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5 (661) 265-0969

6 Attorney for Quartz Hill Water District
7 Defendant/Cross Complainant

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA

9 FOR THE COUNTY OF LOS ANGELES

10 ANTELOPE VALLEY GROUNDWATER
11 CASES

12 Included Actions:

13 Los Angeles County Waterworks District No.
14 40 v. Diamond Farming Co.
15 Superior Court of California, County of Los
16 Angeles, Case No. BC325201;

17 Los Angeles County Waterworks District
18 No. 40 v. Diamond Farming Co.
19 Superior Court of California
20 County of Kern, Case No. S-1500-CV-254-
21 348;

22 Wm. Bolthouse Farms, Inc. v. City of
23 Lancaster
24 Diamond Farming Co. v. City of Lancaster
25 Diamond Farming Co. v. Palmdale Water Dist.
26 Superior Court of California
27 County of Riverside, consolidated actions
28 Case Nos. RIC 353840, RIC 344436,
RIC 344668.

**Judicial Council Coordination Proceeding
No. 4408**

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

Date: February 14, 2012
Time: 9:00 a.m.
Location: Room 1515
Judge Jack Komar

Notice of Motion:

1. Compel Answers to Special Interrogatories
2. Compel Answers to Form Interrogatories
3. Deem the Truth of Matters Admitted and Conclusively Established
4. Compel Responses to Demand for Production Document

For Order Reserving Award Monetary Sanctions

TO ALL PARTIES LISTED ON EXHIBIT ONE TO THIS NOTICE AND THEIR ATTORNEY
OF RECORD HEREIN:

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PLEASE TAKE NOTICE that on February 14, 2012, at 9:00 a.m., or as soon thereafter as this matter may be heard at the Los Angeles Superior Court, Central Civil West, 600 South Commonwealth Avenue, 15th Floor, Room 1515, Los Angeles, California, 90005, Quartz Hill Water District will move the court for an order:

1. Compelling the parties listed on Exhibit One to this notice, to serve full and complete verified answers, without objections, to the Special Interrogatories, Set Number One, interrogatories one through twenty-two, served on the parties listed on Exhibit One to this notice November 10, 2011.
2. Compelling the parties listed on Exhibit One to this notice, to serve full and complete verified answers, without objections, to the Form Interrogatories, Set Number One, interrogatories one through twenty-two, served on the parties listed on Exhibit One to this notice November 10, 2011.
3. Compelling the parties listed on Exhibit One to this notice, to serve responses, without objections, to the Request for Production of Documents, Set Number One, demands one through thirteen, served on the parties listed on Exhibit One to this notice on November 10, 2011.
4. Deeming the truth of all matters specified in Request for Admissions, Set Number One, requests one through four, served on the parties listed on Exhibit One to this notice on November 10, 2011, admitted and conclusively established.
5. Deeming the truth of all matters specified in Request for Admissions, Set Number Two, requests five through seven, served on the parties listed on Exhibit One to this notice on November 11, 2011, admitted and conclusively established.

This motion is made pursuant to Code of Civil Procedure sections 2030.290, 2031.300, and 2033.280 on the grounds that the responding parties have failed, without justification, to respond to the discovery, and has waived the right to object to the discovery.

1 Notice is additionally given that Quartz Hill Water District has incurred attorney fees as a result of
2 bringing this motion will request that the Court award it monetary sanctions at a time, and in an
3 amount, in the future as may be just.

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5 This motion is further based upon this notice; the attached Memorandum of Points and
6 Authorities; the Declaration of Bradley T. Weeks, filed herewith; upon the records and files in this
7 action; and upon such further evidence and argument as may be presented prior to or at the time of
8 hearing on the motion.

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Dated: January 10, 2012

CHARLTON WEEKS LLP



Bradley T. Weeks
Attorney for Quartz Hill Water District

- 1 Alta Vista SunTower, LLC
- 2 Andrews, Franklin D.
- 3 Andrews, Treba
- 4 Angelo and Dolores M. Cassara as Trustees of the Cassara Marital Trust
- 5 Antelope Valley Country Club Improvement Company, Inc.
- 6 Antelope Valley Joint Union High School District
- 7 Arklin Brothers Enterprises
- 8 Arklin, Philip H.
- 9 AV Solar Ranch 1, LLC
- 10 Balice, Maria
- 11 Balice, Norman
- 12 Blayney, Randall
- 13 Bloom, Melody
- 14 Boron Community Services District
- 15 Boruchin, as Trustee for the John and Dora Boruchin Living Trust, John
- 16 Britton Associates, LLP
- 17 Bujulian Brothers, Inc.
- 18 Burrows, Bruce - 300 A 40 H, LLC
- 19 Bushnell Enterprises, LLC
- 20 Cabahug, Jaime and Arlene
- 21 Cameron Properties
- 22 Chan, Hawk Nin - Self-Representing
- 23 City National Bank, Trustee
- 24 Collicutt, Ikuku
- 25 E.C. Wheeler, LLC
- 26 Eastley, Philip
- 27 Elias Qamout
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- 1 enXco Development Corporation (Sued as Roe 452)
- 2 Estrada, David
- 3 Estrada, Rita
- 4 Florence Cernicky as Trustee of the Cernicky Trust
- 5 Frankie H. Salomon Trust
- 6 Fredrichsen, Lewis
- 7 Fry, Ron
- 8 Gaskell SunTower, LLC
- 9 Gateway Triangle Properties
- 10 Hancock, Catherine
- 11 Hancock, Timothy
- 12 Harbaugh, Barry
- 13 Harris, Steven
- 14 Herrmann, David
- 15 High Desert Investments, LLC
- 16 Huth, Clinto
- 17 Iannaccone, Elizabeth - Pro-per
- 18 Jung, Irene
- 19 Jung, Paul
- 20 Landfield, Richard
- 21 Lebata, Inc.
- 22 Leduc, Larry V.
- 23 Leduc, Sonia S.
- 24 Leslie Property
- 25 Lu, Clark C.
- 26 Lu, Danny C.
- 27 Lyon, Alice
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- 1 Mason, David S.
- 2 Mathis, Joe
- 3 Matsui, Jeanne
- 4 Max Webb Trustee of the Webb Trust of 1978
- 5 Melinda L. Gillman, Trustee of the Grubb Family Trust
- 6 Melvin Thomas Andrews and Margaret E. Andrews, Trustees of the Andrews Living Trust dated
- 7 August 2, 2004
- 8 Middle Butte Mine, Inc.
- 9 Mountain Brook Ranch, LLC
- 10 Murphy, Patty
- 11 Nibbelink Family Trust
- 12 Northrop Grumman Corporation (Sued As Doe 534)
- 13 Palmdale Hills Property LLC
- 14 Pittman, Thomas
- 15 Prewoznik, Marilyn J.
- 16 Prewoznik, Marilyn J., as Trustee of the Marilyn J. Prewoznik Trust
- 17 Rafferty, Gary
- 18 Rafferty, Nona
- 19 Raney, as Trustee for the Robert and Shirley Raney Living Trust , Robert D.
- 20 Raney, as Trustee for the Robert and Shirley Raney Living Trust , Shirley B.
- 21 Red Dawn SunTower, LLC
- 22 Rosamond Ranch
- 23 SGS Antelope Valley Development LLC
- 24 SHAKIB, KAMRAM
- 25 Shokrian, Elias
- 26 Shokrian, Shirley
- 27 Sierra SunTower, LLC
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- 1 Sorrento West Properties, Inc.
- 2 The Philip H. Arklin Family Trust Dated April 28, 1994
- 3 Three Arklin Limited Liability Company, The
- 4 Tom, Jung N.
- 5 Treacy, Patrick
- 6 Tumbleweed SunTower, LLC
- 7 Valentine, Roland

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PROOF OF SERVICE

I am employed in the aforesaid county, State of California; I am over eighteen years of age and not a party to the within action; my business address is 1031 West Avenue M-14, Suite A, Palmdale, California, 93551.

On January 10, 2012, at my place of business at Palmdale, California, a copy of the following DOCUMENT(s):

Notice of Motion:

- 1. Compel Answers to Special Interrogatories**
- 2. Compel Answers to Form Interrogatories**
- 3. Deem the Truth of Matters Admitted and Conclusively Established**
- 4. Compel Responses to Demand for Production Document**

For Order Reserving Award Monetary Sanctions

By posting the DOCUMENT listed above to the Santa Clara Superior Court website in regard to the Antelope Valley Groundwater Matter:

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

Executed on January 10, 2012

/s/Gayle Fenald