

EXHIBIT THREE
DECLARATION OF BRADLEY T. WEEKS
SPECIAL INTERROGATORIES

1 BRADLEY T. WEEKS, Bar No. 173745
2 CHARLTON WEEKS LLP
3 1031 West Avenue M-14, Suite A
4 Palmdale, CA 93551
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-CENTRAL DISTRICT

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

SPECIAL INTERROGATORIES (SET ONE)

24 PROPOUNDING PARTY: QUARTZ HILL WATER DISTRICT

25 RESPONDING PARTY: SEE EXHIBIT ONE

26 SET NO.: ONE

1 PLEASE TAKE NOTICE that requesting party requests that responding party answer the
2 following interrogatories under oath within thirty (30) days after service of these interrogatories,
3 or such additional time as may be permitted by law, under Code of Civil Procedure §2030.010 et.
4 seq.

5
6 **Interrogatory Number 1.**

7 Identify all real property YOU (YOU refers to the party responding to these requests) own in the
8 BASIN (BASIN shall be defined as on and below the ground surface within the jurisdictional area
9 defined by the court in this matter by order dated March 16, 2007) using the most recent assessor's
10 parcel number, *also known as* assessor's identification number, designated by the Los Angeles
11 County Assessor or the Kern County Assessor. A full and complete response to this interrogatory
12 shall list all such parcel numbers (e.g. Los Angeles County 123-456-7890).

13
14 **Interrogatory Number 2.**

15 For each PARCEL (PARCEL shall be defined as that real property which has given a numbered or
16 lettered designation by the Los Angeles or Kern County assessor pursuant to California Revenue
17 and Taxation Code section 327) YOU own in the BASIN state name or names of the entity,
18 person, or persons who are on record title to each PARCEL.

19
20 **Interrogatory Number 3.**

21 For each PARCEL YOU own which is located in the BASIN, state the date when YOU acquired
22 ownership of that PARCEL.

23
24 **Interrogatory Number 4.**

25 For each PARCEL YOU own which is located in the BASIN, state the number of groundwater
26 wells that have been on that PARCEL that have been active at any time since January 1, 1951.

27
28

1 **Interrogatory Number 5.**

2 For each PARCEL YOU own which is located in the BASIN, state how each PARCEL has been
3 used since January 1, 1951. An irrigated agricultural use may be described as “agricultural.”
4

5 **Interrogatory Number 6.**

6 For each PARCEL YOU own which is located in the BASIN, state how much groundwater has
7 been pumped from the groundwater wells located on that PARCEL, on an annual basis, since
8 1951.
9

10 **Interrogatory Number 7.**

11 For each PARCEL YOU own which is located in the BASIN, state how much groundwater has
12 been used on that PARCEL, on an annual basis, since 1951.
13

14 **Interrogatory Number 8.**

15 For each PARCEL YOU own which is located in the BASIN, state how much water has been
16 used, on an annual basis, on the property since 1951.
17

18 **Interrogatory Number 9.**

19 For each groundwater well that is on a PARCEL YOU own which is located in the BASIN,
20 IDENTIFY all DOCUMENTS that indicate how much groundwater has been pumped from each
21 well since January 1, 1951.

22 “DOCUMENT” shall be defined as and have the same broad meaning as it has in California
23 Evidence Code § 250 and Code of Civil Procedure §2031.010 et seq. and includes documents,
24 papers, books, accounts, letters, records, photographs, objects, and all other tangible things. It
25 includes all forms of written communication. It specifically includes all originals, copies,
26 duplicates, drafts, or other recordings of any written, graphic, or otherwise recorded matter,
27 however produced or reproduced, whether inscribed by hand or by mechanical, electronic,
28 microfilm, photographic, phonic, or any other means. It includes abstracts; address books;

1 advertisements; affidavits or statements; agreements; analyses of any kind; appointment books;
2 architectural blueprints or drawings; balance sheets; bids; billings; blueprints; books or records of
3 account; purchase orders; work papers; brochures; bulletins; calendars; charts; checks and
4 canceled checks; circulars; compilations; computer cards, runs, and printouts; computer programs;
5 computer tapes and discs; consultants' reports or studies; contracts; correspondence; data
6 processing input and output; data sheets; desk calendars; diagrams; diaries; directories; discs;
7 drawings; estimates; expense account records; experts' reports or studies; financial statements or
8 calculations; graphs; house publications; income statements; inspection records, sheets, and
9 reports; interoffice and intra-office communications; invoices; job descriptions or assignments;
10 journals; layouts; ledgers; letters; licenses; lists; magnetic tapes; manuals; maps; memorandums of
11 any kind; microfiche; microfilm; minutes or records of any kind; movies; notations; notes;
12 notebooks; opinions; organizational charts; pamphlets; permits; photographs; pictures; plans;
13 projections; promotional materials; press releases or clippings; publications; punch cards;
14 procedures; questionnaires and answers to them; quotations; records and recordings of any kind;
15 renderings; reports of any kind; rework instructions, orders, and procedures; routing slips;
16 schedules; sound recordings; specifications; statistical analyses; stenographers' notebooks; studies
17 of any kind, analyses, forecasts, and evaluations; subcontracts; summaries; surveys; tables,
18 indices, and lists; tabulations; tallies; tapes; telegrams; cables; telephone messages, telephone logs,
19 and telephone billings and statements; teletype and telex messages; trade letters; transcripts,
20 minutes, reports, and recordings of telephone or other conversations, interviews, conferences,
21 committee meetings, or other meetings; undertakings; video tapes; vouchers; and working
22 drawings, papers, and files.

23 "IDENTIFY" shall mean means to identify the document's author, signor, sender, addressee, and
24 all recipients; to state the document's title, date, and number of pages; to describe its subject
25 matter; and to state the document's present location, the name and address of any person currently
26 having custody or control of the document, and any other descriptive information necessary to
27 identify the document sufficiently in a subpoena duces tecum or a request for production; and
28

1 **Interrogatory Number 10.**

2 For each groundwater well that is on a PARCEL YOU own which is located in the BASIN, state
3 whether or not that well is metered.

4

5 **Interrogatory Number 11.**

6 For each groundwater well that is on a PARCEL YOU own which is located in the BASIN, and
7 which is metered, IDENTIFY all meter records.

8

9 **Interrogatory Number 12.**

10 For each groundwater well that is on a PARCEL YOU own which is located in the BASIN, and
11 which is not metered, provide the horse power of the well pump.

12

13 **Interrogatory Number 13.**

14 For each groundwater well that is on a PARCEL YOU own which is located in the BASIN, and
15 which is not metered, state the size of the well casing.

16

17 **Interrogatory Number 14.**

18 For each groundwater well that is on a PARCEL YOU own which is located in the BASIN, and
19 which is not metered, state the efficiency of the well for each year since 1951.

20

21 **Interrogatory Number 15.**

22 For each groundwater well that is on a PARCEL YOU own which is located in the BASIN, and
23 which is not metered, state the standing water level of the well for each year since 1951.

24

25 **Interrogatory Number 16.**

26 For each groundwater well that is on a PARCEL YOU own which is located in the BASIN, and
27 which is not metered, IDENTIFY all electrical records of electricity used to power such well.

28

1 **Interrogatory Number 17.**

2 For each groundwater well that is on a PARCEL YOU own which is located in the BASIN, and
3 which is not metered, IDENTIFY all diesel records.

4
5 **Interrogatory Number 18.**

6 For each groundwater well from which you, or the predecessor owners of YOUR PARCEL, have
7 pumped groundwater in the BASIN since 1951, state the method used to calculate the annual
8 amount of groundwater pumping.

9
10 **Interrogatory Number 19.**

11 For each groundwater well from which YOU, or the predecessor owners of YOUR PARCEL, have
12 pumped groundwater in the BASIN since 1951, if the method used to calculate the annual amount
13 of groundwater pumping was not by metering, state the amount, expressed in acres, of the
14 irrigated crops in each year.

15
16 **Interrogatory Number 20.**

17 For each groundwater well from which YOU, or the predecessor owners of YOUR PARCEL, have
18 pumped groundwater in the BASIN since 1951, if the method used to calculate the annual amount
19 of groundwater pumping was not by metering, state the crop type of the irrigated crops in each
20 year.

21
22 **Interrogatory Number 21.**

23 For each groundwater well from which YOU, or the predecessor owners of YOUR PARCEL, have
24 pumped groundwater in the BASIN since 1951, if the method used to calculate the annual amount
25 of groundwater pumping was not by metering, state the irrigation method used to irrigate the
26 crops.

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CHARLTON WEEKS LLP
1031 West Avenue M-14, Suite A
Palmdale, CA 93551

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Interrogatory Number 22.

IDENTIFY each entity, person, or persons who own land in the BASIN and who pumps groundwater from that land and is not a party to this litigation. This request does not include members of the Wood Class.

CHARLTON WEEKS LLP



Dated: November 10, 2011

Bradley T. Weeks
Attorney for Quartz Hill Water District

- 1 A. David Kagon
- 2 A.C. Warnack, as Trustee of The A.C. Warnack Trust
- 3 A.V. United Mutual Group
- 4 Abc Williams Enterprises Lp
- 5 Adams Bennett Investments, LLC
- 6 Airtrust Singapore Private Limited
- 7 Alex Wodchis
- 8 Allen Alevy
- 9 Alta Vista SunTower, LLC
- 10 Anaverde LLC
- 11 Andreas Hauke
- 12 Andrews, Franklin D.
- 13 Andrews, Treba
- 14 Angelo and Dolores M. Cassara as Trustees of the Cassara Marital Trust
- 15 Antelope Valley Country Club Improvement Company, Inc.
- 16 Antelope Valley East-Kern Water Agency
- 17 Antelope Valley Ground Water Agreement Association
- 18 Antelope Valley Joint Union High School District
- 19 Antelope Valley Water Company
- 20 Antelope Valley Water Storage LLC
- 21 Antonio U. Agustines
- 22 Arklin Brothers Enterprises
- 23 Arklin, Philip H.
- 24 Aurora P. Gabuya
- 25 Av Materials, Inc.
- 26 AV Solar Ranch 1, LLC
- 27 B. J. Calandri
- 28 Balice, Maria

- 1 Balice, Norman
- 2 Barbara L. Keys
- 3 Barry S. Munz
- 4 Betty Gluckstein
- 5 Beverly J. Tobias
- 6 Big Rock Mutual Water Company
- 7 Big West Corp.
- 8 Billy H. Kim
- 9 Blayney, Randall
- 10 Bloom, Melody
- 11 Bolthouse Properties, LLC.
- 12 Bong S. Chang
- 13 Boron Community Services District
- 14 Boruchin, as Trustee for the John and Dora Boruchin Living Trust, John
- 15 Britton Associates, LLP
- 16 Bruce Burrows
- 17 Bujulian Brothers, Inc.
- 18 Burrows, Bruce - 300 A 40 H, LLC
- 19 Bushnell Enterprises, LLC
- 20 C.C. Thelma Cole
- 21 Cabahug, Jaime and Arlene
- 22 California Portland Cement Company
- 23 California, State Of
- 24 Calmat Land Co.
- 25 Calmat Land Company
- 26 Cameron Properties
- 27 Cameron Properties
- 28 Carol K. Claypool

- 1 Castle Butte Dev Corp
- 2 Catellus Development Corporation
- 3 Catharine M. Davis
- 4 Cenon Advincula
- 5 Chan, Hawk Nin - Self-Representing
- 6 Cheng Lin Kang
- 7 Chi S. Huang
- 8 City National Bank, Trustee
- 9 Clifford N. Claypool
- 10 Collicutt, Ikuku
- 11 Consolidated Rock Products
- 12 Consolidated Rock Products Co.
- 13 Copa De Oro Land Company, a California general partnership
- 14 County Sanitation District No. 14
- 15 County Sanitation District No. 20
- 16 Crail, Charles
- 17 Crail, Jean B.
- 18 Crystal Organic Farms LLC
- 19 Daniel Saparzadeh
- 20 Daryush Iraninezhad
- 21 David L. Bowers
- 22 Del Sur Ranch, LLC
- 23 Delmar D. Van Dam
- 24 Desert Lakes Community Services District
- 25 Diamond Farming Company
- 26 Donna L. Higelmire
- 27 Donna L. Simpson
- 28 Dorothy Dreier

- 1 E.C. Wheeler, LLC
- 2 Eastley, Philip
- 3 Edgar C. Ritter
- 4 Elias Qamout
- 5 Elizabeth Wong
- 6 enXco Development Corporation (Sued as Roe 452)
- 7 Esfandiar Kadivar
- 8 eSolar, Inc.
- 9 Estrada, David
- 10 Estrada, Rita
- 11 Eugene B. Nebeker
- 12 Eugene Gabrych
- 13 Eva Lai
- 14 Fares A. Lahoud
- 15 Florence Cernicky as Trustee of the Cernicky Trust
- 16 Forrest G. Godde
- 17 Forrest G. Godde (Indiv & Trustee Of The Forrest G. Godde Trust)
- 18 Frank S. Chiodo
- 19 Frank T. Nguyen
- 20 Frankie H. Salomon Trust
- 21 Fredrichsen, Lewis
- 22 Fry, Ron
- 23 Gailen Kyle
- 24 Gailen W. Kyle (Indiv & Trustee Of The Kyle Trust)
- 25 Gareth L. Simpson
- 26 Gaskell SunTower, LLC
- 27 Gateway Triangle Properties
- 28 Genus Lp

- 1 George C. Stevens, Jr.
- 2 George C. Stevens, Jr. as Trustee of the George C. Stevens, Jr. Trust
- 3 George E. Dreier
- 4 George L. Stimson, Jr.
- 5 Georgine J. Archer
- 6 Gertrude J. Van Dam
- 7 Ggf Llc
- 8 GLDEN SANDS MOBILE HOME PARK
- 9 Grimmway Enterprises, Inc.
- 10 Guss A. Barks, Jr.
- 11 Hancock, Catherine
- 12 Hancock, Timothy
- 13 Harbaugh, Barry
- 14 Harris, Steven
- 15 Healy Enterprises, Inc.
- 16 Helen Stathatos
- 17 Helen Stathatos
- 18 Henry Ngo
- 19 Herbert Katz
- 20 Herrmann, David
- 21 High Desert Investments, LLC
- 22 Hines Family Trust
- 23 Hong Dong
- 24 Hooshpack Dev Inc.
- 25 Huth, Clinto
- 26 Hypericum Interests Llc
- 27 Iannaccone, Elizabeth - Pro-per
- 28 Ildefonso S. Bayani

- 1 Illy King
- 2 J. Cole
- 3 Jack D. Kahlo
- 4 Jacob Chetrit
- 5 Jacqueline Ackerman
- 6 James W. Kyle
- 7 James W. Kyle (Indiv & Trustee Of The Kyle Family Trust)
- 8 Jeanna Y. Chang
- 9 Joan A. Funk
- 10 John A. Calandri (Indiv & As Trustee Of The John And B.J. Calandri 2001 Trust)
- 11 John Calandri
- 12 John Hui
- 13 Joseph H. Gluckstein
- 14 Juanita R. Nichols
- 15 Julia Kyle
- 16 Jung N. Tom
- 17 Jung, Irene
- 18 Jung, Paul
- 19 Kamram S. Shakib
- 20 Kathleen M. Munz
- 21 Kazuko Yoshimatsu
- 22 Keith E. Wales
- 23 Kootenai Properties, Inc.
- 24 Kutu Investment Co.
- 25 L. Gorrindo
- 26 Land Business Corporation
- 27 Landfield, Richard
- 28 Landinv, Inc.

- 1 Lapis Land Company, LLC
- 2 Lawrence A. Godde
- 3 Lawrence A. Godde (Indiv & Trustee Of Lawrence A. Godde Trust)
- 4 Lawrence Charles Trust
- 5 Lebata, Inc.
- 6 Leduc, Larry V.
- 7 Leduc, Sonia S.
- 8 Lee S. Chiou
- 9 Leroy Daniel Bronston
- 10 Leslie Property
- 11 Lewis Fredrichsen
- 12 Light Andrew & Youngnam
- 13 Lilian S. Kaufman
- 14 Little Baldy Mutual Water Company
- 15 Littlerock Aggregate Co., Inc. dba Antelope Valley Aggregate, Inc.
- 16 Llano Mutual Water Company
- 17 Llano-Del Rio Water Company
- 18 Los Angeles County Sanitation Districts
- 19 Lu, Clark C.
- 20 Lu, Danny C.
- 21 Lyman C. Miles
- 22 Lyon, Alice
- 23 M. R. Nasir
- 24 M. S. Chung
- 25 Malloy Family Partners
- 26 Mally Family Partners Lp
- 27 Man C. Lo
- 28 Maria B. Gorrindo

- 1 Marian Gabrych
- 2 Marianne Katz
- 3 Marilyn Burgess
- 4 Marilyn Hauke
- 5 Marilyn J. Prewoznik
- 6 Mark E. Thompson Apc Sharing Plan
- 7 Mark H. Shafron
- 8 Martin Schwartz
- 9 Marwan M. Aldais
- 10 Mary Wong
- 11 Marygrace H. Santoro
- 12 Marygrace H. Santoro (Indiv & Trustee Of The Marygrace H. Santoro Rev Trust)
- 13 Mashallah Afshar
- 14 Mason, David S.
- 15 Mathis, Joe
- 16 Matsui, Jeanne
- 17 Maurice H. Stans
- 18 Max Webb Trustee of the Webb Trust of 1978
- 19 Melinda E. Cameron
- 20 Melinda L. Gillman, Trustee of the Grubb Family Trust
- 21 Melody S. Bloom
- 22 Melvin Thomas Andrews and Margaret E. Andrews, Trustees of the Andrews Living Trust dated
- 23 August 2, 2004
- 24 Michael N. Higelmire
- 25 Middle Butte Mine, Inc.
- 26 Mike M. Wu
- 27 Milton S. Davis
- 28 Minoos Iraninezhad

- 1 Mission Bell Ranch Development
- 2 Mojave Public Utility District
- 3 Moon S. Chang
- 4 Morris Gluckstein
- 5 Morteza M. Foroughi
- 6 Mountain Brook Ranch, LLC
- 7 Murphy, Patty
- 8 New Anaverde, LLC
- 9 Nibbelink Family Trust
- 10 Nilda V. Bayani
- 11 Norman L. Poulsen
- 12 North Edwards Water District
- 13 Northrop Grumman Corporation (Sued As Doe 534)
- 14 Norton P. Recht, Jr.
- 15 Oliva M. Advincula
- 16 Oliver Nichols
- 17 Oscar Rudnick
- 18 Owl Properties, Inc.
- 19 Palmdale Hills Property LLC
- 20 Patricia A. Recht
- 21 Patricia J. Riggins
- 22 Paul Lai
- 23 Paula E. Ritter
- 24 Paula E. Ritter (Indiv & Trustee Of The Ritter Family Trust)
- 25 Pei Chin Lin
- 26 Peter G. Barks
- 27 Phelan Pinon Hills Community Services District
- 28 Pittman, Thomas

- 1 Prewoznik, Marilyn J.
- 2 Prewoznik, Marilyn J., as Trustee of the Marilyn J. Prewoznik Trust
- 3 R And M Ranch
- 4 Rafferty, Gary
- 5 Rafferty, Nona
- 6 Randall Y. Blayney
- 7 Raney, as Trustee for the Robert and Shirley Raney Living Trust , Robert D.
- 8 Raney, as Trustee for the Robert and Shirley Raney Living Trust , Shirley B.
- 9 Rebecca Rudnick
- 10 Red Dawn SunTower, LLC
- 11 Reinelt Rosenloecher Corp. Psp
- 12 Richard E. Landfield
- 13 Robert A. Jones
- 14 Robert L. Shafron
- 15 Rodrigo L. Gabuya
- 16 Roland N. Grubb
- 17 Romo Lake Los Angeles Partnership
- 18 Ronald E. Bowers
- 19 Rosamond Ranch
- 20 Rose Gluckstein
- 21 Rosemount Equities Llc Series
- 22 Royal Investors Group
- 23 Royal Western Properties Llc
- 24 Ruth A. Cumming
- 25 San Yu Enterprises, Inc.
- 26 Santa Monica Mountains Conservancy
- 27 Sarkis Djanibekyan
- 28 Savas Stathatos

- 1 Savas Stathatos (Indiv & Trustee Of The Stathatos Family Trust)
- 2 Service Rock Products, L.P. (originally named as Service Rock Products Corporation)
- 3 Seven Star United Llc
- 4 SGS Antelope Valley Development LLC
- 5 SHAKIB, KAMRAM
- 6 Sheep Creek Water Company
- 7 Sheldon R. Blum, Trustee for the Sheldon R. Blum Trust
- 8 Sheldon R. Blum, Trustee, for the Sheldon R. Blum Trust; & Sheldon R. Blum, Individually
- 9 Sheng Tom
- 10 Shiung Ru Lo
- 11 Shokrian, Elias
- 12 Shokrian, Shirley
- 13 Sierra SunTower, LLC
- 14 Simin C. Neman
- 15 Soaring Vista Properties, Inc.
- 16 Sorrento West Properties, Inc.
- 17 Souad R. Nasir
- 18 Southern California Edison Company
- 19 SPC Del Sur Ranch, LLC
- 20 State Of California 50TH District And Agricultural Association
- 21 State of California; Santa Monica Mountains Conservancy; 50th District Agricultural Association
- 22 Stevens, Jr., George C.
- 23 Su, Rong
- 24 Suchu T. Huang
- 25 Tejon Ranch Company
- 26 Tejon Ranchcorp
- 27 Terry A. Munz
- 28 The Philip H. Arklin Family Trust Dated April 28, 1994

- 1 Three Arklin Limited Liability Company, The
- 2 Tierra Bonita Ranch Company
- 3 Tiong D. Tiu
- 4 Tom, Jung N.
- 5 Treacy, Patrick
- 6 Triple M Property F.K.A. 3M Property Investment Co
- 7 Trustee For The Alevy Family Trust
- 8 Trustee For The Georgine J. Archer Trust
- 9 Trustee For The Kagon Trust
- 10 Trustee For The Katz Family Trust
- 11 Trustee For The Lilian S. Kaufman Trust
- 12 Trustee For The M. Gorrindo Trust
- 13 Trustee For The Marygrace H. Santoro Rev Trust
- 14 Trustee For The Miles Family Trust
- 15 Trustee For The P C Rev Inter Vivos Trust
- 16 Trustee For The Stathatos Family Trust
- 17 Trustee For The T.J. Cole Trust
- 18 Trustee Of The Barbara L. Keys Family Trust
- 19 Trustee Of The Burroughs Irr Family Trust
- 20 Trustee Of The Cumming Family Trust
- 21 Trustee Of The Foroughi Family Trust
- 22 Trustee Of The Forrest G. Godde Trust
- 23 Trustee Of The Fredrichsen Family Trust
- 24 Trustee Of The George C. Stevens, Jr. Trust
- 25 Trustee Of The Godde Trust
- 26 Trustee Of The Grubb Family Trust
- 27 Trustee Of The Illy King Family Trust
- 28 Trustee Of The John And B.J. Calandri 2001 Trust

- 1 Trustee Of The Kadivar Family Trust
- 2 Trustee Of The Kyle Family Trust
- 3 Trustee Of The Kyle Trust
- 4 Trustee Of The Marilyn J. Prewoznik Trust
- 5 Trustee Of The Nichols Family Trust
- 6 Trustee Of The Richard E. Landfield Trust
- 7 Trustee Of The Riggins Family Trust
- 8 Trustee Of The Ritter Family Trust
- 9 Trustee Of The Simpson Family Trust
- 10 Trustee Of The Tobias Family Trust
- 11 Trustee Of The Trueblood Family Trust
- 12 Trustee Of The Wu Family Trust
- 13 Tumbleweed SunTower, LLC
- 14 U.S. Borax, Inc.
- 15 Unison Investment Co., Llc
- 16 Valentine, Roland
- 17 Van Dam, Craig
- 18 Van Dam, Delmar D.
- 19 Van Dam, Gary
- 20 Van Dam, Gertrude J.
- 21 Veronika Reinelt
- 22 Victoria Rahimi
- 23 W. F. Clumen, Jr.
- 24 WAGAS Land Company LLC
- 25 Walter E. Helmick
- 26 Wanda E. Kyle
- 27 WDS California II, LLC
- 28 White Fence Farms Mutual Water Co. Inc.

- 1 William Bolthouse Farms, Inc.
- 2 Willis, Rebecca Lee
- 3 Wilma D. Trueblood
- 4 Wm. Bolthouse Farms, Inc.
- 5 Wood, Richard A.
- 6 Ying Wah Lam
- 7 Ying X. Dong
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PROOF OF SERVICE

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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 November 10, 2011, at my place of business at Palmdale, California, a copy of the following DOCUMENT(s):

SPECIAL INTERROGATORIES

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 November 10, 2011


Gayle Benald

CHARLTON WEEKS LLP
1031 West Avenue M-14, Suite A
Palmdale, CA 93551

**THE SUPERIOR COURT OF CALIFORNIA, COUNTY OF SANTA CLARA
ELECTRONIC FILING - WWW.SCEFILING.ORG**

c/o Glotrans
2915 McClure Street
Oakland, CA94609
TEL: (510) 208-4775
FAX: (510) 465-7348
EMAIL: Info@Glotrans.com

**THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SANTA CLARA**

Coordination Proceeding Special Title (Rule 1550(b)) ANTELOPE VALLEY GROUNDWATER CASES (JCCP 4408) Included Actions: Los Angeles County Waterworks District No. 40)	Antelope Valley Groundwater Cases (JCCP 4408)
)	
)	Lead Case No.1-05-CV-049053
)	
Plaintiff,)	Hon. Jack Komar
vs.)	
)	
Diamond Farming Co. Superior Court of California County of Los Angeles, Case No. BC 325 201 Los Angeles County Waterworks District No. 40 v. Diamond Farming Co. Superior Court of California, County of Kern, Case No. S-1500-CV-254-348 Wm. Bolthouse Farms, Inc. v. City of Lancaster Diamond Farming Co. v. City of Lancaster Diamond Farming Co. v. Palmdale Water Dist. Superior Court of California, County of Riverside, consolidated actions, Case Nos. RIC 353 840, RIC 344 436, RIC 344 668)	
)	
Defendant.)	
<hr/>)	PROOF OF SERVICE
AND RELATED ACTIONS)	Electronic Proof of Service
<hr/>)	

I am employed in the County of Alameda, State of California.
I am over the age of 18 and not a party to the within action; my business address is 2915 McClure Street, Oakland, CA 94609.

The documents described on page 2 of this Electronic Proof of Service were submitted via the worldwide web on Thu. November 10, 2011 at 6:20 PM PST and served by electronic mail notification.

I have reviewed the Court's Order Concerning Electronic Filing and Service of Pleading Documents and am readily familiar with the contents of said Order. Under the terms of said Order, I certify the above-described document's electronic service in the following manner:

The document was electronically filed on the Court's website, <http://www.scefiling.org>, on Thu. November 10, 2011 at 6:20 PM PST

Upon approval of the document by the Court, an electronic mail message was transmitted to all parties on the electronic service list maintained for this case. The message identified the document and provided instructions for accessing the document on the worldwide web.

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

correct. Executed on November 10, 2011 at Oakland, California.

Dated: November 10, 2011

For WWW.SCEFILING.ORG

Andy Jamieson

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2 **Electronic Proof of Service**
3 **Page 2**

4 **Document(s) submitted by Bradley Weeks of Charlton Weeks LLP on Thu. November 10, 2011 at 6:20 PM PST**

5 1. Discovery (e-service only): Special Interrogatories by Quartz Hill Water District
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