

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 JULIE CONBOY RILEY, Interim 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  
27  
28

Judicial Council Coordination  
Proceeding No. 4408

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

Date: August 18, 2022  
Time: 9:00 a.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 Pamela Zamrzla, commencing at 9:00 a.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 Sections  
17 2025.220(a)(4) and 2025.280(a), Pamela Zamrzla is required to produce the documents, records and  
18 other materials described below, which are in her possession, or under the custody or control of her or  
19 any of her agents, representatives, and/or attorneys, on or before the date and time set forth for her  
20 deposition. Pamela Zamrzla is required to produce any additional documents discovered or created  
21 since her last production. The documents to be produced by Pamela Zamrzla are as follows:

22 **DEFINITIONS**

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

25 B. "DOCUMENT" or "DOCUMENTS" shall mean all documents, electronically stored  
26 information, and tangible things, including without limitation all writings (as defined in Section 250 of  
27 the California Evidence Code) and all other means of recording information, whether written,  
28 transcribed, taped, filmed, microfilmed, or in any other way produced, reproduced, or recorded, and

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

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

1 storage or transmittal. ELECTRONIC RECORDS also includes the file, folder tabs, and containers  
2 and labels appended to or associated with each original and non-identical copy.

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

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

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

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

14 **DOCUMENTS TO BE PRODUCED**

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

17 2. All DOCUMENTS obtained from Norm Hickling.

18 3. All deeds RELATING TO the PROPERTY.

19 4. All title reports RELATING TO the PROPERTY.

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

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

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

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

27  
28

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.

25  
26  
27  
28

1 DATED: August 2, 2022

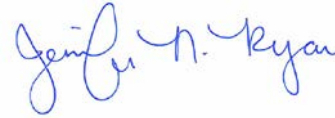
KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD  
A Professional Corporation

2

3

4

By:



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

5

6

7

8 DATED: August 2, 2022

LEBEAU THELEN LLP

9

10

By:



for

Robert G. Kuhs  
Attorneys for GRIMMWAY ENTERPRISES

11

12

13 DATED: August 2, 2022

LAGERLOF, LLP

14

15

By:



for

Thomas S. Bunn  
Attorneys for PALMDALE WATER DISTRICT

16

17

18 DATED: August 2, 2022

ELLISON, SCHNEIDER, HARRIS & DONLAN LLP

19

20

By:



for

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

21

22

23

24

25

26

27

28

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

**PROOF OF SERVICE**

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

**STATE OF CALIFORNIA, COUNTY OF SACRAMENTO**

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

On August 2, 2022, I served true copies of the following document(s) described as **AMENDED NOTICE OF DEPOSITION OF PAMELLA ZAMRZLA AND REQUEST FOR PRODUCTION OF DOCUMENTS** on the interested parties in this action as follows:

**SEE ATTACHED SERVICE LIST**

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

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

Executed on August 2, 2022, at Sacramento, California.

\_\_\_\_\_  
Sherry Ramirez