

1 James W. Lewis (SBN 207599)
TAYLOR & RING
2 10900 Wilshire Boulevard, Suite 920
Los Angeles, California 90024
3 Telephone: (310) 209-4100
Facsimile: (310) 208-5052
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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.
12

13 SUPERIOR COURT OF THE STATE OF CALIFORNIA
14 FOR THE COUNTY OF LOS ANGELES
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16 ANTELOPE VALLEY GROUNDWATER CASES)	Judicial Council Coordination No.
)	4408
17 Included Actions:)	For filing purposes only:
)	Santa Clara County Case No.
18 Los Angeles County Waterworks)	1-05-CV-049053
District No. 40 v. Diamond)	
19 Farming Co. Superior Court of)	[Assigned to the Honorable Jack
California County of Los Angeles,)	Komar]
20 Case No. BC 325 201)	NOTICE TO JOHN CALANDRI, SON
)	RISE FARMS, INC., AND JOHN
21 Los Angeles County Waterworks 2)	CALANDRI FARMS, INC. TO APPEAR
District No. 40 v. Diamong)	AND PRODUCE DOCUMENTS AT TRIAL
22 Farming Co. Superior court of)	
California, County of Kern, Case)	Date: May 28, 2013
23 No. S-1500-CV-254-348)	Time: 9:00 a.m.
)	Place: 111 N. Hill Street
24 Wm. Bolthouse Farms, Inc. V. City)	Los Angeles, CA
)	Dept.: TBD

1 of Lancaster Diamong Farming Co.)
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 JOHN
8 CALANDRI, SON RISE FARMS, INC., and JOHN CALANDRI FARMS, INC.
9 (collectively "CALANDRI") produce witness John Calandri at the
10 trial in the above-captioned matter on on May 28, 2013 at 9:00
11 a.m. in Department "1" of the Los Angeles Superior Court,
12 located at 111 North Hill Street, Los Angeles, California, or
13 such other location as may be ordered by the court, to testify
14 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 CALANDRI produce the original documents listed in the attached
18 Exhibit A, which CALANDRI has in their possession or under their
19 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

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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. "CALANDRI" shall mean JOHN CALANDRI, SON RISE FARMS,
12 INC., and JOHN CALANDRI FARMS, INC., any of their agents,
13 representatives, officers or employees.

14 **II. DOCUMENTS TO BE PRODUCED**

15 1. The DOCUMENTS prepared by CALANDRI consisting of crop
16 maps relating to the crops grown on the approximately 320 acre
17 real property CALANDRI leased from George Lane, Frank Lane, the
18 George and Charlene Lane Family trust and/or their related
19 agents and/or entities between 2000 and 2007 that is located at
20 approximately 170th Street West and Avenue A in Rosamond,
21 California, which were attached as exhibits to his deposition
22 that was taken in this matter on or about April 23, 2013.

23 2. The DOCUMENTS prepared by CALANDRI consisting of
24 pesticide and/or pest control records which relate to crops

1 grown on the approximately 320 acre real property CALANDRI
2 leased from George Lane, Frank Lane, the George and Charlene
3 Lane Family trust and/or their related agents and/or entities
4 between 2000 and 2007 that is located at approximately 170th
5 Street West and Avenue A in Rosamond, California, which were
6 attached as exhibits to his deposition that was taken in this
7 matter on or about April 23, 2013.

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