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LOS ANGELES WORLD AIRPORTS
11 Attorneys for 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,
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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
27
28

Judicial Council Coordination
Proceeding No. 4408

**AMENDED NOTICE OF DEPOSITION
OF JEANETTE ZAMRZLA AND
REQUEST FOR PRODUCTION OF
DOCUMENTS**

Date: August 18, 2022
Time: 1:30 p.m.
Place: LeBeau Thelen, 5001 E.
Commercenter Drive, Suite 300,
Bakersfield, CA 93309

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), Grimmway Enterprises,
4 Palmdale Water District, County Sanitation Districts of Los Angeles County Nos. 14 and 20
5 (collectively, “Settling Parties”), by and through their attorneys of record, will take the deposition, on
6 oral examination, of Jeanette Zamrzla, commencing at 1:30 p.m. on August 18, 2022, at LeBeau
7 Thelen, 5001 E. Commercenter Drive, Suite 300, Bakersfield, CA 93309, and continuing from day to
8 day, Saturdays, Sundays and legal holidays excluded, until completed, or until any time limitation
9 imposed by statute or agreed upon by the parties is reached.

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

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

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

23 **DEFINITIONS**

24 A. “PERSON(S)” includes any natural person, firm, association, organization, partnership,
25 business, trust, corporation, governmental or public entity or any other form of legal entity.

26 B. “DOCUMENT” or “DOCUMENTS” shall mean all documents, electronically stored
27 information, and tangible things, including without limitation all writings (as defined in Section 250 of
28 the California Evidence Code) and all other means of recording information, whether written,

1 transcribed, taped, filmed, microfilmed, or in any other way produced, reproduced, or recorded, and
2 including but not limited to: originals, drafts, computer-sorted and computer-retrievable information,
3 copies and duplicates that are marked with any notation or annotation or otherwise differ in any way
4 from the original, correspondence, memoranda, reports, notes, minutes, contracts, agreements, books,
5 records, checks, vouchers, invoices, purchase orders, ledgers, diaries, logs, calendars, computer
6 printouts, computer disks, card files, lists of persons attending meetings or conferences, sketches,
7 diagrams, calculations, evaluations, analyses, directions, work papers, press clippings, sworn or
8 unsworn statements, requisitions, manuals or guidelines, audit work papers, financial analyses, tables
9 of organizations, charts, graphs, indices, advertisements and promotional materials, audited and
10 unaudited financial statements, trade letters, trade publications, newspapers and newsletters,
11 photographs, emails, electronic or mechanical records, facsimiles, telegrams and telecopies, and
12 audiotapes. Each draft, annotated, or otherwise non-identical copy is a separate DOCUMENT within
13 the meaning of this term. DOCUMENTS shall also include any removable sticky notes, flags, or other
14 attachments affixed to any of the foregoing, as well as the files, folder tabs, and labels appended to or
15 containing any documents. DOCUMENTS expressly include all ELECTRONIC RECORDS.

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

1 removable media, magnetic tapes of all types, microfiche, and any other media used for digital data
2 storage or transmittal. ELECTRONIC RECORDS also includes the file, folder tabs, and containers
3 and labels appended to or associated with each original and non-identical copy.

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

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

10 F. "JEANETTE ZAMRZLA," "YOU" and "YOUR" shall mean Jeanette Zamrzla and all
11 of her employees and agents, including attorneys, or other PERSONS acting on her behalf.

12 G. "PROPERTY" means the real property designated APN Nos 3220-006-002, 3220-006-
13 003, 3220-006-026, 3220-001-027, 3220-001-028 and any properties owned by you or any businesses
14 you own or have a managerial interest in.

15 **DOCUMENTS TO BE PRODUCED**

16 1. All DOCUMENTS RELATING TO the Antelope Valley Groundwater Adjudication,
17 JCCP No. 4408.

18 2. All DOCUMENTS obtained from Norm Hickling.

19 3. All deeds RELATING TO the PROPERTY.

20 4. All title reports RELATING TO the PROPERTY.

21 5. All real property tax bills RELATING TO the PROPERTY since January 1, 2000.

22 6. All photographs and video taken on or after January 1, 2000, depicting the PROPERTY
23 or any portion thereof.

24 7. All photographs and video depicting any water well or any portion thereof on the
25 PROPERTY.

26 8. All photographs and video taken on or after January 1, 2000, depicting any electrical
27 panel on the PROPERTY.

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1 9. All DOCUMENTS RELATING TO each and every water well on the PROPERTY
2 including, without limitation, drilling permits, drilling logs, installation, maintenance and repair
3 records.

4 10. All DOCUMENTS, including maps, plats and the like depicting the location of any
5 water systems on the PROPERTY, including all mains, laterals, valves and sprinkler lines.

6 11. All DOCUMENTS evidencing the amount of groundwater pumped from each well
7 located on the PROPERTY since January 1, 2000.

8 12. All Notices of Groundwater Extraction and Diversion (“NOTICES”) filed with the
9 State Water Resources Control Board (“SWRCB”) or any regional office RELATING TO the
10 PROPERTY.

11 13. All COMMUNICATIONS with the SWRCB RELATING TO groundwater extraction
12 for the PROPERTY.

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

16 15. All DOCUMENTS evidencing communications with Southern California Edison
17 RELATING TO the PROPERTY or any part thereof.

18 16. All DOCUMENTS evidencing any pump test performed on the wells on the
19 PROPERTY or any part thereof.

20 17. All DOCUMENTS evidencing the lease of the PROPERTY or any part thereof.

21 18. All DOCUMENTS evidencing the lease of any land adjacent to the PROPERTY or any
22 part thereof since January 1, 2000.


23 19. All DOCUMENTS evidencing the amount of groundwater applied to each parcel of
24 PROPERTY since January 1, 2000.

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DATED: August 2, 2022

KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD
A Professional Corporation

By: 
Eric N. Robinson
Jenifer N. Ryan
Attorneys for Defendant CITY OF LOS ANGELES
and LOS ANGELES WORLD AIRPORTS


DATED: August 2, 2022

LEBEAU THELEN LLP

By:  for
Robert G. Kuhs
Attorneys for GRIMMWAY ENTERPRISES


DATED: August 2, 2022

LAGERLOF, LLP

By:  for
Thomas S. Bunn
Attorneys for PALMDALE WATER DISTRICT

DATED: August 2, 2022

ELLISON, SCHNEIDER, HARRIS & DONLAN LLP

By:  for
Christopher M. Sanders
Attorneys for COUNTY SANITATION
DISTRICTS OF LOS ANGELES COUNTY NOS.
14 AND 20

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 August 2, 2022, I served true copies of the following document(s) described as
9 **AMENDED NOTICE OF DEPOSITION OF JEANETTE ZAMRZLA AND REQUEST**
10 **FOR 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 August 2, 2022, at Sacramento, California.

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Sherry Ramirez