Angeles (Los Angeles World Airports) and Grimmway Enterprises, by
4 and through their attorneys of record, will take the deposition, on oral examination, of Pamella
5 Zamrzla, commencing at 1:30 p.m. on June 3, 2022, at Kronick, Moskovitz, Tiedemann & Girard,
6 1331 Garden Hwy, 2nd Floor, Sacramento, CA 95833, and continuing from day to day, Saturdays,
7 Sundays and legal holidays excluded, until completed, or until any time limitation imposed by statute
8 or agreed upon by the parties is reached.

9 PLEASE TAKE FURTHER NOTICE that the deposing party intends to cause the proceedings
10 to be recorded both stenographically, including by the instant display of testimony, before a certified
11 court reporter, and by videotape. The deposing party specifically reserves the right to use the
12 videotape at the time of trial.

13 If an interpreter is required, the undersigned must be notified in writing at least five (5) days
14 prior to the deposition date of the language spoken by the deponent.

15 **NOTICE IS FURTHER GIVEN** that, pursuant to California Code of Civil Procedure
16 Sections 2025.220(a)(4) and 2025.280(a), Pamella Zamrzla is required to produce the documents,
17 records and other materials described below, which are in her possession, or under the custody or
18 control of her or any of her agents, representatives, and/or attorneys, on or before the date and time set
19 forth for her deposition. The documents to be produced by Pamella Zamrzla are as follows:

20 **DEFINITIONS**

21 A. "PERSON(S)" includes any natural person, firm, association, organization, partnership,
22 business, trust, corporation, governmental or public entity or any other form of legal entity.

23 B. "DOCUMENT" or "DOCUMENTS" shall mean all documents, electronically stored
24 information, and tangible things, including without limitation all writings (as defined in Section 250 of
25 the California Evidence Code) and all other means of recording information, whether written,
26 transcribed, taped, filmed, microfilmed, or in any other way produced, reproduced, or recorded, and
27 including but not limited to: originals, drafts, computer-sorted and computer-retrievable information,
28 copies and duplicates that are marked with any notation or annotation or otherwise differ in any way

1 from the original, correspondence, memoranda, reports, notes, minutes, contracts, agreements, books,
2 records, checks, vouchers, invoices, purchase orders, ledgers, diaries, logs, calendars, computer
3 printouts, computer disks, card files, lists of persons attending meetings or conferences, sketches,
4 diagrams, calculations, evaluations, analyses, directions, work papers, press clippings, sworn or
5 unsworn statements, requisitions, manuals or guidelines, audit work papers, financial analyses, tables
6 of organizations, charts, graphs, indices, advertisements and promotional materials, audited and
7 unaudited financial statements, trade letters, trade publications, newspapers and newsletters,
8 photographs, emails, electronic or mechanical records, facsimiles, telegrams and telecopies, and
9 audiotapes. Each draft, annotated, or otherwise non-identical copy is a separate DOCUMENT within
10 the meaning of this term. DOCUMENTS shall also include any removable sticky notes, flags, or
11 other attachments affixed to any of the foregoing, as well as the files, folder tabs, and labels appended
12 to or containing any documents. DOCUMENTS expressly include all ELECTRONIC RECORDS.

13 C. "ELECTRONIC RECORDS" shall mean the original (or identical duplicate when the
14 original is not available) and any non-identical copies (whether non-identical because of notes made
15 on copies or attached comments, annotations, marks, transmission notations, or highlighting of any
16 kind) of writings of every kind and description inscribed by mechanical, facsimile, electronic,
17 magnetic, digital, or other means. ELECTRONIC RECORDS includes, by way of example and not
18 by limitation, computer programs (whether private, commercial, or work-in-progress), programming
19 notes and instructions, activity listings of email transmittals and receipts, output resulting from the use
20 of any software program (including word processing documents, spreadsheets, database files, charts,
21 graphs and outlines), electronic mail, and any and all miscellaneous files and file fragments, regardless
22 of the media on which they reside and regardless of whether said ELECTRONIC RECORDS exists in
23 an active file, deleted file, or file fragment. ELECTRONIC RECORDS includes without limitation
24 any and all items stored on computer memories, hard disks, diskettes and cartridges, network drives,
25 network memory storage, archived tapes and cartridges, backup tapes, floppy disks, CD-ROMs,
26 removable media, magnetic tapes of all types, microfiche, and any other media used for digital data
27 storage or transmittal. ELECTRONIC RECORDS also includes the file, folder tabs, and containers
28 and labels appended to or associated with each original and non-identical copy.

1 D. "COMMUNICATION(S)" means any oral, written or electronic transmission of
2 information, including but not limited to meetings, discussions, conversations, telephone calls,
3 telegrams, memoranda, letters, telecopies, telexes, conferences, messages, notes or seminars.

4 E. "RELATING TO," "RELATED TO" or "RELATE(S) TO" means constituting,
5 containing, concerning, embodying, reflecting, identifying, stating, mentioning, discussing,
6 describing, evidencing, or in any other way being relevant to that given subject matter.

7 F. "PAMELLA ZAMRZLA," "YOU" and "YOUR" shall mean Pamella Zamrzla and all
8 of her employees and agents, including attorneys, or other PERSONS acting on her behalf.

9 G. "PROPERTY" means the real property designated APN Nos 3220-006-002, 3220-006-
10 003, 3220-006-026, 3220-001-027, 3220-001-028

11 **DOCUMENTS TO BE PRODUCED**

- 12 1. All deeds RELATING TO the PROPERTY.
- 13 2. All title reports RELATING TO the PROPERTY.
- 14 3. All real property tax bills RELATING TO the PROPERTY since January 1, 2000.
- 15 4. All photographs and video taken on or after January 1, 2000, depicting the PROPERTY
16 or any portion thereof.
- 17 5. All photographs and video depicting any water well or any portion thereof on the
18 PROPERTY.
- 19 6. All photographs and video taken on or after January 1, 2000, depicting any electrical
20 panel on the PROPERTY.
- 21 7. All DOCUMENTS RELATING TO each and every water well on the PROPERTY
22 including, without limitation, drilling permits, drilling logs, installation, maintenance and repair
23 records.
- 24 8. All DOCUMENTS, including maps, plats and the like depicting the location of any
25 water systems on the PROPERTY, including all mains, laterals, valves and sprinkler lines.
- 26 9. All DOCUMENTS evidencing the amount of groundwater pumped from each well
27 located on the PROPERTY since January 1, 2000.

1 10. All Notices of Groundwater Extraction and Diversion (“NOTICES”) filed with the
2 State Water Resources Control Board (“SWRCB”) or any regional office for the PROPERTY.

3 11. All COMMUNICATIONS with the SWRCB RELATING TO groundwater extraction
4 for the PROPERTY.

5 12. ALL DOCUMENTS RELATING TO the amount of electrical power used on the
6 PROPERTY or any part thereof, since January 1, 2000, including all invoices and billing records,
7 pump tests, and the like.

8 13. All DOCUMENTS evidencing communications with Southern California Edison
9 RELATING TO the PROPERTY or any part thereof.

10 14. All DOCUMENTS evidencing any pump test performed on the wells on the
11 PROPERTY or any part thereof.

12 15. All DOCUMENTS evidencing the lease of the PROPERTY or any part thereof.

13 16. All DOCUMENTS evidencing the lease of any land adjacent to the PROPERTY or any
14 part thereof since January 1, 2000.

15 17. All DOCUMENTS evidencing COMMUNICATIONS with Gene Nebeker, since
16 January 1, 2000.

17 18. All DOCUMENTS evidencing COMMUNICATIONS with Jan Hendrix, since January
18 1, 2000.

19 19. All DOCUMENTS evidencing the purchase of water from any source since January 1,
20 2000.

21 20. All DOCUMENTS evidencing any claimed overlying right to pump groundwater.

22 21. YOUR current CV or resume.

23 DATED: May 12, 2022

KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD
A Professional Corporation


24
25 By: 

26 Eric N. Robinson
27 Jenifer N. Ryan
28 Attorneys for Defendant CITY OF LOS ANGELES
and LOS ANGELES WORLD AIRPORTS

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DATED: May 12, 2022

LEBEAU THELEN LLP

By:  For _____
Robert G. Kuhs
Attorneys for GRIMMWAY ENTERPRISES

1 **Judicial Council Coordination Proceeding No. 4408**
2 **For Filing Purposes Only: Santa Clara County Case No.: 1-05-CV-049053**

3 **PROOF OF SERVICE**

4 **STATE OF CALIFORNIA, COUNTY OF SACRAMENTO**

5 At the time of service, I was over 18 years of age and not a party to this action. I am
6 employed in the County of Sacramento, State of California. My business address is 1331 Garden
7 Hwy, 2nd Floor, Sacramento, CA 95833.

8 On May 12, 2022, I served true copies of the following document(s) described as
9 **NOTICE OF DEPOSITION OF PAMELLA ZAMRZLA AND REQUEST FOR**
10 **PRODUCTION OF DOCUMENTS** on the interested parties in this action as follows:

11 **BY ELECTRONIC TRANSMISSION:** By submitting an electronic version of the
12 document(s) to the parties, through the user interface at avwatermaster.org.

13 I declare under penalty of perjury under the laws of the State of California that the
14 foregoing is true and correct.

15 Executed on May 12, 2022, at Sacramento, California.

16
17
18
19
20
21
22
23
24
25
26
27
28


Sherry Ramirez