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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**  
**GRIMMWAY ENTERPRISES, INC.,**  
**DIAMOND FARMING COMPANY AND**  
**CRYSTAL ORGANIC 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 computer discs, electronic mail, websites, computer or other data compilations from which  
2 information can be obtained or translated through detection devices into reasonably usable form,  
3 or any other tangible thing that constitutes or contains matters contained within the scope of  
4 “writings” as defined by California Evidence Code § 250.

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

7 3. The terms “YOU” or “YOUR” refer to Grimmway Enterprises, Inc., Diamond  
8 Farming Company, and Crystal Organic Farms, and any of their agents, legal representatives,  
9 officers or employees.

10  
11 **DOCUMENTS TO BE PRODUCED AT TRIAL**

12 1. The documents prepared by YOU consisting of water meter reading records,  
13 attached as Exhibit 28 to the Deposition of Carl F. Voss, Jr., dated January 10, 2013.

14 2. The documents prepared by YOU consisting of pump test reports, attached as  
15 Exhibit 29 to the Deposition of Carl F. Voss, Jr., dated January 10, 2013.

16 3. The documents prepared by YOU consisting of crop maps, attached as Exhibit 30  
17 to the Deposition of Carl F. Voss, Jr., dated January 10, 2013.

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

23 Dated: May 8, 2013

SMILAND CHESTER LLP

24  
25 By: /s/ Theodore A. Chester, Jr.  
Theodore A. Chester, Jr.,  
26 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 GRIMMWAY ENTERPRISES, INC., DIAMOND FARMING COMPANY**  
10 **AND CRYSTAL ORGANIC FARMS TO PRODUCE WITNESSES AND DOCUMENTS**  
11 **AT TRIAL** on the interested parties in this action by posting the document listed above to the  
12 Santa Clara County Superior website in regard to the Antelope Valley Groundwater Adjudication  
13 matter, pursuant to the 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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