

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
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.
12

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:)	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 SOUTHERN CALIFORNIA
)	EDISON COMPANY TO APPEAR
21 Los Angeles County Waterworks 2)	AND PRODUCE DOCUMENTS AT TRIAL
District No. 40 v. Diamong)	
22 Farming Co. Superior court of)	Date: May 28, 2013
Califronia, County of Kern, Case)	Time: 9:00 a.m.
23 No. S-1500-CV-254-348)	Place: 111 N. Hill Street
)	Los Angeles, CA
24 <u>Wm. Bolthouse Farms, Inc. V. City</u>)	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)

5
6 PLEASE TAKE NOTICE that PURSUANT TO Code of Civil Procedure
7 section 1987(b) and (c) these cross-defendants request that
8 SOUTHERN CALIFORNIA EDISON COMPANY produce witness Frederick
9 John Koch, III at the trial in the above-captioned matter on on
10 May 28, 2013 at 9:00 a.m. in Department "1" of the Los Angeles
11 Superior Court, located at 111 North Hill Street, Los Angeles,
12 California, or such other location as may be ordered by the
13 court, to testify as witnesses in this case.

14 PLEASE TAKE FURTHER NOTICE THAT pursuant to Code of Civil
15 Procedure section 1987(c) these cross-defendants request that
16 CALANDRI produce the original documents listed in the attached
17 Exhibit A, which SOUTHERN CALIFORNIA EDISON COMPANY and
18 Frederick John Koch, III have 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

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. "SOUTHERN CALIFORNIA EDISON" shall mean SOUTHERN
12 CALIFORNIA EDISON COMPANY, Frederick John Koch, III, any of
13 their agents, representatives, officers or employees.

14 II. DOCUMENTS TO BE PRODUCED

15 1. The DOCUMENTS prepared by SOUTHERN CALIFORNIA EDISON
16 COMPANY consisting of electrical past billing histories relating
17 to real properties owned by George Lane, the George and Charlene
18 Lane Family Trust, and/or the Frank and Yvonne Lane Family
19 Trust, which are attached as Exhibits 17, 22 and 23 to the
20 deposition of Frederick John Koch, III, which was taken on April
21 10, 2013 in this matter.

22 2. The DOCUMENTS prepared by SOUTHERN CALIFORNIA EDISON
23 COMPANY consisting of Hydraulic Test Results and Pumping Cost
24 Analysis for groundwater pumps, booster pumps, turbine booster

1 pumps, and turbine well pumps relating to real properties owned
2 by George Lane, the George and Charlene Lane Family Trust, the
3 Frank and Yvonne Lane Family Trust, Holliday Rock Company,
4 Littlerock Sand and Gravel, Inc., Littlerock Aggregate, Inc. dba
5 Antelope Valley Aggregate, which are attached as Exhibits 13,
6 14, 18, 19, and 21 to the deposition of Frederick John Koch,
7 III, which was taken on April 10, 2013 in this matter.

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

PROOF OF SERVICE
(C.C.P. 1013A, 2015.5)

STATE OF CALIFORNIA

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen years and not a party to the within action; my business address is 10900 Wilshire Boulevard, Suite 920, Los Angeles, California 90024.

On May 8, 2013, I served the foregoing document, described as:

NOTICE TO SOUTHERN CALIFORNIA EDISON COMPANY TO APPEAR AND PRODUCE DOCUMENTS AT TRIAL

on the interested parties in this action in the following manner:

X **BY ELECTRONIC SERVICE AS FOLLOWS** by posting the document(s) listed above to the Santa Clara website in the action of the *Antelope Valley Groundwater Litigation*, Judicial Council Coordination Proceeding No. 4408, Santa Clara Case No. 1-05-CV-049053.

Executed on May 8, 2013 at Los Angeles, California.

XX **(State)** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

James W. Lewis

