1 2 3 4 5 6	SMILAND CHESTER LLP William M. Smiland, Esq., (SBN 41928) Theodore A. Chester, Jr., Esq., (SBN 105405) 601 West Fifth Street, Suite 1100 Los Angeles, California 90071 Telephone: (213) 891-1010 Facsimile: (213) 891-1414 Attorneys for Landiny, Inc., Bruce Burrows and 300 A 40 H, LLC			
7	SUPERIOR COURT OF THE STATE OF CALIFORNIA			
8	COUNTY OF LOS ANGELES			
9				
10	Coordination Proceeding Special Title (Rule 1550 (b))	Judicial Council Coordination No. 4408 [Assigned to Hon. Jack Komar; Dept 17]		
**	(Rule 1330 (b))	Santa Clara Case No.: 1-05-CV-049053		
12	ANTELOPE VALLEY GROUNDWATER ()			
14	Included CONSOLIDATED Actions:	GRIMMWA DIAMOND I	, INC.'S REQUEST TO Y ENTERPRISES, INC., FARMING COMPANY AND	
15 16	Los Angeles County Waterworks District No. 340 vs. Diamond Farming Company Los Angeles Superior Court Case No. 360 pc 225201	CRYSTAL ORGANIC FARMS TO PRODUCE WITNESSES AND DOCUMENTS AT TRIAL		
17 18	BC325201	Trial Date: Time: Dept.:	May 28, 2013 9:00 a.m.	
19	Los Angeles County Waterworks District No. 40 vs. Diamond Farming Company	Бери	1	
20	Kern County Superior Court Case No. S-1500- CV-254348 NFT) 		
21	Diamond Farming Company vs. City of			
22	Lancaster			
23	Riverside County Superior Court Lead Case No. RIC 344436 [Consolidated w/ Case Nos.			
24	344668 & 353840]	1		
25	Willis v. Los Angeles County Waterworks District No. 40; Los Angeles Superior Court) 		
26	Case No. BC 364553)		
27	Wasda Las And L. C. of W.))		
28	Wood v. Los Angeles County Waterworks District No. 40; Los Angeles Superior Court Case No. BC 391869))		

TO GRIMMWAY ENTERPRISES, INC., DIAMOND FARMING COMPANY, AND CRYSTAL ORGANIC FARMS (COLLECTIVELY, "GRIMMWAY") AND THEIR ATTORNEYS OF RECORD:

NOTICE IS HEREBY GIVEN that pursuant to Code of Civil Procedure §1987(b) and (c), Landinv, Inc. ("Landinv") requests that Grimmway produce witness Carl F. Voss, Jr. 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 Grimmway produce the original documents listed below in Grimmway'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,

2.7

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 Grimmway Enterprises, Inc., Diamond Farming Company, and Crystal Organic 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 water meter reading records, attached as Exhibit 28 to the Deposition of Carl F. Voss, Jr., dated January 10, 2013.
- 2. The documents prepared by YOU consisting of pump test reports, attached as Exhibit 29 to the Deposition of Carl F. Voss, Jr., dated January 10, 2013.
- 3. The documents prepared by YOU consisting of crop maps, attached as Exhibit 30 to the Deposition of Carl F. Voss, Jr., dated January 10, 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 SMILAND CHESTER LLP

Bv:/s/ Theodore A. Chester, Jr., Theodore A. Chester, Jr., Attorneys for Landiny, Inc.

	PROOF OF SERVICE
	STATE OF CALIFORNIA)
Ш	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 GRIMMWAY ENTERPRISES, INC., DIAMOND FARMING COMPANY
	AND CRYSTAL ORGANIC 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