| 1 2 2 | SMILAND CHESTER LLP William M. Smiland, Esq., (SBN 41928) Theodore A. Chester, Jr., Esq., (SBN 105405) 601 West Fifth Street, Suite 1100 | | |
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| 3 | Los Angeles, California 90071 Telephone: (213) 891-1010 Facsimile: (213) 891-1414 | | |
| 5 | Attorneys for Landinv, Inc., | | |
| 6 | Bruce Burrows and 300 A 40 H, LLC | | |
| 7 | SUPERIOR COURT OF THE STATE OF CALIFORNIA | | |
| 8 9 | COUNTY OF LOS ANGELES | | |
| 10 | | | 'I.C. I''. N. 4400 |
| 11 | Coordination Proceeding Special Title (Rule 1550 (b)) | | cil Coordination No. 4408 Hon. Jack Komar; Dept 17] |
| 12 | ANTELOPE VALLEY GROUNDWATER | Santa Clara Case No.: 1-05-CV-049053 | |
| 13 | CASES) |) LANDVINV, INC.'S REQUEST TO JOHN CALANDRI, JOHN CALANDRI FARMS, | |
| 14 | Included CONSOLIDATED Actions: |) INC., AND S | , JOHN CALANDRI FARMS, ON RISE FARMS TO WITNESSES AND |
| 15 | Los Angeles County Waterworks District No. | | IS AT TRIAL |
| 16 17 | 40 vs. Diamond Farming CompanyLos Angeles Superior Court Case No.BC325201 | Trial Date: May 28, 2013 Time: 9:00 a.m. | |
| 18 | Los Angeles County Waterworks District No. | Dept.: | 1 |
| 19 20 | 40 vs. Diamond Farming Company Kern County Superior Court Case No. S-1500- CV-254348 NFT | | |
| 21 | Diamond Farming Company vs. City of | | |
| 22 | Lancaster Riverside County Superior Court Lead Case |) | |
| 23 | No. RIC 344436 [Consolidated w/ Case Nos. | | |
| 24 | 344668 & 353840] | | |
| 25 | Willis v. Los Angeles County Waterworks District No. 40; Los Angeles Superior Court | | |
| 26 | Case No. BC 364553 | | |
| 27 28 | Wood v. Los Angeles County Waterworks District No. 40; Los Angeles Superior Court Case No. BC 391869 | | |
| | Cuse 110. DC 371007 | | |

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1 LANDINV, INC.'S REQUEST TO PRODUCE WITNESSES AND DOCUMENTS AT TRIAL **NOTICE IS HEREBY GIVEN** that pursuant to Code of Civil Procedure §1987(b) and (c), Landinv, Inc. ("Landinv") requests that Calandri produce witness John Calandri at the trial in the above-captioned matter on May 28, 2013 at 9:00 a.m., in Department 1 of the Los Angeles County Superior Court, located at 111 N. Hill Street, Los Angeles, California, the Honorable Jack Komar presiding, or, if the trial is continued, trailed, or transferred to another location by order of the court, at the new date, time, and location set by the court, to testify as witnesses in this action. Arrangements may be made with the law firm of Smiland Chester LLP in writing for a scheduled appearance after a courtroom is assigned on or after May 28, 2013.

PLEASE TAKE FURTHER NOTICE that pursuant to Code of Civil Procedure §1987(c), Landinv, Inc. requests that Calandri produce the original documents listed below in Calandri's possession or under its control, at the trial of the above-captioned matter at the time and place listed above.

DEFINITIONS

1. The term "DOCUMENT" means all written or graphic matter, however produced, or reproduced, of every kind and description in YOUR actual or constructive possession, custody, care or control, including, without limitation, all writings, drawings, graphs, charts, photographs, blueprints, sketches, sound tapes or recordings, video tapes or recordings, papers, books, accounts, letters, microfilm, magnetic tape, laser discs, magnetic discs, magnetic strips, optical recognition characters, punched paper tapes, microfiche, punched cards, telegrams, wires, cables, invoices, statements, account recommendations, notes, minutes, purchase orders, memoranda including inter-corporate, intra corporate, interoffice, and intra office memoranda, reports, studies, contracts, agreements, correspondence, ledgers, books of account, vouchers, bank checks, manifests, charge slips, expense account reports, hotel charges, receipts, working papers, drafts, maps, surveys, plats, statistical records, cost sheets, stenographer notebooks, calendars, appointment books, diaries, time sheets or logs, computer printouts, computer files, computer discs, electronic mail, websites, computer or other data compilations from which

information can be obtained or translated through detection devices into reasonably usable form, or any other tangible thing that constitutes or contains matters contained within the scope of "writings" as defined by California Evidence Code § 250.

2. The term "RELATE" means to evidence, recount, reflect, report, identify, describe, refer, discuss, summarize, explain or modify.

3. The terms "YOU" or "YOUR" refer to John Calandri, John Calandri Farms, Inc., and Son Rise Farms, and any of their agents, legal representatives, officers or employees.

DOCUMENTS TO BE PRODUCED AT TRIAL

1. The documents prepared by YOU consisting of that certain letter dated December 20, 2011, and the attachments thereto, attached as Exhibit 2 to the Deposition of John Calandri dated April 23, 2013.

2. The documents prepared by YOU consisting of an email and maps, attached as Exhibit 3 to the Deposition of John Calandri dated April 23, 2013.

These requests are made pursuant to Section 1987(b) and (c) of the Code of Civil Procedure, which provide that the giving of this Notice has the same effect as the service of a subpoena and that, in the event of noncompliance with this Notice, the parties shall have such rights, and the Court may make such orders, including the imposition of sanctions, as in the case of a subpoena for attendance before the court.

Dated: May 8, 2013

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SMILAND CHESTER LLP

By:/s/ Theodore A. Chester, Jr. Theodore A. Chester, Jr., Attorneys for Landinv, Inc.

PROOF OF SERVICE

STATE OF CALIFORNIA)) COUNTY OF LOS ANGELES)

I, Felicia Herbstreith am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is: 601 West Fifth Street, Suite 1100, Los Angeles, California 90071.

On May 8, 2013, I served the foregoing document described as: LANDINV, INC.'S REQUEST TO JOHN CALANDRI, JOHN CALANDRI FARMS, INC., AND SON RISE FARMS TO PRODUCE WITNESSES AND DOCUMENTS AT TRIAL on the interested parties in this action by posting the document listed above to the Santa Clara County Superior website in regard to the Antelope Valley Groundwater Adjudication matter, pursuant to the Electronic Filing and Service Standing Order of Judge Komar.

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

Executed on May 8, 2013, at Los Angeles, California.

/s/ Felicia Herbstreith Felicia Herbstreith