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4

Attorneys for Cross-defendants,
5 LITTLE ROCK SAND AND GRAVEL, INC.,
a California Corporation;
6 THE GEORGE AND CHARLENE LANE FAMILY TRUST;
THE FRANK AND YVONNE LANE 1993 FAMILY
7 TRUST, DATED MARCH 5, 1993, AS RESTATED
JULY 20, 2000; MONTE VISTA BUILDING SITES, INC.,
8 a California Corporation; A.V. MATERIALS, INC.,
a California Corporation;
9 HOLLIDAY ROCK CO., INC.,
successor in interest to
10 LITTLE ROCK AGGREGATE CO., INC. dba
ANTELOPE VALLEY AGGREGATE, INC.;
11 LITTLE ROCK AGGREGATE CO., INC. dba
ANTELOPE VALLEY AGGREGATE, INC.
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13
14 SUPERIOR COURT OF THE STATE OF CALIFORNIA

15 FOR THE COUNTY OF LOS ANGELES

16 ANTELOPE VALLEY GROUNDWATER CASES) Judicial Council Coordination No.
4408
17 Included Actions:)
18 Los Angeles County Waterworks)
District No. 40 v. Diamond)
19 Farming Co. Superior Court of)
California County of Los Angeles,) [Assigned to the Honorable Jack
20 Case No. BC 325 201) Komar]
21 Los Angeles County Waterworks 2)
District No. 40 v. Diamong)
22 Farming Co. Superior court of)
Califronia, County of Kern, Case)
23 No. S-1500-CV-254-348)
24 Wm. Bolthouse Farms, Inc. V. City)
NOTICE TO GRIMMWAY ENTERPRSES,
INC., DIAMOND FARMING COMPANY
AND CRYSTAL ORGANIC FARMS TO
APPEAR AND PRODUCE
DOCUMENTS AT TRIAL
Date: May 28, 2013
Time: 9:00 a.m.
Place: 111 N. Hill Street
Los Angeles, CA

1 of Lancaster Diamong Farming Co.) Dept.: TBD
V. City of Lancaster Diamond)
2 Farming Co. V. Palmdale Water)
Dist. Superior Court of)
3 California, County of Riverside,)
consolidated actions, Case No.)
4 RIC 353 840, RIC 344 436, RIC 344)
668)

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6 PLEASE TAKE NOTICE that PURSUANT TO Code of Civil Procedure
7 section 1987(b) and (c) these cross-defendants request that
8 GRIMMWAY ENTERPRISES, INC., DIAMOND FARMING COMPANY and CRYSTAL
9 ORGANIC FARMS (collectively "GRIMMWAY") produce witness Carl F.
10 Voss, Jr. at the trial in the above-captioned matter on on May
11 28, 2013 at 9:00 a.m. in Department "1" of the Los Angeles
12 Superior Court, located at 111 North Hill Street, Los Angeles,
13 California, or such other location as may be ordered by the
14 court, to testify as witnesses in this case.

15 PLEASE TAKE FURTHER NOTICE THAT pursuant to Code of Civil
16 Procedure section 1987(c) these cross-defendants request that
17 GRIMMWAY produce the original documents listed in the attached
18 Exhibit A, which GRIMMWAY and Carl Voss have in their possession
19 or under their control.

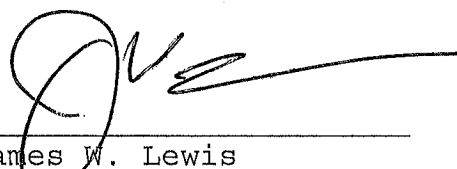
20 These requests are made pursuant to section 1987(b) and (c)
21 of the Code of Civil Procedure, which provide that the giving of
22 this notice has the same effect as the service of a subpoena and
23 that, in the event of noncompliance with this notice, the
24 parties shall have such rights, and the court may make such

1 orders, including the imposition of sanctions, as in the case of
2 a subpoena for attendance before the court.

3 Dated: May 8, 2013

TAYLOR & RING

4
5
6 By:



James W. Lewis
Attorneys for Cross-
Defendants HOLLIDAY ROCK
CO., INC., successor in
interest to LITTLE ROCK
AGGREGATE CO., INC. dba
ANTELOPE VALLEY
AGGREGATE, INC.; THE
FRANK AND YVONNE LANE
1993 FAMILY TRUST, DATED
MARCH 5, 1993, AS
RESTATED JULY 20, 2000,
successor in interest to
FRANK A. LANE, ROE 612;
THE GEORGE AND CHARLENE
LANE FAMILY TRUST,
Successor in interest to
George M. Lane, Roe 316;
MONTE VISTA BUILDING
SITES, INC., a
California Corporation;
A.V. MATERIALS, INC., a
California Corporation,
ROE 9; A.C. WARNACK,
as Trustee of the A.C.
WARNACK TRUST; LITTLE
ROCK SAND AND GRAVEL,
INC.

1 EXHIBIT A

2 I. DEFINITIONS

3 The following words and phrases shall govern the
4 construction of this document unless the context otherwise
5 requires:

6 1. "DOCUMENTS" means "writing" as defined by Evidence Code
7 section 250 and includes drafts, originals and duplicates of
8 written, graphic, computer or otherwise recorded matters,
9 whether stored in written, electronic, magnetic or photographic
10 format or by any other means.

11 2. "GRIMMWAY" shall mean GRIMMWAY ENTERPRISES, INC.,
12 DIAMOND FARMING COMPANY and CRYSTAL ORGANIC FARMS, any of their
13 agents, representatives, officers or employees.

14 II. DOCUMENTS TO BE PRODUCED

15 1. The DOCUMENTS prepared by GRIMMWAY consisting of water
16 meter records, attached as Exhibit 23 to the deposition of Carl
17 F. Voss, dated January 10, 2013.

18 2. The DOCUMENTS prepared by GRIMMWAY consisting of pump
19 test reports, attached as Exhibit 24 to the Deposition of Carl
20 F. Voss, dated January 10, 2013.

21 3. The documents prepared by GRIMMWAY consisting of crop
22 maps and well maps, attached as Exhibits 21 and 22 to the
23 Deposition of Carl F. Voss, Jr. dated January 10, 2013.

