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Exempt from filings fees under  
Government Code Section 6103

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

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 FOR THE COUNTY OF LOS ANGELES

11 ANTELOPE VALLEY GROUNDWATER  
12 CASES

**Judicial Council Coordination Proceeding  
No. 4408**

13 Included Actions:

**OBJECTION TO NOTICE TO APPEAR AT  
TRIAL AND PRODUCE DOCUMENTS**

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

18 Los Angeles County Waterworks District  
19 No. 40 v. Diamond Farming Co.  
20 Superior Court of California  
21 County of Kern, Case No. S-1500-CV-254-  
22 348;

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

1 To Tejon Ranchcorp, Granite Construction Company, and all other parties, and its  
2 attorneys of record:

3  
4 PLEASE TAKE NOTICE that Quartz Hill Water District objects to Tejon Ranchcorp's and  
5 Granite Construction Company's, Notice to Appear and Request for production of documents on  
6 the grounds as stated below.

7  
8 Mr. Reed will appear on the day scheduled for his testimony, but will not comply with the  
9 document production request contained in the Notice to Appear and Produce Documents at Trial.

10  
11 **OBJECTIONS**

12 Request 1.

13 This request is overbroad, oppressive, and burdensome, vague and ambiguous. This request calls  
14 for the production of irrelevant information and documents that exceed the scope of the phase 4  
15 trial.

16 Request 2.

17 This request is overbroad, oppressive, and burdensome, vague and ambiguous. This request calls  
18 for the production of irrelevant information and documents that exceed the scope of the phase 4  
19 trial.

20 Request 3.

21 This request is overbroad, oppressive, and burdensome, vague and ambiguous. This request calls  
22 for the production of irrelevant information and documents that exceed the scope of the phase 4  
23 trial.

24 Request 4.

25 This request is overbroad, oppressive, and burdensome, vague and ambiguous. This request calls  
26 for the production of irrelevant information and documents that exceed the scope of the phase 4  
27 trial.

28 Request 5.

1 This request is overbroad, oppressive, and burdensome, vague and ambiguous. This request calls  
2 for the production of irrelevant information and documents that exceed the scope of the phase 4  
3 trial.

4 Request 6.

5 This request is overbroad, oppressive, and burdensome, vague and ambiguous. This request calls  
6 for the production of irrelevant information and documents that exceed the scope of the phase 4  
7 trial.

8 Request 7.

9 This request is overbroad, oppressive, and burdensome regarding the year 2007. This request calls  
10 for the production of irrelevant information and documents that exceed the scope of the phase 4  
11 trial.

12 Request 8.

13 This request is overbroad, oppressive, and burdensome, vague and ambiguous. This request calls  
14 for the production of irrelevant information and documents that exceed the scope of the phase 4  
15 trial.

16 Request 9.

17 This request is overbroad, oppressive, and burdensome, vague and ambiguous. This request calls  
18 for the production of irrelevant information and documents that exceed the scope of the phase 4  
19 trial.

20 Request 10.

21 This request is overbroad, oppressive, and burdensome, vague and ambiguous. This request calls  
22 for the production of irrelevant information and documents that exceed the scope of the phase 4  
23 trial.

24 Request 11.

25 This request is overbroad, oppressive, and burdensome, vague and ambiguous. This request calls  
26 for the production of irrelevant information and documents that exceed the scope of the phase 4  
27 trial.

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Request 12.

This request is irrelevant. This request calls for the production of irrelevant information and documents that exceed the scope of the phase 4 trial.

Request 13.

This request is overbroad, oppressive, and burdensome, vague and ambiguous. This request calls for the production of irrelevant information and documents that exceed the scope of the phase 4 trial. This request calls for documents previously posted to the Superior Court of California, County of Santa Clara, e-filing web site, and are equally available to all parties.

Respectively submitted

CHARLTON WEEKS LLP

Dated: May 15, 2013



Bradley T. Weeks  
Attorney for Quartz Hill Water District

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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 May 15, 2013, at my place of business at Palmdale, California, a copy of the following DOCUMENT(s):

OBJECTION TO NOTICE TO APPEAR AND PRODUCE DOCUMENTS AT TRIAL

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 May 15, 2013

\_\_\_\_\_  
/s/Gayle P.J. Fenald