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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: )

**BRUCE BURROWS AND 300 A 40 H,**  
**LLC'S REQUEST TO TEJON RANCH**  
**COMPANY AND TEJON RANCHCORP**  
**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                   **TO TEJON RANCH COMPANY AND TEJON RANCHCORP**  
2 **(COLLECTIVELY, "TEJON") AND THEIR ATTORNEYS OF RECORD:**

3           **NOTICE IS HEREBY GIVEN** that pursuant to Code of Civil Procedure §1987(b) and  
4 (c), Bruce Burrows and 300 A 40 H, LLC (collectively "Burrows") requests that Tejon produce  
5 witness Dennis Atkinson at the trial in the above-captioned matter on May 28, 2013 at 9:00 a.m.,  
6 in Department 1 of the Los Angeles County Superior Court, located at 111 N. Hill Street, Los  
7 Angeles, California, the Honorable Jack Komar presiding, or, if the trial is continued, trailed, or  
8 transferred to another location by order of the court, at the new date, time, and location set by the  
9 court, to testify as witnesses in this action. Arrangements may be made with the law firm of  
10 Smiland Chester LLP in writing for a scheduled appearance after a courtroom is assigned on or  
11 after May 28, 2013.

12           **PLEASE TAKE FURTHER NOTICE** that pursuant to Code of Civil Procedure  
13 §1987(c), Burrows' requests that Tejon produce the original documents listed below in Tejon's  
14 possession or under its control, at the trial of the above-captioned matter at the time and place  
15 listed above.

16   **DEFINITIONS**

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

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 Tejon Ranch Company and Tejon  
8 Ranchcorp, and any of their agents, legal representatives, officers or employees.

9  
10 **DOCUMENTS TO BE PRODUCED AT TRIAL**

11 1. The documents prepared by YOU consisting of crop maps for the period from  
12 2000 through 2012 for the parcel identified as Assessor Tax Number 3275-007-013 on Exhibit B  
13 of YOUR December 21, 2012 Response to Discovery Order for Phase IV Trial.

14 2. The documents prepared by YOU consisting of records that relate to groundwater  
15 pumpage for the period from 2000 through 2012 for the parcel identified as Assessor Tax  
16 Number 3275-007-013 on Exhibit B of YOUR December 21, 2012 Response to Discovery Order  
17 for Phase IV Trial.

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.  
26 Theodore A. Chester, Jr.,  
27 Attorneys for Landinv, Inc.  
28 Bruce Burrows and 300 A 40  
H, LLC

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**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: **BRUCE BURROWS AND 300 A 40 H, LLC’S REQUEST TO TEJON RANCH COMPANY AND TEJON RANCHCORP 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