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9 Bruce Burrows and 300 A 40 H, LLC

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF LOS ANGELES

12 Coordination Proceeding Special Title)
13 (Rule 1550 (b)))

Judicial Council Coordination No. 4408
[Assigned to Hon. Jack Komar; Dept 17]

14 **ANTELOPE VALLEY GROUNDWATER**)
15 **CASES**)

Santa Clara Case No.: 1-05-CV-049053

16 Included **CONSOLIDATED** Actions:)

LANDVINV, INC.'S REQUEST TO JOHN
CALANDRI, JOHN CALANDRI FARMS,
INC., AND SON RISE FARMS TO
PRODUCE WITNESSES AND
DOCUMENTS AT TRIAL

17 Los Angeles County Waterworks District No.)
18 40 vs. Diamond Farming Company)
19 Los Angeles Superior Court Case No.)
20 BC325201)

Trial Date: May 28, 2013
Time: 9:00 a.m.
Dept.: 1

21 Los Angeles County Waterworks District No.)
22 40 vs. Diamond Farming Company)
23 Kern County Superior Court Case No. S-1500-)
24 CV-254348 NFT)

25 Diamond Farming Company vs. City of)
26 Lancaster)
27 Riverside County Superior Court Lead Case)
28 No. RIC 344436 [Consolidated w/ Case Nos.)
344668 & 353840]

Willis v. Los Angeles County Waterworks)
District No. 40; Los Angeles Superior Court)
Case No. BC 364553)

Wood v. Los Angeles County Waterworks)
District No. 40; Los Angeles Superior Court)
Case No. BC 391869)

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

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

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

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9 **DOCUMENTS TO BE PRODUCED AT TRIAL**

10 1. The documents prepared by YOU consisting of that certain letter dated December
11 20, 2011, and the attachments thereto, attached as Exhibit 2 to the Deposition of John Calandri
12 dated April 23, 2013.

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

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

20 Dated: May 8, 2013

SMILAND CHESTER LLP

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22 By: /s/ Theodore A. Chester, Jr.
Theodore A. Chester, Jr.,
23 Attorneys for Landinv, Inc.
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1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA)
3)
4 COUNTY OF LOS ANGELES)

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

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

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

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

17
18 /s/ Felicia Herbstreith
19 Felicia Herbstreith
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