1 2 3 4 5 6 7 8		HE STATE OF CALIFORNIA
9 10	FOR THE COUNT	Y OF LOS ANGELES
10	ANTELOPE VALLEY GROUNDWATER CASES	Judicial Council Coordination Proceeding No. 4408
12	Included Actions:	
13	Los Angeles County Waterworks District No.	Santa Clara Case No. 1-05-CV-049053 Assigned to the Honorable Jack Komar Dept J
14	40 v. Diamond Farming Co. Superior Court of California, County of Los	Assigned to the Honorable Jack Komar Dept. I Date: February 14, 2012
15 16	Angeles, Case No. BC325201; Los Angeles County Waterworks District No. 40 v. Diamond Farming Co. Superior Court of California	Date:February 14, 2012Time:9:00 a.m.Location:Room 1515JudgeJack Komar
17 18	County of Kern, Case No. S-1500-CV-254-348;	Notice of Motion: 1. Compel Answers to Special
19	Wm. Bolthouse Farms, Inc. v. City of Lancaster	Interrogatories
20	Diamond Farming Co. v. City of Lancaster Diamond Farming Co. v. Palmdale Water Dist.	2. Compel Answers to Form Interrogatories
21	Superior Court of California County of Riverside, consolidated actions	3. Deem the Truth of Matters Admitted and Conclusively Established
22	Case Nos. RIC 353840, RIC 344436, RIC 344668.	4. Compel Responses to Demand for Production Document
23 24		For Order Reserving Award Monetary
25		Sanctions
26		
27	TO ALL PARTIES LISTED ON EXHIBIT ONE TO THIS NOTICE AND THEIR ATTORNEY OF RECORD HEREIN:	
28		1
	NOTICE OF MOTION TO COMPEL R	1 ESPONSE TO DISCOVERY AND DEEM
	ADM	ISSIONS

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:

- 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.
 - 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.
 - 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.
 - 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.

 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.

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

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

Dated: January 10, 2012

hearing on the motion.

CHARLTON WEEKS LLP

Bradley T. Weeks Attorney for Quartz Hill Water District

NOTICE OF MOTION TO COMPEL RESPONSE TO DISCOVERY AND DEEM **ADMISSIONS**

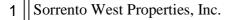
CHARLTON WEEKS LLP 331 West Avenue M-14, Suite A Palmdale, CA 93551

- 1 Alta Vista SunTower, LLC
- 2 Andrews, Franklin D.
- 3 Andrews, Treba
- 4 Angelo and Dolores M. Cassara as Trusteees 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
- 28

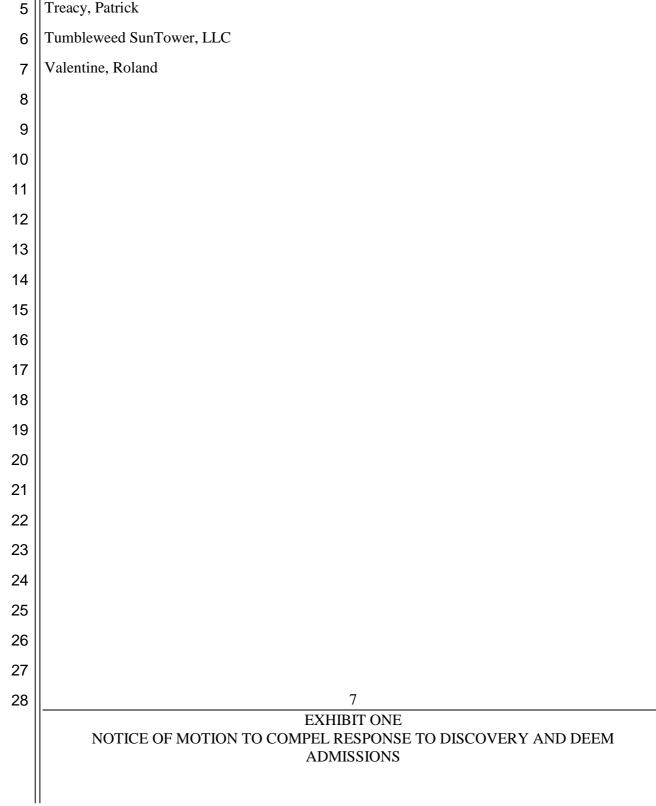
EXHIBIT ONE NOTICE OF MOTION TO COMPEL RESPONSE TO DISCOVERY AND DEEM ADMISSIONS

	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
	28	5
		EXHIBIT ONE NOTICE OF MOTION TO COMPEL RESPONSE TO DISCOVERY AND DEEM ADMISSIONS
	I	1

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
28	6
	EXHIBIT ONE NOTICE OF MOTION TO COMPEL RESPONSE TO DISCOVERY AND DEEM ADMISSIONS



- The Philip H. Arklin Family Trust Dated April 28, 1994 2
- Three Arklin Limited Liability Company, The 3
- Tom, Jung N. 4
- Treacy, Patrick



1	PROOF OF SERVICE	
2		
3	I am employed in the aforesaid county, State of California; I am over eighteen years of age	
4	and not a party to the within action; my business address is 1031 West Avenue M-14, Suite A, Palmdale, California, 93551.	
5 6	On January 10, 2012, at my place of business at Palmdale, California, a copy of the following DOCUMENT(s):	
7	Notice of Motion:	
8	1. Compel Answers to Special Interrogatories	
9	 Compel Answers to Form Interrogatories Deem the Truth of Matters Admitted and Conclusively Established 	
10	4. Compel Responses to Demand for Production Document	
11	For Order Reserving Award Monetary Sanctions	
12	By posting the DOCUMENT listed above to the Santa Clara Superior Court website in regard to	
13	the Antelope Valley Groundwater Matter:	
14	I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.	
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16	Executed on January 10, 2012	
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18	/s/Gayle Fenald	
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	PROOF OF SERVICE	