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Agricultural Association

EXEMPT FROM FILING FEES
[Gov. Code, § 6103]

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF LOS ANGELES

10
11
12
13 **Coordination Proceeding**
Special Title (Rule 3.550(c))

14 **ANTELOPE VALLEY GROUNDWATER**
15 **CASES**
16 **Included Actions:**

17 **Los Angeles County Waterworks District**
No. 40 v. Diamond Farming Co.
18 **Superior Court of California County of Los**
Angeles, Case No. BC 325 201

19 **Los Angeles County Waterworks District**
No. 40 v. Diamond Farming Co.
20 **Superior Court of California County of**
Kern, Case No. S-1500-CV-254-348

21 **Wm. Bolthouse Farms, Inc. v. City of**
22 **Lancaster, Diamond Farming Co. v. City of**
23 **Lancaster, Diamond Farming Co. v.**
24 **Palmdale Water Dist. Superior Court of**
California, County of Riverside,
25 **consolidated Actions, Case Nos. RIC 353**
840, RIC 344 436, RIC 344 668
26 -----

27 **AND RELATED ACTIONS.**
28

Judicial Council Coordination
Proceeding No. 4408

Santa Clara Case No. 1-05-CV-049053

STATE OF CALIFORNIA, SANTA
MONICA MOUNTAINS
CONSERVANCY, AND STATE OF
CALIFORNIA 50TH DISTRICT
AGRICULTURAL ASSOCIATION'S
PRIOR DISCOVERY RESPONSES AND
VERIFICATIONS

[Assigned for All Purposes to the Honorable
Jack Komar]

Date: February 11, 2013

Time: 9:00 a.m.

Dept: 1

Action Filed: October 26, 2005

Attached please find the following Discovery Responses served in 2007 and 2008:

1. State Parties' Responses to Specially Prepared Interrogatories; Set No. 1 – dated July 11, 2007.
2. Defendant, State of California's Response to Rebecca Willis' First Set of Special Interrogatories Propounded on Each Overlying Landowner and Mutually Water Company Listed on Exhibit 1 – dated July 18, 2008.
3. Defendant, State of California's Response to Rebecca Willis' Form Interrogatories – dated July 18, 2008.
4. Defendant, State of California's Response to Rebecca Willis' Request For Admissions Propounded on Each Overlying Landowner and Mutually Water Company Listed on Exhibit 1 – dated July 18, 2008.
5. Defendant, State of California's Response to Rebecca Willis' Request For Production of Documents Propounded on Each Overlying Landowner and Mutual Water Company Listed on Exhibit 1 – dated July 18, 2008.

Dated: December 21, 2012

Respectfully Submitted,

KAMALA D. HARRIS
Attorney General of California



MARILYN H. LEVIN
Deputy Attorney General
*Attorneys for State of California, Santa
Monica Mountains Conservancy, and 50th
District Agricultural Association*

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13 SUPERIOR COURT OF CALIFORNIA

14 COUNTY OF LOS ANGELES

15 Coordination Proceeding Special title (Rule 1550(b))

16 ANTELOPE VALLEY GROUNDWATER CASES:

17 Included Actions:

18 Los Angeles County Waterworks District No. 40 v.
Diamond Farming Co.
19 Superior Court of California, County of Los Angeles,
Case No.: BC 325 201

20 Los Angeles County Waterworks District No. 40 v.
21 Diamond Farming Co.
Superior Court of California, County of Kern, Case No.:
22 S-1500-CV-254-348

23 Wm. Bolthouse Farms, Inc. v. City of Lancaster
Diamond Farming Co. v. City of Lancaster
24 Diamond Farming Co. v. Palmdale Water District
Superior Court of California, County of Riverside,
25 consolidated actions, Case Nos. RIC 353 840, RIC 344
436, RIC 344 668
26

Judicial Council Coordination
Proceeding No.: 4408

Case No.: 1-05-CV-049053

**STATE PARTIES'
RESPONSES TO SPECIALLY
PREPARED
INTERROGATORIES, SET
NO. 1**

27 Propounding Parties:

City of Palmdale
City of Lancaster

28 Los Angeles County Waterworks District No. 40
Palmdale Water District

Quartz Hill Water District
Littlerock Creek Irrigation District
Palm Ranch Irrigation District
Rosamond Community Services District
California Water Service Company, successor in
interest to Antelope Valley Water Company

Responding Parties

State of California
Santa Monica Mountains Conservancy
50th District Agricultural Association

Set Number

One

The State of California, Santa Monica Mountains Conservancy, and 50th District
Agricultural Association ("State Parties") hereby respond to the First Set of Specially Prepared
Interrogatories propounded by the Propounding Parties listed above ("PUBLIC WATER
SUPPLIERS").

When used in these responses, the words "BASIN," "IDENTIFY," "PROPERTY,"
"PROPERTY OWNER," and "PUBLIC WATER SUPPLIERS" have the same meanings as in
the Interrogatories being responded to.

State Parties have not completed formal discovery in this case, have not completed their
investigation of the facts, and their responses to the following interrogatories are therefore
preliminary and may not be complete. The following responses are based on information
presently available and specifically known to State Parties and are given without prejudice to
their right to produce evidence of any subsequently discovered facts.

SPECIAL INTERROGATORY NO. 1:

If you have asserted an affirmative defense in response to any complaint or cross-
complaint in these proceedings that alleges that the complaining party has failed to join an
indispensable party, please IDENTIFY any such indispensable party.

RESPONSE TO SPECIAL INTERROGATORY NO. 1:

State Parties object to this Special Interrogatory insofar as it calls on them to IDENTIFY
the indispensable parties who have not yet been joined in this action, on the ground that such
information is equally available to the PUBLIC WATER SUPPLIERS as to responding State
Parties. The information is largely available in public records. Insofar as the Special

1 Interrogatory calls for State Parties to IDENTIFY all indispensable parties not yet joined, State
2 Parties object that it is burdensome and oppressive. Without waiving these objections, State
3 Parties respond that based on representations made at court hearings in this matter, they are
4 informed and believe that there are overlying landowners owning less than 100 acres of land who
5 have not been joined and have not yet been made part of a certified class.

6 **SPECIAL INTERROGATORY NO. 2:**

7 If you have asserted an affirmative defense in response to any complaint or cross-
8 complaint in these proceedings that alleges that the complaining party has failed to join a
9 necessary party, please IDENTIFY any such necessary party.

10 **RESPONSE TO SPECIAL INTERROGATORY NO. 2:**

11 State Parties object to this Special Interrogatory insofar as it calls on them to IDENTIFY
12 the necessary parties who have not yet been joined in this action, on the ground that such
13 information is equally available to the PUBLIC WATER SUPPLIERS as to responding State
14 Parties. Much of the information is available in public records. Insofar as the Special
15 Interrogatory calls for State Parties to IDENTIFY all necessary parties, State Parties object that it
16 is burdensome and oppressive. Without waiving these objections, State Parties respond that
17 based on representations made at court hearings in this matter, they are informed and believe that
18 there are overlying landowners owning less than 100 acres of land who have not been joined and
19 have not yet been made part of a certified class.

20 **SPECIAL INTERROGATORY NO. 3:**

21 Are you aware of any PROPERTY within the BASIN for which the PROPERTY
22 OWNER has not been named as a party to these proceedings?

23 **RESPONSE TO SPECIAL INTERROGATORY NO. 3:**

24 State Parties are not at this time aware of any specific PROPERTY within the BASIN for
25 which the PROPERTY OWNER has not been named as a party to these proceedings.

26 **SPECIAL INTERROGATORY NO. 4:**

27 If your response to Interrogatory No. 3 is affirmative, please IDENTIFY the PROPERTY.
28

1 **RESPONSE TO SPECIAL INTERROGATORY NO. 4:**

2 Not applicable.

3 **SPECIAL INTERROGATORY NO. 5:**

4 If your response to Interrogatory No. 3 is affirmative, please identify the PROPERTY
5 OWNER.

6 **RESPONSE TO SPECIAL INTERROGATORY NO. 5:**

7 Not applicable.

8 **SPECIAL INTERROGATORY NO. 6:**

9 If your response to Interrogatory No. 3 is affirmative, please state whether you believe
10 that groundwater has been pumped up from that PROPERTY.

11 **RESPONSE TO SPECIAL INTERROGATORY NO. 6:**

12 Not applicable.

13 **SPECIAL INTERROGATORY NO. 7:**

14 If your response to Interrogatory No. 3 is affirmative, please state whether you believe that
15 groundwater is currently being pumped from that PROPERTY.

16 **RESPONSE TO SPECIAL INTERROGATORY NO. 7:**

17 Not applicable.

18 **SPECIAL INTERROGATORY NO. 8:**

19 Please state the name of any other person or entity you believe is an indispensable party to
20 these proceedings.

21 **RESPONSE TO SPECIAL INTERROGATORY NO. 8:**

22 State Parties object to this Special Interrogatory, which asks them to name the
23 indispensable parties who have not yet been joined in this action, on the ground that such
24 information is equally available to the PUBLIC WATER SUPPLIERS as to responding State
25 Parties. The information is largely available in public records. Insofar as the Special
26 Interrogatory calls for State Parties to name all indispensable parties not yet joined, State Parties
27 object that it is burdensome and oppressive. See Response to Interrogatory No. 1.

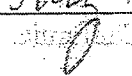
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1 SPECIAL INTERROGATORY NO. 9:

2 Please state the name of any other person or entity you believe is a necessary party to these
3 proceedings.

4 RESPONSE TO SPECIAL INTERROGATORY NO. 9:

5 State Parties object to this Special Interrogatory, which asks them to name the necessary
6 parties who have not yet been joined in this action, on the ground that such information is equally
7 available to the PUBLIC WATER SUPPLIERS as to responding State Parties. The information is
8 largely available in public records. Insofar as the Special Interrogatory calls for State Parties to
9 name all necessary parties not yet joined, State Parties object that it is burdensome and oppressive.
10 See Response to Special Interrogatory No. 2.

11
12 Dated: July 11, 2007
13 

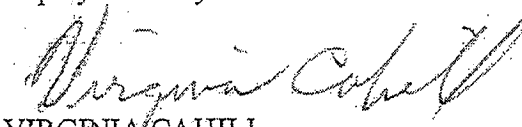
Respectfully submitted,

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MICHAEL L. CROW
Deputy Attorney General

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20 
VIRGINIA CAHILL

21 Deputy Attorney General

22 Attorneys for Attorneys for Defendant State of
23 California; Santa Monica Mountains
24 Conservancy; 50th District Agricultural
25 Association
26
27
28

VERIFICATION

I, Warren Dingman, declare as follows:

I am Associate Planner of the California Department of Parks and Recreation, an agency of the State of California; one of the parties hereto; I am authorized to make this verification for and on behalf of said entity; I have read the foregoing Responses to Interrogatories and know the contents thereof. The matters stated in those Responses are true on my own knowledge except as to matters stated on information and belief and as to those matters I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 9, 2007, in Lancaster, California.

By Warren Dingman

ANTELOPE VALLEY GROUNDWATER CASES
Los Angeles County Superior Court
Judicial Council Coordination Proceeding No. 4408

VERIFICATION

I, Dan Jacobs, declare as follows:

I am Chief Executive Officer of Cross-defendant 50th District Agricultural Association, one of the parties hereto; I am authorized to and make this verification for and on behalf of said entity; I have read the foregoing Responses to Interrogatories propounded by the Public Water Suppliers and know the contents thereof. The matters stated in those Responses are true on my own knowledge except as to matters stated on information and belief and as to those matters I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 5th, 2007, in Lancaster, California.

By



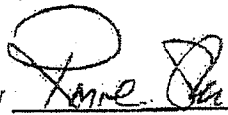
VERIFICATION

I, Rorie Stei, declare as follows:

I am Chief Deputy Director of Cross-defendant Santa Monica Mountains Conservancy, one of the parties hereto; I am authorized to make this verification for and on behalf of said entity; I have read the foregoing Responses to Interrogatories and know the contents thereof. The matters stated in those Responses are true on my own knowledge except as to matters stated on information and belief and as to those matters I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 9, 2007, in Calabasas, California.

By 

DECLARATION OF SERVICE

CASE: **ANTELOPE VALLEY GROUNDWATER CASES,
LOS ANGELES COUNTY SUPERIOR COURT
JUDICIAL COUNCIL COORDINATED PROCEEDINGS NO. 4408**

I, declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar at which member's direction this service is made. I am 18 years of age or older and not a party to this matter; my business address is: 1300 I Street, P.O. Box 944255, Sacramento, California 94244-2550.

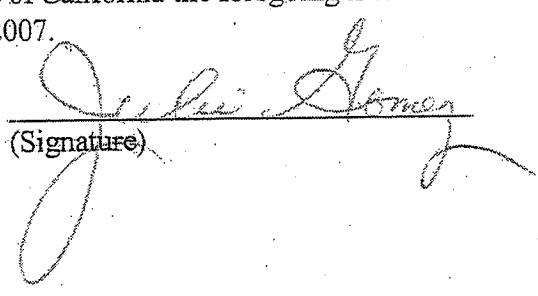
On July 11, 2007, I served the **STATE PARTIES' RESPONSES TO SPECIALLY PREPARED INTERROGATORIES, SET NO. 1.**

X Posting the document(s) listed above to the Santa Clara County Superior Court web site in regard to the Antelope Valley Groundwater matter on July 11, 2007.

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on July 11, 2007.

Declarant

Julie Gomez



(Signature)

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District and Agricultural Association
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10 SUPERIOR COURT OF CALIFORNIA

11 COUNTY OF LOS ANGELES

12 Coordination Proceeding
Special Title (Rule 1550(b)).

Judicial Council Coordination
Proceeding No. 4408

13 ANTELOPE VALLEY GROUNDWATER
CASES

Assigned to The Honorable
Jack Komar

14 Included Actions:

15 Los Angeles County Waterworks District No. 40 v.
Diamond Farming Co.
16 Superior Court of California County of Los Angeles,
Case No. BC 325-201

DEFENDANT, STATE OF
CALIFORNIA'S RESPONSE TO
REBECCA WILLIS' FIRST SET OF
SPECIAL INTERROGATORIES
PROPOUNDED ON EACH
OVERLYING LANDOWNER AND
MUTUALLY WATER COMPANY
LISTED ON EXHIBIT 1

17 Los Angeles County Waterworks District No. 40 v.
18 Diamond Farming Co.
Superior Court of California, County of Kern,
19 Case No. S-1500-CV-254-348

20 Wm. Bellhouse Farms, Inc. v. City of Lancaster
Diamond Farming Co. v. City of Lancaster
21 Diamond Farming Co. v. Palmdale Water Dist.
Superior Court of California, County of Riverside,
22 consolidated Actions, Case Nos. RIC 353-840, RIC
344-436, RIC 344-668
23

24 AND RELATED ACTIONS.
25
26
27
28

1 PROPOUNDING PARTY: REBECCA WILLIS

2 RESPONDING PARTY: STATE OF CALIFORNIA, SANTA MONICA MOUNTAINS
3 CONSERVANCY, AND STATE OF CALIFORNIA 50TH
4 DISTRICT AND AGRICULTURAL ASSOCIATION AND ALL
OTHER STATE AGENCIES OWNING LAND WITHIN THE
ADJUDICATION BOUNDARY (hereafter referred to as "State")

5 SET: ONE

6 Pursuant to Code of Civil Procedure section 2030.210, defendant State of California agencies
7 respond to the Special Interrogatories propounded by Rebecca Willis.

8
9 **PRELIMINARY STATEMENT**

10 It should be noted that the responding party has not fully completed its
11 investigation of the facts relating to this case, has not completed its discovery in the action, and
12 has not completed its preparation for trial. All of the answers contained herein are based only
13 upon such information and documents which are presently available and specifically known to
14 the responding party and disclose only those contentions which presently occur to responding
15 party. It is anticipated that further discovery, independent investigation, legal research and
16 analysis will supply additional facts, add meaning to known facts, as well as establish entirely
17 new factual conclusions and legal contentions, all of which may lead to substantial additions,
18 changes in, and variations from the contentions herein set forth. The following interrogatory
19 responses are given without prejudice to the responding party's right to produce evidence of any
20 subsequently discovered fact or facts which the responding party may later discover or recall.
21 The responding party accordingly reserves the right to change any and all answers herein as
22 additional facts are ascertained, analyses made, legal research is completed and contentions are
23 made. The answers herein are made in a good faith effort to supply as much factual information
24 and as much specification of legal contentions as are presently known, but should in no way be to
25 the prejudice of the responding party in relation to further discovery, research or analysis.

26 **GENERAL OBJECTIONS**

27 1. State objects to the interrogatories to the extent they call for the disclosure of
28 information protected by the attorney-client privilege, the attorney work product doctrine, or any
other applicable privilege or provision for confidentiality, including personal information

1 concerning state employees (Government Code §§ 6254, 6254.3).

2 2. State incorporates the foregoing general objections into each and every response
3 to the interrogatories set forth below.

4 **SPECIFIC OBJECTIONS AND RESPONSES TO INTERROGATORIES**

5 Subject to and without waiving the foregoing objections State responds as follows:

6 **SPECIAL INTERROGATORY NO. 1:**

7 Identify each and every parcel of land YOU own that overlies the Basin. Please provide
8 an address, parcel number, and approximate size of the property.

9 **RESPONSE TO SPECIAL INTERROGATORY NO. 1:**

10 See attached chart with identification of state owned properties marked Exhibit 1 and
11 incorporated herein by reference.

12 **SPECIAL INTERROGATORY NO. 2:**

13 State the number and location of each well that you own or control or operate that pumps
14 groundwater from the Basin.

15 **RESPONSE TO SPECIAL INTERROGATORY NO. 2:**

16 See attached chart with identification of state owned properties that have wells marked
17 Exhibit 1 and incorporated herein by reference.

18 **Parks** - Antelope Valley California Poppy Natural Reserve - inactive - well number
19 231397; Antelope Valley Indian Museum State Historic Park - active - well number 7N/9W-32
20 R1.

21 **Caltrans** - well number 33843 to service both Boron Rest Areas. It is located at PM 139
22 on Highway 58 at Township 11-N, Range 8-W at Section 34.

23 **Corrections** - these wells are inactive and have not been operated, 337772, 337774,
24 33777 and 337775.

25 **DWR** - one well at Alamo Power Plant (NE 1/4 of Section 4, T.8N., R17W., SBBM);
26 one well at Oso Pumping Plant (NE 1/4 Section 6, T.8N., R17W., SBBM). DWR's investigation
27 in response to this interrogatory is continuing, and DWR may supplement or amend this response
28 as additional information becomes available.

1 **SPECIAL INTERROGATORY NO. 3:**

2 State by month and year, the quantity of groundwater YOU have pumped from each well
3 that YOU have operated in the Basin during the RELEVANT PERIOD.

4 **RESPONSE TO SPECIAL INTERROGATORY NO. 3:**

5 There has been no groundwater pumping by any of the state agencies, except DWR,
6 Caltrans, and Parks.

7 **Parks** - The information is unattainable for the inactive wells at the Antelope Valley
8 California Poppy Natural Reserve, however, the Antelope Valley Indian Museum State Historic
9 Park has pumped less than 2-3 acre feet per year as follows:

10 2007 - 100,000 gallons (museum temporarily closed to public for renovation)

11 2006 - 420,000 gallons

12 2005 - 800,000 gallons

13 2004 - 600,000 gallons

14 **DWR** - Oso Pumping Plant has one well for industrial and domestic uses. Alamo Power
15 Plant has one well for industrial and domestic uses. Total annual use from both wells is
16 estimated to be approximately 45 acre feet. DWR's investigation in response to this
17 interrogatory is continuing, and DWR may supplement or amend this response as additional
18 information becomes available.

19 **Caltrans** - the well at the Boron Rest Areas does not have a meter. It has been servicing
20 these rest areas since 1969. It is estimated to be pumping less than 25 acre feet per year.

21 **The Department of Corrections** has three wells at the prison facility in Los Angeles
22 County that are not being used because of elevated arsenic levels, but the agency wants to be able
23 to use them in the future. The well numbers are 337772, 337774, 33777 and 337775.

24 **SPECIAL INTERROGATORY NO. 4:**

25 State the depth of each well that YOU have operated in the Basin over the RELEVANT
26 PERIOD.

27 **RESPONSE TO SPECIAL INTERROGATORY NO. 4:**

28 **Parks** - inactive wells at Antelope Valley California Poppy Reserve

State Well Number	Depth	Casing Size/Gage or Wall
8N/14W-31 PI-S	540 feet	6" .188
8N/14W-31 RI-S	154 feet	6"
8N/14W-31 LI-S	Unknown	Unknown Unknown

Parks - active well at Antelope Valley Indian Museum State Historic Park

State Well Number	Depth	Casing Size/Gage or Wall
7N/9W-32 RI	360 feet	Unknown Unknown

Water system - two tanks; Tank one is 3,500 gallon and Tank two is 4,500 gallon for a total of 8,000 gallons. Approximately 1/2" of 2" galvanized pipe from well to tanks. Well has submersible pump (12 gallon per minute to tanks).

DWR - Oso Pumping Plant and Alamo Power Plant wells are 30-40 feet deep. DWR's investigation in response to this interrogatory is continuing, and DWR may supplement or amend this response as additional information becomes available.

Caltrans - the depth of the well at the Boron Rest Area is 490 feet.

Corrections - the depth of each well is 870 ft (no. 337772), 1020 ft (no. 337775) and 1010 feet (no. 337777).

SPECIAL INTERROGATORY NO. 5:

Is 100 percent of your pumping of groundwater from the Basin for overlying use?

RESPONSE TO SPECIAL INTERROGATORY NO. 5:

Yes.

SPECIAL INTERROGATORY NO. 6:

If any portion of your pumping of groundwater from the Basin is not for overlying use, identify the transferee or recipient of the groundwater.

RESPONSE TO SPECIAL INTERROGATORY NO. 6:

Not applicable.

SPECIAL INTERROGATORY NO. 7:

If any portion of your pumping of groundwater from the Basin is not for overlying use, identify the use of the groundwater by the transferee.

1 **RESPONSE TO SPECIAL INTERROGATORY NO. 7:**

2 Not applicable.

3 **SPECIAL INTERROGATORY NO. 8:**

4 If any portion of your pumping of groundwater from the Basin is not for overlying use,
5 state the amount of groundwater pumped for non-overlying use.

6 **RESPONSE TO SPECIAL INTERROGATORY NO. 8:**

7 Not applicable.

8 **SPECIAL INTERROGATORY NO. 9:**

9 State the amount you contend to be the safe yield of the Basin for the years 1990 to the
10 present.

11 **RESPONSE TO SPECIAL INTERROGATORY NO. 9:**

12 The State has made no estimate of safe yield.

13 **SPECIAL INTERROGATORY NO. 10:**

14 State the amount or quantity of groundwater recharge to the Basin that YOU contend has
15 been annually supplied from natural sources for each year from 1990 to date.

16 **RESPONSE TO SPECIAL INTERROGATORY NO. 10:**

17 The State has made no estimate of quantity of natural groundwater recharge.

18 **SPECIAL INTERROGATORY NO. 11:**

19 State the amount of groundwater recharge to the Basin that YOU contend has been
20 annually provided by any return flows from agricultural uses for each year from 1990 to the
21 present.

22 **RESPONSE TO SPECIAL INTERROGATORY NO. 11:**

23 The State has made no estimate of recharge from agricultural uses.

24 **SPECIAL INTERROGATORY NO. 12:**

25 For the years 1990 to the present, do YOU contend there was an overdraft in the Basin?

26 **RESPONSE TO SPECIAL INTERROGATORY NO. 12:**

27 The State objects to this interrogatory on the grounds that the term "overdraft" is
28 undefined and as such is vague, ambiguous, overbroad and technically inappropriate.

1 **SPECIAL INTERROGATORY NO. 13:**

2 For the years 1990 to the present, if YOU contend there was an overdraft in the Basin,
3 state each and every fact in support of your contention.

4 **RESPONSE TO SPECIAL INTERROGATORY NO. 13:**

5 The State objects to this interrogatory on the grounds that the term "overdraft" is
6 undefined and as such is vague, ambiguous, overbroad and technically inappropriate. Without
7 waiving said objection, the State notes that, generally speaking, possible evidence of overdraft in
8 a groundwater basin includes but is not limited to: widespread groundwater level decline;
9 calculated decline in stored groundwater; subsidence. Evidence for long-term groundwater level
10 decline in the Antelope Valley Groundwater Basin is found in Carlson and Phillips (1998) and
11 other studies. Studies investigating subsidence in the Antelope Valley Groundwater Basin
12 include Galloway and others (1998), Ikehara and Phillips (1994), Leighton and Phillips (2003),
13 Lundquist and others (1993) and Sneed and Galloway (2000). These observations and studies
14 indicate conditions of overdraft.

15 **SPECIAL INTERROGATORY NO. 14:**

16 For the years 1990 to the present, please state each year that YOU contend there was an
17 overdraft of the Basin.

18 **RESPONSE TO SPECIAL INTERROGATORY NO. 14:**

19 The State objects to this interrogatory on the grounds that the term "overdraft" is
20 undefined and as such is vague, ambiguous, overbroad and technically inappropriate. Experts
21 will disagree on the definition of the term "overdraft" and the appropriateness of applying the
22 term to an annual assessment for a groundwater basin.

23 **SPECIAL INTERROGATORY NO. 15:**

24 For each and every year since 1990 that you contend there was an overdraft of the Basin,
25 state the amount of overdraft.

26 **RESPONSE TO SPECIAL INTERROGATORY NO. 15:**

27 The State objects to this interrogatory on the grounds that the term "overdraft" is
28 undefined and as such is vague, ambiguous, overbroad and technically inappropriate. Experts

1 will disagree on the definition of the term "overdraft" and the appropriateness of applying the
2 term to an annual assessment for a groundwater basin.

3 **SPECIAL INTERROGATORY NO. 16:**

4 For each and every year that you contend there was an overdraft of the Basin, identify
5 each and every person that you believe pumped groundwater from the Basin in excess of the safe
6 yield of the Basin.

7 **RESPONSE TO SPECIAL INTERROGATORY NO. 16:**

8 The State has made no identification of persons or entities who may have contributed to
9 extraction of groundwater in excess of safe yield value. The State has made no estimate of safe
10 yield for the Antelope Valley Groundwater Basin. At this time, before any final judgment or
11 formal settlement of this litigation, the concept of each individual pumper having a personal safe
12 yield is technically inappropriate and will be subject to debate by experts.

13 **SPECIAL INTERROGATORY NO. 17:**

14 Do YOU contend that the Willis Class does not have any correlative overlying rights to
15 the use of the groundwater in the Basin.

16 **RESPONSE TO SPECIAL INTERROGATORY NO. 17:**

17 The State has no information responsive to this interrogatory, and therefore declines at
18 this time to assert any contention one way or the other.

19 **SPECIAL INTERROGATORY NO. 18:**

20 If YOU contend that the Willis Class does not have any correlative overlying rights to the
21 use of groundwater in the Basin, state each and every fact in support of your contention.

22 **RESPONSE TO SPECIAL INTERROGATORY NO. 18:**

23 The State has no information responsive to this interrogatory.

24 **SPECIAL INTERROGATORY NO. 19:**

25 If YOU contend that all groundwater YOU have pumped from within the Basin has been
26 put to a reasonable and beneficial use, please describe all uses of that groundwater over the
27 RELEVANT PERIOD.

28 **RESPONSE TO SPECIAL INTERROGATORY NO. 19:**

Parks - Public use - operation of the state parks.

DWR - Domestic and industrial water supply.

Corrections - Domestic use for state prison facilities.

Caltrans - Domestic water supply for the Boron Rest Areas.

SPECIAL INTERROGATORY NO. 20:

If YOU extracted more than 25 acre-feet per year of groundwater from the Basin, state whether you have filed a Notice of Extraction as required by California Water Code sections 4999 to 5009 for each year.

RESPONSE TO SPECIAL INTERROGATORY NO. 20:

DWR is the only agency which has pumped more than 25 af/yr, and it has not filed any Notice of Extraction.

SPECIAL INTERROGATORY NO. 21:

If YOU contend that YOU have filed a Notice of Extraction as required by California Water Code sections 4999 to 5009 for each year since 1955 that you have extracted more than 25 acre-feet of groundwater from the Basin, please identify and describe each WRITING that supports that contention.

RESPONSE TO SPECIAL INTERROGATORY NO. 21:

N/A

SPECIAL INTERROGATORY NO. 22:

If YOU contend that YOU have filed a Notice of Extraction as required by California Water Code sections 4999 to 5009 for each year since 1955 that you have extracted more than 25 acre-feet of groundwater from the Basin, please state each and every fact in support of your contention.

RESPONSE TO SPECIAL INTERROGATORY NO. 22:

N/A

SPECIAL INTERROGATORY NO. 23:

Please state the identity of each landowner in the Basin that YOU contend has made an unreasonable use of water from 1990 to present.

RESPONSE TO SPECIAL INTERROGATORY NO. 23:

The State has no information responsive to this interrogatory, and therefore declines to

state any contention one way or the other.

SPECIAL INTERROGATORY NO. 24:

Please state the period of time that YOU contend each such landowner has made an unreasonable use of water.

RESPONSE TO SPECIAL INTERROGATORY NO. 24:

The State has no information responsive to this interrogatory, and therefore declines to state any contention one way or the other.

SPECIAL INTERROGATORY NO. 25:

If YOU contend that any landowner in the Basin has made an unreasonable use of water, please state the annual quantity of such unreasonable use by each landowner.

RESPONSE TO SPECIAL INTERROGATORY NO. 25:

The State has no information responsive to this interrogatory, and therefore declines to state any contention one way or the other.

SPECIAL INTERROGATORY NO. 26:

Identify by name and title each non-expert witness you intend to call at the next phase of the trial.

RESPONSE TO SPECIAL INTERROGATORY NO. 26:

State objects to this interrogatory on the grounds that it calls for the disclosure of information protected by the attorney-client privilege and the attorney work product doctrine.

SPECIAL INTERROGATORY NO. 27:

Identify each and every document you intend to offer or use at the next phase of the trial.

RESPONSE TO SPECIAL INTERROGATORY NO. 27:

State objects to this interrogatory on the grounds that it calls for the disclosure of information protected by the attorney-client privilege and the attorney work product doctrine.

SPECIAL INTERROGATORY NO. 28:

If your use of groundwater is for agricultural purposes, state the nature or type of each crop that you have grown during each year over the relevant period.

RESPONSE TO SPECIAL INTERROGATORY NO. 28:

N/A

SPECIAL INTERROGATORY NO. 29:

If your use of the groundwater is for agricultural purposes, state the amount or quantity of water used for each different type of crop that you have grown for each year over the relevant period.

RESPONSE TO SPECIAL INTERROGATORY NO. 29:

N/A

SPECIAL INTERROGATORY NO. 30:

If your use of the groundwater is for agricultural purposes, state the number of acres you have annually dedicated to each different type of over the relevant period.

RESPONSE TO SPECIAL INTERROGATORY NO. 30:

N/A

SPECIAL INTERROGATORY NO. 31:

Did you transfer or sell any groundwater from the Basin during the relevant period?

RESPONSE TO SPECIAL INTERROGATORY NO. 31:

No.

SPECIAL INTERROGATORY NO. 32:

If you sold or transferred any groundwater from the Basin during the relevant period, state the name of each the transferee and the amount of water transferred to the transferee.

RESPONSE TO SPECIAL INTERROGATORY NO. 32:

N/A

SPECIAL INTERROGATORY NO. 33:

If you sold or transferred any groundwater from the Basin during the relevant period, state the consideration you received from each separate transfer.

RESPONSE TO SPECIAL INTERROGATORY NO. 33:

N/A

SPECIAL INTERROGATORY NO. 34:

State by month and year the amount of State Project water, i.e. imported water, YOU have purchased from the Antelope Valley-East Kern Water Agency over the relevant period.

RESPONSE TO SPECIAL INTERROGATORY NO. 34:

1 Parks - The wells within the Antelope Valley California Poppy Natural Reserve went
2 inactive in late 1990's. Water has been purchased from AVEK; Parks only has partial records
3 2007-2008, 2007-2006. Please see AVEK invoices provided in Response to Request for
4 Production of Documents for amount of water purchased.

5 **SPECIAL INTERROGATORY NO. 35:**

6 State by month and year, the average cost of water YOU have purchased from the
7 Antelope Valley-East Kern Water Agency over the relevant period.

8 **RESPONSE TO SPECIAL INTERROGATORY NO. 35:**

9 **Department of Parks and Recreation:**

10 6/30/06 for \$152.25

11 8/1/06; 9/30/06; 10/31/06; 11/30/06; 12/31/06 at \$101.50 for each date

12 1/31/07; 2/28/07; 3/31/07; 4/30/07; 6/30/07; 7/31/07; 8/31/07; 9/30/07; 10/31/07;

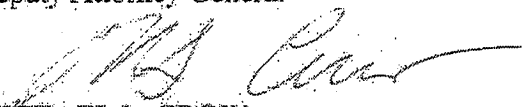
13 11/30/07; 12/31/07 at \$106.00 for each date

14 1/31/08; 2/29/08; 3/31/08; 4/30/08; 5/31/08 - at \$110.50 for each date.

15 Dated: 7-18-08

16 Respectfully submitted,

17
18 EDMUND G. BROWN JR.
19 Attorney General of the State of California
20 DANIEL L. SIEGEL
21 Supervising Deputy Attorney General
22 VIRGINIA A. CAHILL
23 Deputy Attorney General

24 
25 MICHAEL L. CROW
26 Deputy Attorney General

27 Attorneys for State of California, Santa
28 Monica Mountains Conservancy, and State of
California 50th District Agricultural
Association.

EXHIBIT 1

STATE OWNED PROPERTY WELL INFORMATION
ANTELOPE VALLEY ADJUDICATION AREA

AGENCY	DESCRIPTION	APN (or other description)	County	Acres	Wells
State Lands	School lands	261-160-3600 261-160-4400	Kern	13.91	No
State Lands	Schools lands	474-131-0400	Kern	160	No
50 th District Ag. Assn	Antelope Valley Fair 2551 West Avenue H Lancaster, CA 93536	3114-011-094 3114-011-023	L.A.	131.85 3.53	No
DWR	CA Aqueduct, Oso pumping plant	3253-001-902 NE 1/4 of Section 6, Township 8 North, Range 17 West	L.A.	311.6	Yes
DWR	Alamo Power Plant	3253-001-900	L.A.	144.06	Yes
DWR	CA Aqueduct In addition, DWR owns or has interest in lands going under California aqueduct.	3275-001-900	L.A.	139.44	No

AGENCY	DESCRIPTION	APN (or other description)	County	Acres	Wells
State Parks	Antelope Valley California Poppy Natural Reserve 15101 Lancaster Road. Lancaster, CA 93536	3236-014-902	L.A.	38.48	Yes
		3236-014-901		80	
		3236-005-900		160	
		3236-014-900		160	
		3266-001-901		143.4	
		3266-001-902		141.27	
		3266-001-903		141.27	
		3266-001-900		112	
		3236-014-905		394.49	
		3236-014-906			
		3236-014-907		40	
		3236-014-908		160	
		3236-018-903		4.2	
		3236-015-900		10	
		3236-018-905		4.19	
		3236-015-901		4.82	
		3236-018-906		4.95	
		3236-018-907		4.95	
		3236-015-902		9.64	
		3236-018-904		4.95	
		3236-018-909		4.95	
		3236-018-908		9.89	
		3236-015-903		1	
		3236-015-904		6.85	
		3236-015-906			
		3266-001-900		Approx. 1700+ acres	

AGENCY	DESCRIPTION	APN (or other description)	County	Acres	Wells
State Parks	Antelope Valley Indian Museum State Historic Park 15701 East Avenue M Lancaster, CA 93535	3663-004-900 3363-004-901 3363-003-800 (MOU with BLM) 3363-004-002	L.A.	250 + acres	Yes
State Parks	Arthur B. Ripley Desert Woodlands State Park	3238-016-903 383-016-904	L.A.	566+ acres	
State Parks	Saddleback Butte State Park 43230 172 nd Street East Lancaster, CA 93535	3162-001-904 3162-001-900 3162-002-901 3162-003-900 3162-004-900 3162-006-901 3162-006-903	L.A.	2955+ acres	
Caltrans	Little Rock Wash Mitigation Parcels Highway 138 at PM 52.5	3050-009-014 3050-009-021			
Caltrans	Lancaster Maintenance Station 44023 Sierra Highway (Highway 14) Lancaster	3132-140-091	L.A.	1.38	
Caltrans	Boron Rest Stop Highway 58 PM 138.917	232-022-1136 232-022-1137	Kern	52.91 18.64	Yes

AGENCY	DESCRIPTION	APN (or other description)	County	Acres	Wells
Caltrans	Palmdale Park & Ride Ave. S at Geiger Ave. Palmdale		L.A.		
Caltrans	Lancaster Park & Ride 1601 W. Ave. K & SR 14 Lancaster		L.A.		
Caltrans	Rights of Way for Highways available at Caltrans offices for inspection				
AGENCY	DESCRIPTION	APN (or other description)	County	Acres	Wells
Veterans Affairs	Lancaster Veterans Home 45221 30 th Street West Lancaster	3107-012-907	L.A.	22.44	No
Dept. of Military	Lancaster Armory 47002 45 th West Lancaster	3105-001-906	L.A.	28.54	No
Highway Patrol	2041 W. Avenue I Lancaster	3114-013-906	L.A.	1.36	No
Corrections	CSP, LA County	3114-0110-904 3203-014-900	L.A.	261.74	Yes but inactive

AGENCY	DESCRIPTION	APN (or other description)	County	Acres	Wells
Corrections	Fenner Canyon Conservation Valerymo, CA	25900 Big Rock Creek (may not be in adjudication area)	L.A.		Yes
Santa Monica Mountains Conservancy		3059-005-006	L.A.	40.53	
		3059-004-002		80	
		3091-018-900		40	
		3091-018-901		40	
		3236-006-001		40	
		3236-007-001		118.76	

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VERIFICATION

I, RUSS DINGMAN, declare as follows:

I am the Outdoor Recreation Planner for the California Department of Parks and Recreation, an agency of the State of California, one of the parties hereto; I am authorized to make this verification for and on behalf of said entity. I have read the foregoing Responses to Request for Special Interrogatories and know the contents thereof.

The information necessary to prepare the responses of California Department of Parks and Recreation to Plaintiff's Request for Special Interrogatories was obtained from numerous sources within California Department of Parks and Recreation and the response was prepared with the advice and assistance of legal counsel. Accordingly, I rely on these individuals for the accuracy of the information stated in the responses. On that basis, I am informed and believe that the matters stated therein are true, correct and complete.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 8, 2008, in Lancaster, California.

By: Russ Dingham
RUSS DINGMAN

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VERIFICATION

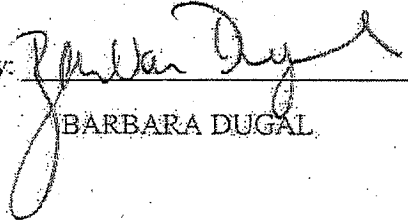
I, BARBARA DUGAL, declare as follows:

I am Chief of the Land Management Division of the State Lands Commission, an agency of the State of California, one of the parties hereto; I am authorized to make this verification for and on behalf of said entity. I have read the foregoing Responses to Special Interrogatories and know the contents thereof.

The information necessary to prepare the responses of State Lands Commission to Plaintiff's Request for Special Interrogatories was obtained from numerous sources within the State Lands Commission and the response was prepared with the advice and assistance of legal counsel. Accordingly, I rely on these individuals for the accuracy of the information stated in the responses. On that basis, I am informed and believe that the matters stated therein are true, correct and complete.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 11, 2008, in Sacramento, California.

By: 

BARBARA DUGAL

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VERIFICATION

I, THOMAS P. HALLENBECK, declare as follows:

I am the Director for Caltrans District 9, an agency of the State of California, one of the parties hereto. I am authorized to make this verification for and on behalf of said entity. I have read the foregoing Responses to Request for Special Interrogatories and know the contents thereof. This verification is limited to the information supplied pertaining to the well at the Boron Rest areas.

The information necessary to prepare the responses of Caltrans to Plaintiff's Request for Special Interrogatories was obtained from numerous sources within Caltrans and the response was prepared with the advice and assistance of legal counsel. Accordingly, I rely on these individuals for the accuracy of the information stated in the responses. On that basis, I am informed and believe that the matters stated therein are true, correct and complete.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 7, 2008, in Bishop, California.

By: Thomas P. Hallenbeck

THOMAS P. HALLENBECK

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VERIFICATION

I, WILLIAM H. REAGAN, declare as follows:

I am the Deputy Director for Design, District 7, at Caltrans, an agency of the State of California, one of the parties hereto; I am authorized to make this verification for and on behalf of said entity. I have read the foregoing Responses to Request for Special Interrogatories and know the contents thereof. This verification is limited to information supplied pertaining to the park and ride lots in Lancaster and Palmdale, the Little Rock Wash Mitigation parcels and the Lancaster Maintenance Station.

The information necessary to prepare the responses of Caltrans to Plaintiff's Request for Special Interrogatories was obtained from numerous sources within Caltrans and the response was prepared with the advice and assistance of legal counsel. Accordingly, I rely on these individuals for the accuracy of the information stated in the responses. On that basis, I am informed and believe that the matters stated therein are true, correct and complete.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on JULY 14th, 2008, in LOS ANGELES, California.

By: William H. Reagan

WILLIAM H. REAGAN

1 VERIFICATION

2
3 I, RORIE SKEI, declare as follows:

4 I am the Chief Deputy Director for Santa Monica Mountains Conservancy, an agency of
5 the State of California, one of the parties hereto; I am authorized to make this verification for and
6 on behalf of said entity. I have read the foregoing Responses to Request for Special
7 Interrogatories and know the contents thereof.

8 The information necessary to prepare the responses of Santa Monica Mountains
9 Conservancy to Plaintiff's Request for Special Interrogatories was obtained from numerous
10 sources within Santa Monica Mountains Conservancy and the response was prepared with the
11 advice and assistance of legal counsel. Accordingly, I rely on these individuals for the accuracy
12 of the information stated in the responses. On that basis, I am informed and believe that the
13 matters stated therein are true, correct and complete.

14 I declare under penalty of perjury that the foregoing is true and correct.

15 Executed on July 8, 2008, in Malibu, California.

16
17 By: 
18 RORIE SKEI

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VERIFICATION

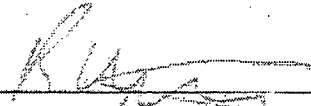
I, RICHARD WYATT, declare as follows:

I am the Dept. Construction and Maintenance Supervisor for the California Department of Veterans Affairs, an agency of the State of California, one of the parties hereto; I am authorized to make this verification for and on behalf of said entity. I have read the foregoing Responses to Request for Special Interrogatories and know the contents thereof.

The information necessary to prepare the responses of California Department of Veterans Affairs to Plaintiff's Request for Special Interrogatories was obtained from numerous sources within California Department of Veterans Affairs and the response was prepared with the advice and assistance of legal counsel. Accordingly, I rely on these individuals for the accuracy of the information stated in the responses. On that basis, I am informed and believe that the matters stated therein are true, correct and complete.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 7-8-08, 2008, in Sacramento, California.

By: 

RICHARD WYATT

1 VERIFICATION

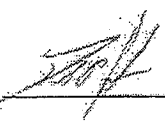
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3 I, DAN JACOBS, declare as follows:

4 I am Chief Executive Officer of the Fiftieth (50th) District Agricultural Association, an
5 agency of the State of California, one of the parties hereto. I am authorized to make this
6 verification for and on behalf of said entity. I have read the foregoing Responses to Request for
7 Special Interrogatories and know the contents thereof.

8 The information necessary to prepare the responses of Fiftieth (50th) District Agricultural
9 Association to Plaintiff's Request for Special Interrogatories was obtained from numerous
10 sources within the Fiftieth (50th) District Agricultural Association and the response was prepared
11 with the advice and assistance of legal counsel. Accordingly, I rely on these individuals for the
12 accuracy of the information stated in the responses. On that basis, I am informed and believe
13 that the matters stated therein are true, correct and complete.

14 I declare under penalty of perjury that the foregoing is true and correct.

15 Executed on June 8, 2008, in Lancaster, California.

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17 By: 

18 DAN JACOBS
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VERIFICATION

I, LT. ANDRIA D. WITMER, declare as follows:

I am the Lieutenant of the California Highway Patrol Antelope Valley area office for the California Department of Highway Patrol, an agency of the State of California, one of the parties hereto; I am authorized to make this verification for and on behalf of said entity. I have read the foregoing Responses to Request for Special Interrogatories and know the contents thereof.

The information necessary to prepare the responses of California Department of Highway Patrol to Plaintiff's Request for Special Interrogatories was obtained from numerous sources within California Department of Highway Patrol and the response was prepared with the advice and assistance of legal counsel. Accordingly, I rely on these individuals for the accuracy of the information stated in the responses. On that basis, I am informed and believe that the matters stated therein are true, correct and complete.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 9, 2008, in LANCASTER, California.

By, Andria Witmer

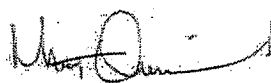
LT. ANDRIA D. WITMER

VERIFICATION

I, MARK QUIMET, am the Chief of the Real Estate Branch for the California Military Department. I have reviewed the foregoing *Responses to Plaintiff's Special Interrogatories, Set One*. The responses are true to the best of my knowledge, except where stated, on information and belief and as to such matters I believe them to be true.

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

Executed on 15 July, 2008, at Joint Forces Headquarters, Sacramento, California.



MARK QUIMET
CPT, USAR (Retired)
Chief, Real Estate Branch

1 VERIFICATION

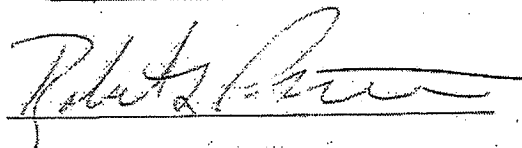
2
3 I, ROBERT L. PIEROTTI, declare as follows:

4 I am Chief of the Resources Assessment Branch of the Southern District of the
5 Department of Water Resources, an agency of the State of California, one of the parties hereto; I
6 am authorized to make this verification for and on behalf of said entity. I have read the foregoing
7 Responses to Request for Special Interrogatories and know the contents thereof.

8 The information necessary to prepare the responses of Department of Water Resources to
9 Plaintiff's Request for Special Interrogatories was obtained from numerous sources within the
10 Department of Water Resources and the response was prepared with the advice and assistance of
11 legal counsel. Accordingly, I rely on these individuals for the accuracy of the information stated
12 in the responses. On that basis, I am informed and believe that the matters stated therein are
13 true, correct and complete.

14 I declare under penalty of perjury that the foregoing is true and correct.

15 Executed on July 16, 2008, in Colton Lake, California.

16
17 By: 

18 ROBERT L. PIEROTTI
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1 EDMUND G. BROWN JR.
Attorney General of the State of California
2 DANIEL L. SIEGEL
Supervising Deputy Attorney General
3 MICHAEL CROW, State Bar No. 70498
Deputy Attorney General
4 VIRGINIA CAHILL, State Bar No. 99167
Deputy Attorney General
5 1300 I Street
P.O. Box 944255
6 Sacramento, CA 94244-2550
Telephone: (916) 322-5647
7 Fax: (916) 327-2319
Attorneys for State of California, Santa Monica
8 Mountains Conservancy, and State of California 50th
District and Agricultural Association

9
10 SUPERIOR COURT OF CALIFORNIA

11 COUNTY OF LOS ANGELES

12 Coordination Proceeding
Special Title (Rule 1550(b))

Judicial Council Coordination
Proceeding No. 4408

13 ANTELOPE VALLEY GROUNDWATER
CASES

Assigned to The Honorable
Jack Komar

14 Included Actions:

15 Los Angeles County Waterworks District No. 40 v.
Diamond Farming Co.
16 Superior Court of California County of Los Angeles,
Case No. BC 325 201

DEFENDANT, STATE OF
CALIFORNIA'S RESPONSE TO
REBECCA WILLIS' FORM
INTERROGATORIES

17 Los Angeles County Waterworks District No. 40 v.
18 Diamond Farming Co.
Superior Court of California, County of Kern,
19 Case No. S-1500-CV-254-348

20 Wm. Bolthouse Farms, Inc. v. City of Lancaster
Diamond Farming Co. v. City of Lancaster
21 Diamond Farming Co. v. Palmdale Water Dist.
Superior Court of California, County of Riverside,
22 consolidated Actions, Case Nos. RIC 353 840, RIC 344
436, RIC 344 668

23
24 AND RELATED ACTIONS.

25
26 PROPOUNDING PARTY: REBECCA WILLIS

27 RESPONDING PARTY: STATE OF CALIFORNIA, ON BEHALF OF SANTA MONICA
MOUNTAINS CONSERVANCY, STATE OF CALIFORNIA 50TH
28 DISTRICT AGRICULTURAL ASSOCIATION, AND ALL OTHER

STATE AGENCIES OWNING LAND WITHIN THE
ADJUDICATION BOUNDARY (hereafter referred to as "State")

SET: ONE

Pursuant to Code of Civil Procedure section 2030.210 et seq. and 2033.710 et seq., defendant State of California agencies respond to the Form Interrogatories propounded by Rebecca Willis.

PRELIMINARY STATEMENT

It should be noted that the responding party has not fully completed its investigation of the facts relating to this case, has not completed its discovery in the action, and has not completed its preparation for trial. All of the answers contained herein are based only upon such information and documents which are presently available and specifically known to the responding party and disclose only those contentions which presently occur to responding party. It is anticipated that further discovery, independent investigation, legal research and analysis will supply additional facts, add meaning to known facts, as well as establish entirely new factual conclusions and legal contentions, all of which may lead to substantial additions, changes in, and variations from the contentions herein set forth. The following interrogatory responses are given without prejudice to the responding party's right to produce evidence of any subsequently discovered fact or facts which the responding party may later discover or recall. The responding party accordingly reserves the right to change any and all answers herein as additional facts are ascertained, analyses made, legal research is completed and contentions are made. The answers herein are made in a good faith effort to supply as much factual information and as much specification of legal contentions as are presently known, but should in no way be to the prejudice of the responding party in relation to further discovery, research or analysis.

GENERAL OBJECTIONS

1. State generally objects to these form interrogatories on the grounds that they are not authorized under Code of Civil Procedure section 2033.710 et seq. for this particular action. Section 2033.710 authorizes the use of form interrogatories as follows: "The Judicial Council shall develop and approve official form interrogatories and requests for admission of the

1 genuineness of any relevant documents or of the truth of any relevant matters of fact for use in
2 any civil action in a state court based on personal injury, property damage, wrongful death,
3 unlawful detainer, breach of contract, family law, or fraud and for any other civil actions the
4 Judicial Council deems appropriate." This adjudication of groundwater rights does not fall
5 within any of the specific categories listed in section 2033.710, and the Judicial Council has not
6 promulgated any rules, regulations or policies which would authorize form interrogatories in this
7 particular case.

8 2. State objects to the term "incident" as defined in section 4 of the form
9 interrogatories, as being undefined, overbroad, vague, ambiguous, and technically inappropriate.
10 The terms "characteristics of the basin/aquifer," "safe yield," and "overdraft" are subject to
11 differing definitions and opinions as to their meaning.

12 3. State objects to the interrogatories to the extent they call for the disclosure of
13 information protected by the attorney-client privilege, the attorney work product doctrine, or any
14 other applicable privilege or provision for confidentiality, including personal information
15 concerning state employees (Government Code §§ 6254, 6254.3).

16 4. State objects generally to section 2 in its entirety. Section 2 of the form is
17 designed to obtain information regarding an individual defendant. State cannot comprehensibly
18 answer these interrogatories, as they are not written to discover useful information from a public
19 entity. In this case, the interrogatories are irrelevant, burdensome, and are not intended to
20 discover information that is pertinent to the facts or issues before the court. In addition, the State
21 objects to Section 2 insofar as it calls for personal information about state employees, on the
22 grounds that said personal information, in addition to being irrelevant to the facts and issues in
23 this case, is protected from disclosure by Government Code section 6254(c), and the disclosure
24 of said information would constitute an unwarranted invasion of privacy.

25 5. State incorporates the foregoing general objections into each and every
26 response to the interrogatories set forth below.

27 **RESPONSES TO FORM INTERROGATORIES**

28 Subject to and without waiving the foregoing objections State responds as follows:

1 **FORM INTERROGATORY NO. 1:**

2 State the name, ADDRESS, telephone number, and relationship to you of each PERSON
3 who prepared or assisted in the preparation of the responses to these
4 interrogatories. *(Do not identify anyone who simply typed or reproduced the responses.)*

5 **RESPONSE TO FORM INTERROGATORY NO. 1:**

6 1. **California Attorney General:** 1300 J Street, Sacramento CA 95814.

7 Michael L. Crow, Deputy Attorney General (916) 422-3077; Virginia A. Cahill, Deputy Attorney
8 General (916) 322-5647; Keri Spaulding, Senior Legal Analyst (916) 327-6761.

9 2. **State Land Commission:** Barbara Dugal, Chief, Land Management Division,
10 100 Howe Ave., Suite 100 South, Sacramento, CA 95825; (916) 574-1900; Jim Frey, Senior
11 Staff Counsel, 100 Howe Ave., Suite 100 South, Sacramento, CA 95825; (916) 574-1829.

12 3. **Department of Water Resources:** Robert Pierotti, Chief, Resource Assessment
13 Branch, Southern District, 770 Fairmont Avenue, Glendale CA 91203 (818) 500-1645; Timothy
14 M. Ross, Ph.D., Chief, Groundwater Section, 770 Fairmont Avenue, Glendale CA 91203 (818)
15 500-1645; Andrew Pollak, Senior Staff Counsel, 1416 Ninth Street, Sacramento CA 95814,
16 (916) 653-5133.

17 4. **Department of Parks and Recreation:** Warren Arthur Dingman, Outdoor
18 Recreation Planner, Tehachapi District, 43779 15th Street W, Lancaster CA 93534 (661) 942-
19 0662.

20 5. **Department of Transportation (Caltrans):** Donna Clark, Staff Counsel, 1120
21 N Street, Sacramento CA 95814 (916) 654-2630; Thomas P. Hallenbeck, Caltrans District 9
22 Director, 500 South Main, Bishop, CA, 93514, (760) 872-0602; William H. Reagan, Caltrans
23 District 7 Deputy Director, 100 S. Main, Los Angeles, CA, 90012, (213) 897-0362.

24 6. **50th District Agricultural Association:** Dan Jacobs, CEO, 2551 West Avenue H,
25 Lancaster CA 93536 (661) 948-6060.

26 7. **California Highway Patrol:** Jonathan Rothman, General Counsel, 2555 First
27 Avenue, Sacramento CA 94298 (916) 657-7261; Lt. Andria D. Witmer, 2041 West Avenue I,
28 Lancaster, CA, 93536, (661) 948-8541.

1 8. **Department of Veterans Affairs:** Denise Lewis, Staff Counsel, 1227 O Street,
2 Suite 306, Sacramento, CA 94295-0001, (916) 653-1941; Richard Wyatt, Maintenance
3 Supervisor, 1227 O Street, Suite 306, Sacramento, CA, 95814.

4 9. **Department of Military:** Maj. JA, CA ARNG, Andreas O. Garza, Office of the
5 Judge Advocate, 9800 Goethe Road, Sacramento, CA 95826 (916) 854-3505; CPT, USAR
6 (Retired) Mark Ouimet, Chief, Real Estate Branch, 9800 Goethe Road, Sacramento, CA, 95826,
7 (916) 854-3505.

8 10. **Santa Monica Mountains Conservancy:** Laurie Collins, Senior Staff Counsel,
9 570 West Avenue 26th, Los Angeles, CA, 90065, (323) 221-8900; Rorie Skei, Chief Deputy
10 Director,
11 5750 Ramirez Canyon Road, Malibu, CA, 90065; (310) 589-3200.

12 11. **Department of Corrections:** Dan Robbins, California State Prison Los Angeles
13 County, 44750 60th Street West, Lancaster, CA 93531, (661) 729-2000.

14 **FORM INTERROGATORY NO. 2.1:**

15 State: (a) your name;
16 (b) every name you *have* used in the past; and
17 (c) the dates you used each name.

18 **RESPONSE TO FORM INTERROGATORY NO. 2.1:**

19 State objects on the grounds that the interrogatory calls for information regarding an
20 individual defendant. State cannot comprehensibly answer this interrogatory, as it is not written
21 to discover useful information from a public entity. In this case, the interrogatory is irrelevant,
22 burdensome, and is not intended to discover information that is relevant to the facts or issues
23 before the court. In addition, the interrogatory calls for personal information the disclosure of
24 which would constitute an unwarranted invasion of privacy.

25 **FORM INTERROGATORY NO. 2.2:**

26 State the date and place of your birth.

27 **RESPONSE TO FORM INTERROGATORY NO. 2.2:**

28 State objects on the grounds that the interrogatory calls for information regarding an

1 individual defendant. State cannot comprehensibly answer this interrogatory, as it is not written
2 to discover useful information from a public entity. In this case, the interrogatory is irrelevant,
3 burdensome, and is not intended to discover information that is pertinent to the facts or issues
4 before the court. In addition, the interrogatory calls for information the disclosure of which
5 would constitute an unwarranted invasion of privacy.

6 **FORM INTERROGATORY NO. 2.3:**

7 At the time of the INCIDENT, did you have a driver's license? If so, state:

- 8 (a) the state or other issuing entity;
9 (b) the license number and type;
10 (c) the date of issuance; and
11 (d) all restrictions.

12 **RESPONSE TO FORM INTERROGATORY NO. 2.2:**

13 State objects on the grounds that the interrogatory calls for information regarding an
14 individual defendant. State cannot comprehensibly answer this interrogatory, as it is not written
15 to discover useful information from a public entity. In this case, the interrogatory is irrelevant,
16 burdensome, and is not intended to discover information that is pertinent to the facts or issues
17 before the court. In addition, the interrogatory calls for information the disclosure of which
18 would constitute an unwarranted invasion of privacy.

19 **FORM INTERROGATORY NO. 2.4:**

20 At the time of the INCIDENT, did you have any other permit or license for the operation
21 of a motor vehicle? If so, state:

- 22 (a) the state or other issuing entity;
23 (b) the license number and type;
24 (c) the date of issuance; and
25 (d) all restrictions.

26 **RESPONSE TO FORM INTERROGATORY NO. 2.4:**

27 State objects on the grounds that the interrogatory calls for information regarding an
28

1 individual defendant. State cannot comprehensibly answer this interrogatory, as it is not written
2 to discover useful information from a public entity. In this case, the interrogatory is irrelevant,
3 burdensome, and is not intended to discover information that is pertinent to the facts or issues
4 before the court. In addition, the interrogatory calls for information the disclosure of which
5 would constitute an unwarranted invasion of privacy.

6 **FORM INTERROGATORY NO. 2.5:**

7 State:

8 (a) your present residence ADDRESS;

9 (b) your residence ADDRESSES for the past five years; and

10 (c) the dates you lived at each ADDRESS.

11 **RESPONSE TO FORM INTERROGATORY NO. 2.5:**

12 State objects on the grounds that the interrogatory calls for information regarding an individual
13 defendant. State cannot comprehensibly answer this interrogatory, as it is not written to discover
14 useful information from a public entity. In this case, the interrogatory is irrelevant, burdensome,
15 and is not intended to discover information that is pertinent to the facts or issues before the court.
16 In addition, the interrogatory calls for information the disclosure of which would constitute an
17 unwarranted invasion of privacy.

18 **FORM INTERROGATORY NO. 2.6:**

19 State:

20 (a) the name, ADDRESS, and telephone number of your present employer or place of
21 self-employment; and

22 (b) the name, ADDRESS, dates of employment, job title, and nature of work for each
23 employer or self-employment you have had from five years before the INCIDENT until today.

24 **RESPONSE TO FORM INTERROGATORY NO. 2.6:**

25 State objects on the grounds that the interrogatory calls for information regarding an
26 individual defendant. State cannot comprehensibly answer this interrogatory, as it is not written
27 to discover useful information from a public entity. In this case, the interrogatory is irrelevant,
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1 burdensome, and is not intended to discover information that is pertinent to the facts or issues
2 before the court. In addition, the interrogatory calls for information the disclosure of which
3 would constitute an unwarranted invasion of privacy.

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5 **FORM INTERROGATORY NO. 2.7:**

6 State:

7 (a) the name and ADDRESS of each school or other academic or vocational institution
8 you have attended, beginning with high school;

9 (b) the dates you attended;

10 (c) the highest grade level you have completed; and

11 (d) the degrees received.

12 **RESPONSE TO FORM INTERROGATORY NO. 2.7:**

13 State objects on the grounds that the interrogatory calls for information regarding an
14 individual defendant. State cannot comprehensibly answer this interrogatory, as it is not written
15 to discover useful information from a public entity. In this case, the interrogatory is irrelevant,
16 burdensome, and is not intended to discover information that is pertinent to the facts or issues
17 before the court. In addition, the interrogatory calls for information the disclosure of which
18 would constitute an unwarranted invasion of privacy.

19
20 **FORM INTERROGATORY NO. 2.8:**

21 Have you ever been convicted of a felony? If so, for each conviction state:

22 (a) the city and state where you were convicted,

23 (b) the date of conviction;

24 (c) the offense; and

25 (d) the court and case number.

26 **RESPONSE TO FORM INTERROGATORY NO. 2.8:**

27 State objects on the grounds that the interrogatory calls for information regarding an
28 individual defendant. State cannot comprehensibly answer this interrogatory, as it is not written

1 to discover useful information from a public entity. In this case, the interrogatory is irrelevant,
2 burdensome, and is not intended to discover information that is pertinent to the facts or issues
3 before the court. In addition, the interrogatory calls for information the disclosure of which
4 would constitute an unwarranted invasion of privacy.

5 **FORM INTERROGATORY NO. 2.9:**

6 Can you speak English with ease? If not, what language and dialect do you normally use?

7 **RESPONSE TO FORM INTERROGATORY NO. 2.9:**

8 State objects on the grounds that the interrogatory calls for information regarding an
9 individual defendant. State cannot comprehensibly answer this interrogatory, as it is not written
10 to discover useful information from a public entity. In this case, the interrogatory is irrelevant,
11 burdensome, and is not intended to discover information that is pertinent to the facts or issues
12 before the court. In addition, the interrogatory calls for information the disclosure of which
13 would constitute an unwarranted invasion of privacy.

14 **FORM INTERROGATORY NO. 2.10:**

15 Can you read and write English with ease? If not, what language and dialect do you
16 normally use?

17 **RESPONSE TO FORM INTERROGATORY NO. 2.10:**

18 State objects on the grounds that the interrogatory calls for information regarding an
19 individual defendant. State cannot comprehensibly answer this interrogatory, as it is not written
20 to discover useful information from a public entity. In this case, the interrogatory is irrelevant,
21 burdensome, and is not intended to discover information that is pertinent to the facts or issues
22 before the court. In addition, the interrogatory calls for information the disclosure of which
23 would constitute an unwarranted invasion of privacy.

24 **FORM INTERROGATORY NO. 2.11:**

25 At the time of the INCIDENT were you acting as an agent or employee for any
26 PERSON? If so, state:

27 (a) the name, ADDRESS, and telephone number of that PERSON; and
28

1 (b) a description of your duties.

2 **RESPONSE TO FORM INTERROGATORY NO. 2.11:**

3 State objects on the grounds that the interrogatory calls for information regarding an
4 individual defendant. State cannot comprehensibly answer this interrogatory, as it is not written
5 to discover useful information from a public entity. In this case, the interrogatory is irrelevant,
6 burdensome, and is not intended to discover information that is pertinent to the facts or issues
7 before the court. In addition, the interrogatory calls for information the disclosure of which
8 would constitute an unwarranted invasion of privacy.

9 **FORM INTERROGATORY NO. 2.12:**

10 At the time of the INCIDENT did you or any other person have any physical, emotional,
11 or mental disability or condition that *may* have contributed to the occurrence of the INCIDENT?

12 If so, for each person state:

13 (a) the name, ADDRESS, and telephone number;

14 (b) the nature of the disability or condition; and

15 (c) the manner in which the disability or condition contributed to the occurrence of the
16 INCIDENT.

17 **RESPONSE TO FORM INTERROGATORY NO. 2.12:**

18 State objects on the grounds that the interrogatory calls for information regarding an
19 individual defendant. State cannot comprehensibly answer this interrogatory, as it is not written
20 to discover useful information from a public entity. In this case, the interrogatory is irrelevant,
21 burdensome, and is not intended to discover information that is pertinent to the facts or issues
22 before the court. In addition, the interrogatory calls for information the disclosure of which
23 would constitute an unwarranted invasion of privacy.

24 **FORM INTERROGATORY NO. 2.13:**

25 Within 24 hours before the INCIDENT did you or any person involved in the INCIDENT
26 use or take any of the following substances: alcoholic beverage, marijuana, or other drug or
27 medication of any kind (prescription or not)? If so, for each person state:
28

- 1 (a) the name, ADDRESS, and telephone number;
- 2 (b) the nature or description of each substance;
- 3 (c) the quantity of each substance used or taken;
- 4 (d) the date and time of *day* when each substance was used or taken;
- 5 (e) the ADDRESS where each substance was used or taken;
- 6 (f) the name, ADDRESS, and telephone number of each person who was present when
- 7 each substance was used or taken; and
- 8 (g) the name, ADDRESS, and telephone number of any HEALTH CARE PROVIDER
- 9 who prescribed or furnished the substance and the condition for which it was prescribed or
- 10 furnished.

11 **RESPONSE TO FORM INTERROGATORY NO. 2.13:**

12 State objects on the grounds that the interrogatory calls for information regarding an

13 individual defendant. State cannot comprehensibly answer this interrogatory, as it is not written

14 to discover useful information from a public entity. In this case, the interrogatory is irrelevant,

15 burdensome, and is not intended to discover information that is pertinent to the facts or issues

16 before the court. In addition, the interrogatory calls for personal information the disclosure of

17 which would constitute an unwarranted invasion of privacy.

18 **FORM INTERROGATORY NO. 3.1:**

19 Are you a corporation? If so, state:

20 (a) the name stated in the current articles of incorporation;

21 (b) all other names used by the corporation during the past 10 years and the dates each

22 was used;

23 (c) the date and place of incorporation;

24 (d) the ADDRESS of the principal place of business; and

25 (e) whether you are qualified to do business in California.

26 **RESPONSE TO FORM INTERROGATORY NO. 3.1:**

27 No.

1 **FORM INTERROGATORY NO. 3.2:**

2 Are you a partnership? If so, state:

3 (a) the current partnership name;

4 (b) all other names used by the partnership during the past 10 years and the dates each
5 was used;

6 (c) whether you are a limited partnership and, if so, under the laws of what jurisdiction;

7 (d) the name and ADDRESS of each general partner; and

8 (e) the ADDRESS of the principal place of business.

9 **RESPONSE TO FORM INTERROGATORY NO. 3.2:**

10 No.

11 **FORM INTERROGATORY NO. 3.3:**

12 Are you a limited liability company? If so, state:

13 (a) the name stated in the current articles of organization;

14 (b) all other names used by the company during the past 10 years and the date each was
15 used;

16 (c) the date and place of filing of the articles of organization;

17 (d) the ADDRESS of the principal place of business; and

18 (e) Whether you are qualified to do business in California.

19 **RESPONSE TO FORM INTERROGATORY NO. 3.3:**

20 No.

21 **FORM INTERROGATORY NO. 3.4:**

22 Are you a joint venture? If so, state:

23 (a) the current joint venture name;

24 (b) all other names used by the joint venture during the past 10 years and the dates each
25 was used;

26 (c) the name and ADDRESS of each joint venturer; and

27 (d) the ADDRESS of the principal place of business.

RESPONSE TO FORM INTERROGATORY NO. 3.4:

No.

FORM INTERROGATORY NO. 3.5:

Are you an unincorporated association? If so, state:

(a) the current unincorporated association name:

(b) all other names used by the unincorporated association during the past 10 years and the dates each was used; and

(c) the ADDRESS of the principal place of business.

RESPONSE TO FORM INTERROGATORY NO. 3.5:

No.

FORM INTERROGATORY NO. 3.6:

Have you done business under a fictitious name during the past 10 years? If so, for each fictitious name state:

(a) the name;

(b) the dates each was used;

(c) the state and county of each fictitious name filing; and

(d) the ADDRESS of the principal place of business.

RESPONSE TO FORM INTERROGATORY NO. 3.6:

No.

FORM INTERROGATORY NO. 3.7:

Within the past five years has any public entity registered or licensed your business? If so, for each license or registration:

(a) identify the license or registration;

(b) state the name of the public entity; and

(c) state the dates of issuance and expiration.

RESPONSE TO FORM INTERROGATORY NO. 3.7:

No.

FORM INTERROGATORY NO. 12.1:

State the name, ADDRESS, and telephone number of each individual:

(a) who witnessed the INCIDENT or the events occurring immediately before or after the INCIDENT;

(b) who made any statement at the scene of the INCIDENT;

(c) who heard any statements made about the INCIDENT by any individual at the scene; and

(d) who YOU OR ANYONE ACTING ON YOUR BEHALF claim has knowledge of the INCIDENT (except for expert witnesses covered by Code of Civil Procedure section 2034).

RESPONSE TO FORM INTERROGATORY NO. 12.1:

State objects to this interrogatory to the extent it calls for the disclosure of information protected by the attorney-client privilege or the attorney work product doctrine. Without waiving said objection, the names of individuals responsive to this interrogatory are listed in response to number 1.

FORM INTERROGATORY NO. 12.2:

Have YOU OR ANYONE ACTING ON YOUR BEHALF interviewed any individual concerning the INCIDENT? If so, for each individual state:

(a) the name, ADDRESS, and telephone number of the individual interviewed;

(b) the date of the interview; and

(c) the name, ADDRESS, and telephone number of the PERSON who conducted the interview.

RESPONSE TO FORM INTERROGATORY NO. 12.2:

No.

FORM INTERROGATORY NO. 12.3:

Have YOU OR ANYONE ACTING ON YOUR BEHALF obtained a written or recorded statement from any individual concerning the INCIDENT? If so, for each statement state:

(a) the name, ADDRESS, and telephone number of the individual from whom the statement was obtained;

(b) the name, ADDRESS, and telephone number of the individual who obtained the

statement;

(c) the date the statement was obtained; and

(d) the name, ADDRESS, and telephone number of each PERSON who has the original statement or a copy.

RESPONSE TO FORM INTERROGATORY NO. 12.3:

No.

FORM INTERROGATORY NO. 12.4:

Do YOU OR ANYONE ACTING ON YOUR BEHALF know of any photographs, films, or videotapes depicting any place, object or individual concerning the INCIDENT or plaintiff's injuries? If so, state:

(a) the number of photographs or feet of film or videotape;

(b) the places, objects, or persons photographed, filmed, or videotaped;

(c) the date the photographs, films, or videotapes were taken;

(d) the name, ADDRESS, and telephone number of the individual taking the photographs, films, or videotapes; and

(e) the name, ADDRESS, and telephone number of each PERSON who has the original or a copy of the photographs, films, or videotapes.

RESPONSE TO FORM INTERROGATORY NO. 12.4:

No.

FORM INTERROGATORY NO. 12.5:

Do YOU OR ANYONE ACTING ON YOUR BEHALF know of any diagram, reproduction, or model of any place or thing (except for items developed by expert witnesses covered by Code of Civil Procedure sections 2034.21-2034.310) concerning the INCIDENT? If so, for each item

state:

(a) the type (i.e., diagram, reproduction, or model);

(b) the Subject matter; and

(c) the name, ADDRESS, and telephone number of each PERSON who has it

RESPONSE TO FORM INTERROGATORY NO. 12.5:

Documents responsive to this request are listed in response to Request for Production of Documents.

FORM INTERROGATORY NO. 12.6:

Was a report made by any PERSON concerning the INCIDENT? If so, state:

(a) the name, title, identification number, and employer of the PERSON who made the report;

(b) the date and type of report made;

(c) the name, ADDRESS, and telephone number of the PERSON for whom the report was made; and

(d) the name, ADDRESS, and telephone number of each PERSON who has the original or a copy of the report.

RESPONSE TO FORM INTERROGATORY NO. 12.6:

DWR Staff publishes the following reports: *California's Groundwater*, Bulletin 118 (2003 Update); *Groundwater Basins in California*, Bulletin 118 (1980); *California's Groundwater*, Bulletin 118 (1975). Names, addresses, etc. of DWR staff currently responsible for this report are listed in response to number 1, above. Reports and other documents which DWR staff consults in preparing Bulletin 118 are listed in the State's Response to Request for Production of Documents.

FORM INTERROGATORY NO. 12.7:

Have YOU OR ANYONE ACTING ON YOUR BEHALF inspected the scene of the INCIDENT? If so, for each inspection state:

(a) the name, ADDRESS, and telephone number of the individual making the inspection (except for expert witnesses covered by Code of Civil Procedure sections 2034.210-2034.310); and

(b) the date of the inspection.

RESPONSE TO FORM INTERROGATORY NO. 12.7:

DWR staff periodically conducts field inspections of the Antelope Valley in connection with their statutory groundwater basin monitoring responsibilities. The State is unable to supply dates of inspection at this time, but is presently reviewing its records to attempt to obtain said dates.

RESPONSE TO FORM INTERROGATORY NO. 17.1:

(a) Request for Admissions and responses nos. 1, 2, 3, 4, 5, 6, 9, 10, 11, 12, 13.

(b) See response to each request.

(c) Names, addresses, etc. of said persons are listed in response to no. 1, above.

(d) Documents are identified in Response to Request for Production of Documents.

(a) Request for Admission and response no. 7.

(b) The following state agencies have not pumped groundwater: State Lands

Commission, Santa Monica Mountains Conservancy, 50th District Agricultural Association,

Department of Veterans' Affairs, Department of the Military, California Highway Patrol,

Department of Corrections. The Department of Parks and Recreation lacks specific records as

to whether it has pumped groundwater each year since 1990. The agency has pumped

groundwater some years since 1990.

(c) Names, addresses, etc. of said persons are listed in response to no. 1, above.

(d) Documents are identified in Response to Request for Production of Documents.

(a) Request for Admission and response no. 8.

(b) See State's Response to Special Interrogatory Number 14.

(c) Names, addresses, etc. of said persons are listed in response to no. 1, above.

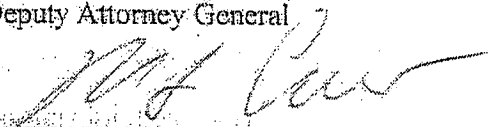
(d) Documents are identified in Response to Request for Production of Documents.

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5 Dated:

7-18-08

6 Respectfully submitted,

7
8 EDMUND G. BROWN JR.
Attorney General of the State of California
9 DANIEL L. SIEGEL
Supervising Deputy Attorney General
10 VIRGINIA A. CAHILL
Deputy Attorney General

11
12 
13 MICHAEL L. CROW
Deputy Attorney General

14 Attorneys for State of California, Santa
15 Monica Mountains Conservancy, and State of
16 California 50th District Agricultural
17 Association.
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VERIFICATION

I, RUSS DINGMAN, declare as follows:

I am the Outdoor Recreation Planner for the California Department of Parks and Recreation, an agency of the State of California, one of the parties hereto; I am authorized to make this verification for and on behalf of said entity. I have read the foregoing Responses to Request for Form Interrogatories and know the contents thereof.

The information necessary to prepare the responses of California Department of Parks and Recreation to Plaintiff's Request for Form Interrogatories was obtained from numerous sources within California Department of Parks and Recreation and the response was prepared with the advice and assistance of legal counsel. Accordingly, I rely on these individuals for the accuracy of the information stated in the responses. On that basis, I am informed and believe that the matters stated therein are true, correct and complete.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 8, 2008, in Lancaster, California.

By: Russ D
RUSS DINGMAN

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VERIFICATION

I, BARBARA DUGAL, declare as follows:

I am Chief of the Land Management Division of the State Lands Commission, an agency of the State of California, one of the parties hereto; I am authorized to make this verification for and on behalf of said entity. I have read the foregoing Responses to Form Interrogatories and know the contents thereof.

The information necessary to prepare the responses of State Lands Commission to Plaintiff's Request for Form Interrogatories was obtained from numerous sources within the State Lands Commission and the response was prepared with the advice and assistance of legal counsel. Accordingly, I rely on these individuals for the accuracy of the information stated in the responses. On that basis, I am informed and believe that the matters stated therein are true, correct and complete.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 11, 2008, in Sacramento, California.

By: Barbara Dugal
BARBARA DUGAL

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VERIFICATION

I, THOMAS P. HALLENBECK, declare as follows:

I am the Director for Caltrans District 9, an agency of the State of California, one of the parties hereto; I am authorized to make this verification for and on behalf of said entity. I have read the foregoing Responses to Request for Form Interrogatories and know the contents thereof.

This verification is limited to the information supplied pertaining to the well at the Boron Rest areas.

The information necessary to prepare the responses of Caltrans to Plaintiff's Request for Form Interrogatories was obtained from numerous sources within Caltrans and the response was prepared with the advice and assistance of legal counsel. Accordingly, I rely on these individuals for the accuracy of the information stated in the responses. On that basis, I am informed and believe that the matters stated therein are true, correct and complete.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 7, 2008, in Bishop, California.

By: THOMAS P. HALLENBECK
THOMAS P. HALLENBECK

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VERIFICATION

I, WILLIAM H. REAGAN, declare as follows:

I am the Deputy Director for Design, District 7, at Caltrans, an agency of the State of California, one of the parties hereto; I am authorized to make this verification for and on behalf of said entity. I have read the foregoing Responses to Request for Form Interrogatories and know the contents thereof. This verification is limited to information supplied pertaining to the park and ride lots in Lancaster and Palmdale, the Little Rock Wash Mitigation parcels and the Lancaster Maintenance Station.

The information necessary to prepare the responses of Caltrans to Plaintiff's Request for Form Interrogatories was obtained from numerous sources within Caltrans and the response was prepared with the advice and assistance of legal counsel. Accordingly, I rely on these individuals for the accuracy of the information stated in the responses. On that basis, I am informed and believe that the matters stated therein are true, correct and complete.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 14th, 2008, in Los Angeles, California.

By: William H. Reagan

WILLIAM H. REAGAN

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VERIFICATION

1, RORIE SKEI, declare as follows:

I am the Chief Deputy Director for Santa Monica Mountains Conservancy, an agency of the State of California, one of the parties hereto; I am authorized to make this verification for and on behalf of said entity. I have read the foregoing Responses to Request for Form Interrogatories and know the contents thereof.

The information necessary to prepare the responses of Santa Monica Mountains Conservancy to Plaintiff's Request for Form Interrogatories was obtained from numerous sources within Santa Monica Mountains Conservancy and the response was prepared with the advice and assistance of legal counsel. Accordingly, I rely on these individuals for the accuracy of the information stated in the responses. On that basis, I am informed and believe that the matters stated therein are true, correct and complete.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 8, 2008, in Malibu, California.

By: Rorie Skei

RORIE SKEI

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3 **VERIFICATION**

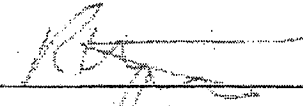
4 I, RICHARD WYATT, declare as follows:

5 I am the Dept. Construction and Maintenance Supervisor for the California Department
6 of Veterans Affairs, an agency of the State of California, one of the parties hereto, I am
7 authorized to make this verification for and on behalf of said entity. I have read the foregoing
8 Responses to Request for Form Interrogatories and know the contents thereof.

9 The information necessary to prepare the responses of California Department of Veterans
10 Affairs to Plaintiff's Request for Form Interrogatories was obtained from numerous sources
11 within California Department of Veterans Affairs and the response was prepared with the advice
12 and assistance of legal counsel. Accordingly, I rely on these individuals for the accuracy of the
13 information stated in the responses. On that basis, I am informed and believe that the matters
14 stated therein are true, correct and complete.

15 I declare under penalty of perjury that the foregoing is true and correct.

16 Executed on 7-8-08, 2008, in Sacramento 2, California.

17 By: 

18 RICHARD WYATT
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VERIFICATION

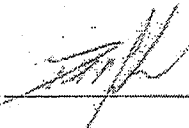
I, DAN JACOBS, declare as follows:

I am Chief Executive Officer of the Fiftieth (50th) District Agricultural Association, an agency of the State of California, one of the parties hereto; I am authorized to make this verification for and on behalf of said entity. I have read the foregoing Responses to Request for Form Interrogatories and know the contents thereof.

The information necessary to prepare the responses of Fiftieth (50th) District Agricultural Association to Plaintiff's Request for Form Interrogatories was obtained from numerous sources within the Fiftieth (50th) District Agricultural Association and the response was prepared with the advice and assistance of legal counsel. Accordingly, I rely on these individuals for the accuracy of the information stated in the responses. On that basis, I am informed and believe that the matters stated therein are true, correct and complete.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 8, 2008, in Lancaster, California.

By: 

DAN JACOBS

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VERIFICATION

I, LT. ANDRIA D. WITMER, declare as follows:

I am the Lieutenant of the California Highway Patrol Antelope Valley area office for the California Department of Highway Patrol, an agency of the State of California, one of the parties hereto. I am authorized to make this verification for and on behalf of said entity. I have read the foregoing Responses to Request for Form Interrogatories and know the contents thereof.

The information necessary to prepare the responses of California Department of Highway Patrol to Plaintiff's Request for Form Interrogatories was obtained from numerous sources within California Department of Highway Patrol and the response was prepared with the advice and assistance of legal counsel. Accordingly, I rely on these individuals for the accuracy of the information stated in the responses. On that basis, I am informed and believe that the matters stated therein are true, correct and complete.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 9, 2008, in LANCASTER, California.

By: Andria D. Witmer

LT. ANDRIA D. WITMER

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VERIFICATION

I, MARK OUIMET, am the Chief of the Real Estate Branch for the California Military Department. I have reviewed the foregoing *Responses to Plaintiff's Form Interrogatories, Set One*. The responses are true to the best of my knowledge, except where stated, on information and belief and as to such matters I believe them to be true.

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

Executed on 15 July, 2008, at Joint Forces Headquarters, Sacramento, California.



MARK OUIMET
CPT, USAR (Retired)
Chief, Real Estate Branch

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VERIFICATION

I, ROBERT L. PIEROTTI, declare as follows:

I am Chief of the Resources Assessment Branch of the Southern District of the Department of Water Resources, an agency of the State of California, one of the parties hereto; I am authorized to make this verification for and on behalf of said entity. I have read the foregoing Responses to Request for Form Interrogatories and know the contents thereof.

The information necessary to prepare the responses of Department of Water Resources to Plaintiff's Request for Form Interrogatories was obtained from numerous sources within the Department of Water Resources and the response was prepared with the advice and assistance of legal counsel. Accordingly, I rely on these individuals for the accuracy of the information stated in the responses. On that basis, I am informed and believe that the matters stated therein are true, correct and complete.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 16, 2008, in Glendale, California.

By: 

ROBERT L. PIEROTTI

1 EDMUND G. BROWN JR.
Attorney General of the State of California

2 DANIEL L. SIEGEL
Supervising Deputy Attorney General

3 MICHAEL CROW, State Bar No. 70498
Deputy Attorney General

4 VIRGINIA CAHILL, State Bar No. 99167
Deputy Attorney General

5 1300 I Street

P.O. Box 944255

6 Sacramento, CA 94244-2550

Telephone: (916) 322-5647

7 Fax: (916) 327-2319

Attorneys for State of California, Santa Monica
Mountains Conservancy, and State of California 50th
District and Agricultural Association

8
9 SUPERIOR COURT OF CALIFORNIA

10 COUNTY OF LOS ANGELES

11
12 Coordination Proceeding
Special Title (Rule 1550(b))

Judicial Council Coordination
Proceeding No. 4408

13 ANTELOPE VALLEY GROUNDWATER
CASES

Assigned to The Honorable
Jack Komar

14 Included Actions:

15 Los Angeles County Waterworks District No. 40 v.
Diamond Farming Co.

16 Superior Court of California County of Los Angeles,
Case No. BC 325 201

17 Los Angeles County Waterworks District No. 40 v.
Diamond Farming Co.

18 Superior Court of California, County of Kern,
Case No. S-1500-CV-254-348

19 Wm. Bolthouse Farms, Inc. v. City of Lancaster
Diamond Farming Co. v. City of Lancaster
20 Diamond Farming Co. v. Palmdale Water Dist.
21 Superior Court of California, County of Riverside,
22 consolidated Actions, Case Nos. RIC 353 840, RIC
344 436, RIC 344 668

DEFENDANT, STATE OF
CALIFORNIA'S RESPONSE TO
REBECCA WILLIS' REQUEST
FOR ADMISSIONS
PROPOUNDED ON EACH
OVERLYING LANDOWNER
AND MUTUALLY WATER
COMPANY LISTED ON
EXHIBIT 1

23
24 AND RELATED ACTIONS.
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1 **RESPONSE TO REQUESTS FOR ADMISSIONS**

2
3 PROPOUNDING PARTY: REBECCA WILLIS

4 RESPONDING PARTY: STATE OF CALIFORNIA, ON BEHALF OF SANTA MONICA
5 MOUNTAINS CONSERVANCY, 50TH DISTRICT
6 AGRICULTURAL ASSOCIATION, AND ALL OTHER STATE
AGENCIES OWNING LAND WITHIN THE ADJUDICATION
BOUNDARY (Hereafter referred to as "State").

7 SET: ONE

8
9 **REQUEST FOR ADMISSION NO. 1:**

10 Admit that the landowners in the Willis Class have water rights to the groundwater
11 underlying their properties in the Basin.

12 **RESPONSE TO REQUESTS FOR ADMISSION NO. 1:**

13 The State is unable to admit or deny this request because it lacks sufficient information or
14 knowledge whether the landowners in the Willis Class have water rights to the groundwater
15 underlying their properties in the Basin. The State agrees that as a general legal proposition,
16 overlying landowners have water rights to the groundwater underlying their properties, unless such
17 rights have been lost to prescription, and subject to the requirement that all water in California must
18 be used reasonably and beneficially.

19 **REQUEST FOR ADMISSION NO. 2:**

20 Admit that the Willis Class' water rights in the groundwater are property rights.

21 **RESPONSE TO REQUESTS FOR ADMISSION NO. 2:**

22 The State is unable to admit or deny this request because it lacks sufficient information or
23 knowledge whether the Willis Class' water rights in the groundwater are property rights. The State
24 agrees that as a general legal proposition, overlying landowners' water rights in groundwater are
25 treated as property rights although they are subject to the requirement that the use of water must be
26 reasonable and beneficial and privately-held overlying rights may be lost to prescription.

27 **REQUEST FOR ADMISSION NO. 3:**

28 Admit that the landowners in the Willis Class have a real property interest in the use of

1 groundwater in the Basin that is appurtenant to their land.

2 **RESPONSE TO REQUESTS FOR ADMISSION NO. 3:**

3 The State is unable to admit or deny this request because it lacks sufficient information or
4 knowledge whether the Willis Class have a real property interest in the use of groundwater in the
5 Basin that is appurtenant to their land. The State agrees that as a general legal proposition, overlying
6 landowners have a real property interest in the use of groundwater in the Basin that is appurtenant
7 to their land unless such rights have been lost to prescription, and subject to the requirement that all
8 water in California must be used reasonably and beneficially.

9 **REQUEST FOR ADMISSION NO. 4:**

10 Admit that the landowners in the Willis Class have a right to use the groundwater underlying
11 their properties that is superior to the right of any appropriator to use the groundwater in the Basin

12 **RESPONSE TO REQUESTS FOR ADMISSION NO. 4:**

13 At this stage of the case, the State is unable to admit or deny this request because it lacks
14 sufficient information and knowledge.

15 **REQUEST FOR ADMISSION NO. 5:**

16 Admit that as among all overlying landowners, the landowners in the Willis Class have
17 correlative rights to use the groundwater in the Basin.

18 **RESPONSE TO REQUESTS FOR ADMISSION NO. 5:**

19 The State lacks sufficient information or knowledge to admit that as among all overlying
20 landowners, the landowners in the Willis Class have correlative rights to use the groundwater in the
21 Basin. The State agrees that as a general legal proposition, overlying landowners share correlative
22 rights to use groundwater, but such rights are subject to the requirements of the California
23 Constitution, article X, section 2, that all use of water must be reasonable and beneficial, and
24 overlying rights held by private parties may be lost by prescription.

25 **REQUEST FOR ADMISSION NO. 6:**

26 Admit that within the jurisdictional boundary of the Antelope Valley, as defined in the
27 Revised Order dated March 12, 2007, there are sub-basins.

28

1 **RESPONSE TO REQUESTS FOR ADMISSION NO. 6:**

2 Objection. The request is too ambiguous and vague to be able to specifically admit or deny,
3 in that it does not define the term "sub-basin." Sub-basin is a technical scientific term, the meaning
4 of which experts may disagree. Without waiving said objection, the State's response is: DENIED.
5 In the "EXPERT DECLARATION OF ROBERT L. PIEROTTI IN SUPPORT OF STATE OF
6 CALIFORNIA'S POSITION ON ANTELOPE VALLEY GROUNDWATER BASIN
7 BOUNDARIES," Mr. Pierotti observes that the "Antelope Valley overlies a large sediment-filled
8 structural basin that is broken by several faults including the San Andreas, Randsburg-Mojave,
9 Cottonwood, Willow Springs, Rosamond, Neenach, El Mirage, Spring, and Blake Ranch faults. To
10 varying degrees, these faults impede the flow of groundwater within the Antelope Valley
11 Groundwater Basin, and *some of these faults have been used by some investigators as subunit*
12 *boundaries.*" (Emphasis added.) *California's Groundwater (Bulletin 118-Update 2003)*, pp. 192-
13 199, published by the Department of Water Resources, does not attribute sub-basins to the Antelope
14 Valley Groundwater Basin.

15 **REQUEST FOR ADMISSION NO. 7:**

16 Admit that YOU have pumped groundwater from the Basin each year since 1990.

17 **RESPONSE TO REQUESTS FOR ADMISSION NO. 7:**

18 Denied as to the following state agencies: State Lands Commission, Santa Monica Mountains
19 Conservancy, 50th District Agricultural Association, Department of Veterans' Affairs, Department
20 of the Military, California Highway Patrol, Department of Corrections.

21 Admitted as to the following state agencies: Caltrans, Department of Water Resources.

22 The Department of Parks and Recreation lacks specific records as to whether it has pumped
23 groundwater each year since 1990. The agency has pumped groundwater some years since 1990.

24 **REQUEST FOR ADMISSION NO. 8:**

25 Admit that for each year since 1990 there was no overdraft in the Basin.

26 **RESPONSE TO REQUESTS FOR ADMISSION NO. 8:**

27 At this stage of the case, the State is unable to admit or deny this request because it lacks
28 sufficient information and knowledge, and on that basis, the State denies said request.

REQUEST FOR ADMISSION NO. 9:

Admit that before the Court can grant any relief to YOU, YOU must show that you made a reasonable and beneficial use of the water.

RESPONSE TO REQUESTS FOR ADMISSION NO. 9:

Denied. Overlying state agencies may receive relief with regard to rights to present and future reasonable and beneficial uses of water.

REQUEST FOR ADMISSION NO.10:

Admit that YOUR use of the water was not reasonable and beneficial.

RESPONSE TO REQUESTS FOR ADMISSION NO. 10:

Denied. All water use by all state agencies has been reasonable and beneficial.

REQUEST FOR ADMISSION NO. 11:

Admit that YOU have not filed a Notice of Extraction as required by California Water Code sections 4999 to 5009 for each year since 1955 that you have extracted more than 25 acre-feet of ground water from the Basin.

RESPONSE TO REQUESTS FOR ADMISSION NO. 11:

Admitted as to Department of Water Resources.

Denied as to all other state agencies on the grounds that they were not required to file Notices of Extraction under Water Code sections 4999 to 5009.

REQUEST FOR ADMISSION NO. 12:

Admit that the Willis Class' overlying groundwater rights have not been lost to prescription.

RESPONSE TO REQUESTS FOR ADMISSION NO. 12:

The State lacks sufficient information or knowledge to admit or deny that the Willis Class' overlying groundwater rights have not been lost to prescription.

REQUEST FOR ADMISSION NO.13:

Admit that YOU have not purchased any State Project, i.e. imported water, over the relevant period.

RESPONSE TO REQUESTS FOR ADMISSION NO. 13:

Admitted as to Department of Water Resources. DWR operates the State Water Project, and

1 does not purchase SWP water, either directly from the SWP or indirectly through a SWP contractor.

2 Admitted as to State Lands Commission and Santa Monica Mountains Conservancy.

3 The other state agencies are unable to fully admit or fully deny this request for admission,
4 and on that basis deny the request for admission. These other state agencies have not directly
5 purchased any State Water Project water, but they have purchased water from public sources which
6 may include SWP water, groundwater, or a combination of both.

7 **REQUEST FOR ADMISSION NO. 14:**

8 Admit that YOU have not transferred or sold groundwater from the Basin over the relevant
9 period.

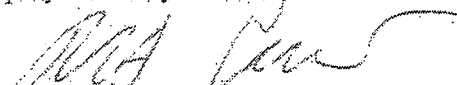
10 **RESPONSE TO REQUESTS FOR ADMISSION NO. 14:**

11 Admitted.

12
13 Dated: 7-18-08

14 Respectfully submitted,

15
16 EDMUND G. BROWN JR.
Attorney General of the State of California
17 DANIEL L. SIEGEL
Supervising Deputy Attorney General
18 VIRGINIA A. CAHILL
Deputy Attorney General

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MICHAEL L. CROW
21 Deputy Attorney General

22 Attorneys for State of California, Santa
Monica Mountains Conservancy, and State of
23 California 50th District Agricultural
24 Association.
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VERIFICATION

I, RUSS DINGMAN, declare as follows:

I am the Outdoor Recreation Planner for the California Department of Parks and Recreation, an agency of the State of California, one of the parties hereto; I am authorized to make this verification for and on behalf of said entity. I have read the foregoing Responses to Request for Admissions and know the contents thereof.

The information necessary to prepare the responses of California Department of Parks and Recreation to Plaintiff's Request for Admissions was obtained from numerous sources within California Department of Parks and Recreation and the response was prepared with the advice and assistance of legal counsel. Accordingly, I rely on these individuals for the accuracy of the information stated in the responses. On that basis, I am informed and believe that the matters stated therein are true, correct and complete.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on JUN 8, 2008, in Lancaster, California.

By: Russ D

RUSS DINGMAN

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VERIFICATION

I, BARBARA DUGAL, declare as follows:

I am Chief of the Land Management Division of the State Lands Commission, an agency of the State of California, one of the parties hereto; I am authorized to make this verification for and on behalf of said entity. I have read the foregoing Responses to Admissions and know the contents thereof.

The information necessary to prepare the responses of State Lands Commission to Plaintiff's Request for Admission was obtained from numerous sources within the State Lands Commission and the response was prepared with the advice and assistance of legal counsel. Accordingly, I rely on these individuals for the accuracy of the information stated in the responses. On that basis, I am informed and believe that the matters stated therein are true, correct and complete.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 11, 2008, in Sacramento, California.

By: Barbara Dugal

BARBARA DUGAL

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VERIFICATION

I, THOMAS P. HALLENBECK, declare as follows:

I am the Director for Caltrans District 9, an agency of the State of California, one of the parties hereto; I am authorized to make this verification for and on behalf of said entity. I have read the foregoing Responses to Request for Admissions and know the contents thereof. This verification is limited to the information supplied pertaining to the well at the Boron Rest areas.

The information necessary to prepare the responses of Caltrans to Plaintiff's Request for Admissions was obtained from numerous sources within Caltrans and the response was prepared with the advice and assistance of legal counsel. Accordingly, I rely on these individuals for the accuracy of the information stated in the responses. On that basis, I am informed and believe that the matters stated therein are true, correct and complete.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 7, 2008, in Bishop, California.

By: Thomas P. Hallenbeck

THOMAS P. HALLENBECK

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VERIFICATION

I, WILLIAM H. REAGAN, declare as follows:

I am the Deputy Director for Design, District 7, at Caltrans, an agency of the State of California, one of the parties hereto; I am authorized to make this verification for and on behalf of said entity. I have read the foregoing Responses to Request for Admissions and know the contents thereof. This verification is limited to information supplied pertaining to the park and ride lots in Lancaster and Palmdale, the Little Rock Wash Mitigation parcels and the Lancaster Maintenance Station.

The information necessary to prepare the responses of Caltrans to Plaintiff's Request for Admissions was obtained from numerous sources within Caltrans and the response was prepared with the advice and assistance of legal counsel. Accordingly, I rely on these individuals for the accuracy of the information stated in the responses. On that basis, I am informed and believe that the matters stated therein are true, correct and complete.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 14th, 2008, in LOS ANGELES, California.

By: William H. Reagan

WILLIAM H. REAGAN

1 VERIFICATION

2
3 I, RORIE SKEI, declare as follows:

4 I am the Chief Deputy Director for Santa Monica Mountains Conservancy, an agency of
5 the State of California, one of the parties hereto; I am authorized to make this verification for and
6 on behalf of said entity. I have read the foregoing Responses to Request for Admissions and
7 know the contents thereof.

8 The information necessary to prepare the responses of Santa Monica Mountains
9 Conservancy to Plaintiff's Request for Admissions was obtained from numerous sources within
10 Santa Monica Mountains Conservancy and the response was prepared with the advice and
11 assistance of legal counsel. Accordingly, I rely on these individuals for the accuracy of the
12 information stated in the responses. On that basis, I am informed and believe that the matters
13 stated therein are true, correct and complete.

14 I declare under penalty of perjury that the foregoing is true and correct.

15 Executed on July 8, 2008, in Malibu, California.

16
17 By: Rorie Skei

18 RORIE SKEI
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VERIFICATION

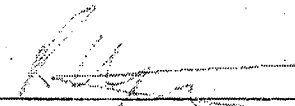
I, RICHARD WYATT, declare as follows:

I am the Dept. Construction and Maintenance Supervisor for the California Department of Veterans Affairs, an agency of the State of California, one of the parties hereto; I am authorized to make this verification for and on behalf of said entity. I have read the foregoing Responses to Request for Admissions and know the contents thereof.

The information necessary to prepare the responses of California Department of Veterans Affairs to Plaintiff's Request for Admissions was obtained from numerous sources within California Department of Veterans Affairs and the response was prepared with the advice and assistance of legal counsel. Accordingly, I rely on these individuals for the accuracy of the information stated in the responses. On that basis, I am informed and believe that the matters stated therein are true, correct and complete.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 7-8-08, 2008, in Sacramento, California.

By: 

RICHARD WYATT

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VERIFICATION

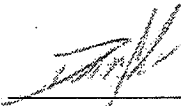
I, DAN JACOBS, declare as follows:

I am Chief Executive Officer of the Fiftieth (50th) District Agricultural Association, an agency of the State of California, one of the parties hereto; I am authorized to make this verification for and on behalf of said entity. I have read the foregoing Responses to Request for Admissions and know the contents thereof.

The information necessary to prepare the responses of Fiftieth (50th) District Agricultural Association to Plaintiff's Request for Admissions was obtained from numerous sources within the Fiftieth (50th) District Agricultural Association and the response was prepared with the advice and assistance of legal counsel. Accordingly, I rely on these individuals for the accuracy of the information stated in the responses. On that basis, I am informed and believe that the matters stated therein are true, correct and complete.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 8, 2008, in Lancaster, California.

By: 

DAN JACOBS

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VERIFICATION

I, LT. ANDRIA D. WITMER, declare as follows:

I am the Lieutenant of the California Highway Patrol Antelope Valley area office for the California Department of Highway Patrol, an agency of the State of California, one of the parties hereto; I am authorized to make this verification for and on behalf of said entity. I have read the foregoing Responses to Request for Admissions and know the contents thereof.

The information necessary to prepare the responses of California Department of Highway Patrol to Plaintiff's Request for Admissions was obtained from numerous sources within California Department of Highway Patrol and the response was prepared with the advice and assistance of legal counsel. Accordingly, I rely on these individuals for the accuracy of the information stated in the responses. On that basis, I am informed and believe that the matters stated therein are true, correct and complete.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 9, 2008, in LANCASTER, California.

By: Andria Witmer

LT. ANDRIA D. WITMER

1 VERIFICATION

2
3 I, MARK OUIMET, am the Chief of the Real Estate Branch for the California Military Department. I
4 have reviewed the foregoing *Responses to Plaintiff's Request for Admissions, Set One*. The responses
5 are true to the best of my knowledge, except where stated, on information and belief and as to such
6 matters I believe them to be true.

7 I declare under penalty of perjury of the laws of the State of California that the above is true and
8 correct.

9 Executed on 15 July, 2008, at Joint Forces Headquarters, Sacramento, California.

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11 

12 MARK OUIMET
13 CPT, USAR (Retired)
14 Chief, Real Estate Branch
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VERIFICATION

I, ROBERT L. PIEROTTI, declare as follows:

I am Chief of the Resources Assessment Branch of the Southern District of the Department of Water Resources, an agency of the State of California, one of the parties hereto; I am authorized to make this verification for and on behalf of said entity. I have read the foregoing Responses to Request for Admissions and know the contents thereof.

The information necessary to prepare the responses of Department of Water Resources to Plaintiff's Request for Admissions was obtained from numerous sources within the Department of Water Resources and the response was prepared with the advice and assistance of legal counsel. Accordingly, I rely on these individuals for the accuracy of the information stated in the responses. On that basis, I am informed and believe that the matters stated therein are true, correct and complete.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 16, 2008, in Glen Dale, California.

By: 

ROBERT L. PIEROTTI

1 EDMUND G. BROWN JR.
Attorney General of the State of California
2 DANIEL L. SIEGEL
Supervising Deputy Attorney General
3 MICHAEL CROW, State Bar No. 70498
Deputy Attorney General
4 VIRGINIA CAHILL, State Bar No. 99167
Deputy Attorney General
5 1300 I Street
P.O. Box 944255
6 Sacramento, CA 94244-2550
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9 SUPERIOR COURT OF CALIFORNIA

10 COUNTY OF LOS ANGELES

11 Coordination Proceeding
12 Special Title (Rule 1550(b))

13 ANTELOPE VALLEY GROUNDWATER
14 CASES

14 Included Actions:

15 Los Angeles County Waterworks District No. 40 v.
Diamond Farming Co.
16 Superior Court of California County of Los Angeles,
Case No. BC 325 201

17 Los Angeles County Waterworks District No. 40 v.
18 Diamond Farming Co.
Superior Court of California, County of Kern,
19 Case No. S-1500-CV-254-348

20 Wm. Bolthouse Farms, Inc. v. City of Lancaster
Diamond Farming Co. v. City of Lancaster
21 Diamond Farming Co. v. Palmdale Water Dist.
Superior Court of California, County of Riverside,
22 consolidated Actions, Case Nos. RIC 353 840, RIC 344
436, RIC 344 668

23
24 AND RELATED ACTIONS.
25
26
27
28

Judicial Council Coordination
Proceeding No. 4408

Assigned to The Honorable
Jack Komar

DEFENDANT, STATE OF
CALIFORNIA'S RESPONSE TO
REBECCA WILLIS' REQUEST
FOR PRODUCTION OF
DOCUMENTS PROPOUNDED
ON EACH OVERLYING
LANDOWNER AND MUTUAL
WATER COMPANY LISTED
ON EXHIBIT 1

1 PROPOUNDING PARTY: REBECCA WILLIS

2 RESPONDING PARTY: STATE OF CALIFORNIA, ON BEHALF OF ALL STATE
3 AGENCIES WHICH ARE OVERLYING LAND OWNERS,
4 INCLUDING SANTA MONICA MOUNTAINS CONSERVANCY,
5 AND STATE OF CALIFORNIA 50TH DISTRICT AND
6 AGRICULTURAL ASSOCIATION, AND ALL OTHER STATE
7 AGENCIES OWNING LAND WITHIN THE ADJUDICATION
8 BOUNDARY (Hereafter referred to as "State")

9 SET: ONE

10 The State responds to Rebecca Willis's Request for Production of Documents, Set One, as
11 follows:

12 PRELIMINARY STATEMENT

13 It should be noted that the responding party has not fully completed its
14 investigation of the facts relating to this case, has not completed its discovery in the action, and
15 has not completed its preparation for trial. All of the responses contained herein are based only
16 upon such information and documents which are presently available and specifically known to
17 the responding party and disclose only those contentions which presently occur to responding
18 party. It is anticipated that further discovery, independent investigation, legal research and
19 analysis will supply additional facts, add meaning to known facts, as well as establish entirely
20 new factual conclusions and legal contentions, all of which may lead to substantial additions,
21 changes in, and variations from the contentions herein set forth. The following responses are
22 given without prejudice to the responding party's right to produce evidence of any subsequently
23 discovered fact or facts which the responding party may later discover or recall. The responding
24 party accordingly reserves the right to change any and all responses herein as additional
25 documents are located, facts are ascertained, analyses made, legal research is completed and
26 contentions are made. The responses herein are made in a good faith effort to supply as much
27 document information as is presently known, but should in no way be to the prejudice of the
28 responding party in relation to further discovery, research or analysis.

29 GENERAL OBJECTIONS

30 The following general objections are expressly incorporated into each of the specific
31 responses set forth below:

1 1. State objects to the request for documents to the extent it calls for the disclosure
2 of information protected by the attorney-client privilege, the attorney work product doctrine, or
3 any other applicable privilege or provision for confidentiality, including personal information
4 concerning state employees (Government Code §§ 6254, 6254.3).

5 2. The State and all State agencies object to the Request insofar as it calls for the
6 production of documents contained in the official records of a state agency to take place at the
7 office of KRAUSE, KALFAYAN, BENINK & SLAVENS LLP, 625 Broadway, Suite 635, San
8 Diego, California. All of the documents and files responsive to this request are located in the
9 offices of the State agencies responding to this request. These documents constitute official
10 records of the State of California and are necessary for the conduct of the State's official
11 business. It is unreasonable and unduly burdensome to require any State agency to produce its
12 files and documents outside of the the agency's offices, where said documents are kept in the
13 ordinary course of business. The State hereby offers to make the documents available for
14 inspection at the agency offices where they are kept at such date and time as may be agreed upon
15 between the parties.

16 3. By way of further preliminary statement, the State objects to the demand insofar
17 as it calls for State agencies to separately "identify" each and every document in their files which
18 may be responsive to this request. The State is under no legal obligation to identify each separate
19 document in its files which may be responsive to this request. The State will produce for
20 inspection certain of its files and documents that are voluminous in nature and responsive to this
21 demand as they are kept in the ordinary and usual course of business.

22 4. By way of further preliminary statement, the State objects to plaintiff's alternative
23 demand that the State mail copies of responsive documents to plaintiff's attorney. The State is
24 under no legal obligation to copy or mail any documents produced pursuant to this demand at its
25 own expense and without advance payment by plaintiff of State's copying and mailing costs.
26 Without waiving said objection, the State will mail specified responsive documents to plaintiff's
27 attorneys upon payment of copying and mailing costs.

28

SPECIFIC RESPONSES

REQUEST FOR PRODUCTION NO. 1:

Any and all documents that refer or relate to your ownership of land overlying the Basin.

RESPONSE TO REQUEST FOR PRODUCTION NO. 1:

The State will mail copies of deeds for the following State-owned properties within the adjudication area, except for the Department of Corrections. The State is still attempting to locate deeds for Corrections properties.

Parks - Antelope Valley California Poppy Natural Reserve; Arthur B. Ripley Desert Woodland State Park, Saddleback Butte State Park, and Antelope Valley Indian Museum State Historic Park. - copies of the grant deeds are being provided in hard copy and by disc.

State Lands Commission - Documents that refer or relate to ownership of school land parcels.

Military - Copy of the grant deed.

Caltrans - Deeds to Lancaster Maintenance Station and a site plan, Lancaster Park and Ride, Palmdale Park and Ride, Little Rock Wash Mitigation parcels and the Boron rest Areas. Ownership also includes the Rights of Way to highway 14 from Post Mile (PM) 55 to the Kern County line at PM 77, Highway 138 from PM 0 (San Bernardino County line) to PM 4.5 where it intersects with Hwy 138, Highway 58 from PM 121 to PM 140 and Hwy 138 from approximately 7 miles east of the intersection with I-5 to PM 35 at the intersection with Hwy 14 and then resuming going east from Palmdale at PM 43 to PM 75 at the San Bernardino County Line. The deeds to the parcels located in the respective rights of way are available for review at California Department of Transportation's District Offices in Los Angeles and Bishop, CA. The addresses are: 100 S. Main, Los Angeles, CA, 90012, and 500 S. Main Street, Bishop, CA 93514, except for the right of way on Highway 138 from east of the intersection with Highway 14 to approximately 7 miles east of the intersection with the I-5. Those deeds are available at the County Recorder's Office in Los Angeles.

Santa Monica Mountains Conservancy - Copies of the grant deeds for each property within adjudication area.

1 **Veterans Affairs** - Copy of the deed for the land donated by the City of Lancaster for the
2 construction of the Lancaster Veterans Home.

3 **50th District Agricultural Association** - Copy of the grant deed.

4 **California Highway Patrol** - Copy of the grant deed.

5 **Department of Water Resources** - Copy of the grant deed.

6 **REQUEST FOR PRODUCTION NO. 2:**

7 Any and all documents that refer or relate to your use of groundwater from the Basin.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 2:**

9 The State will mail copies of maps depicting locations of wells for the Boron Rest Stop
10 (Caltrans), Antelope Indian Valley Museum (Parks), California State Prison-Los Angeles County
11 and maps depicting the location of Oso Pumping Plant, California Aqueduct and Cottonwood
12 Chute for the Department of Water Resources. Also, the State will mail a copy of the LAFCO
13 petition for the Lancaster Veterans Home from the Department of Veterans Affairs.

14 **REQUEST FOR PRODUCTION NO. 3:**

15 Any and all documents that refer or relate to your production of groundwater from the
16 Basin.

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 3:**

18 The State will produce documents pursuant to this request. The State will produce
19 confidential Well Completion Reports that are maintained by DWR pursuant to Water Code
20 sections 13751-13752, only if plaintiffs comply with court's "PROTECTIVE ORDER RE
21 DISCLOSURE AND CONFIDENTIALITY OF WELL REPORTS," dated March 8, 2007.
22 DWR does not currently have pumping records from its facilities available for inspection. The
23 State will supplement this response if said records become available.

24 **REQUEST FOR PRODUCTION NO. 4:**

25 Any and all documents that refer or relate to your reasonable and beneficial use of the
26 groundwater from the Basin.

27 **RESPONSE TO REQUEST FOR PRODUCTION NO. 4:**

28 The State will mail a copy of the LAFCO application for Department of Veterans Affairs

1 and a copy of the report of Geotechnical Investigation Proposed Veterans Home Complex dated
2 October 3, 2005. Also, the State will mail brochures and website information from the
3 Department of Parks and Recreation for Ripley Desert Woodland, Saddleback Butte State Park,
4 Antelope Valley Indian Museum and Antelope Valley Poppy Reserve. A disc with this
5 information from Parks is also being provided.

6 **REQUEST FOR PRODUCTION NO. 5:**

7 Any and all documents that refer or relate to your energy costs incurred from pumping
8 groundwater from the Basin.

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 5:**

10 The State will mail:

11 (1) a summary and copies of the Department of Parks and Recreation Southern California
12 Edison bills for 2006 through 2008 that show the monthly charges that the Department incurred
13 to run the pump at the Antelope Valley Indian Museum.

14 (2) the utility bills for the Caltrans Boron Rest Area cover the rest areas and the well. It is
15 impossible to distinguish the charges for the well pump from the charges for the lights. There are
16 no documents associated strictly with the electricity used to pump the water.

17 DWR - no documents available. Energy powering the wells at the Oso and Alamo plants
18 is not separately metered.

19 **REQUEST FOR PRODUCTION NO. 6:**

20 Any and all documents that refer or relate to maps of the adjudication area.

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 6:**

22 The State has no documents that refer or relate to the court-approved map of the
23 adjudication area, other than a copy of the map itself. This map is available on the court's web
24 site and is equally available to plaintiffs. Maps of the Antelope Valley are available at DWR's
25 web site: <http://wdl.water.ca.gov/gw/>.

26 **REQUEST FOR PRODUCTION NO. 7:**

27 Any and all documents that refer or relate to the existence of basins within the
28 adjudication area.

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 7:**

2 Attached is a list of reports responsive to this request in the possession of the Department
3 of Water Resources.

4 **REQUEST FOR PRODUCTION NO. 8:**

5 Any and all documents that refer or relate to the existence of sub-basins within the
6 adjudication area.

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 8:**

8 Attached is a list of reports responsive to this request in the possession of the Department
9 of Water Resources.

10 **REQUEST FOR PRODUCTION NO. 9:**

11 Any and all documents that refer or relate to "well permits."

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 9:**

13 None.

14 **REQUEST FOR PRODUCTION NO. 10:**

15 Any and all compilations that refer or relate to aggregate production of groundwater from
16 the Basin.

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 10:**

18 None, specifically. Generally, see spreadsheet at
19 http://www.waterplan.water.ca.gov/docs/waterpie_spreadsheet.xls.

20 **REQUEST FOR PRODUCTION NO. 11:**

21 Any and all documents that refer or relate to the natural groundwater recharge to the
22 Basin.

23 **RESPONSE TO REQUEST FOR PRODUCTION NO. 11:**

24 Attached is a list of reports responsive to this request in the possession of the Department
25 of Water Resources.

26 **REQUEST FOR PRODUCTION NO. 12:**

27 Any and all documents that refer or relate to groundwater recharge to the Basin from any
28 other source.

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 12:**

2 Attached is a list of reports responsive to this request in the possession of the Department
3 of Water Resources.

4 **REQUEST FOR PRODUCTION NO. 13:**

5 Any and all documents that refer or relate to natural groundwater discharge from the
6 Basin.

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 13:**

8 Attached is a list of reports responsive to this request in the possession of the Department
9 of Water Resources.

10 **REQUEST FOR PRODUCTION NO. 14:**

11 Any and all documents that refer or relate to your pumping of groundwater from the
12 Basin.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 14:**

14 Parks - will mail copies of the 2005 and 2007 annual report on the drinking water
15 program provided to the Department of Health Services.

16 DWR - pumping records for Oso and Alamo plants are currently unavailable. The State
17 will supplement this response if said records become available.

18 **REQUEST FOR PRODUCTION NO. 15:**

19 Any and all documents that refer or relate to agricultural pumping of groundwater from
20 the Basin.

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 15:**

22 Attached is a list of reports responsive to this request in the possession of the Department
23 of Water Resources.

24 **REQUEST FOR PRODUCTION NO. 16:**

25 Any and all documents that refer or relate to land subsidence within the adjudication area.

26 **RESPONSE TO REQUEST FOR PRODUCTION NO. 16:**

27 Attached is a list of reports responsive to this request in the possession of the Department
28 of Water Resources. Also, the State will mail a copy of the Report of Geotechnical Investigation

1 Proposed Veterans Home Complex dated October 3, 2005, together with a copy of the
2 Environmental Impact Report for the Veterans Home being constructed in Lancaster.

3 **REQUEST FOR PRODUCTION NO. 17:**

4 Any and all documents that refer or relate to reduction of groundwater levels in the Basin.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 17:**

6 Attached is a list of reports responsive to this request in the possession of the Department
7 of Water Resources. In addition, see DWR's web site at <http://wdl.water.ca.gov/gw/>. Also, the
8 State will mail a copy of the Report of Geotechnical Investigation Proposed Veterans Home
9 Complex dated October 3, 2005.

10 **REQUEST FOR PRODUCTION NO. 18:**

11 Any and all documents that refer or relate to depletion of the groundwater supply in the
12 Basin.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 18:**

14 Attached is a list of reports responsive to this request in the possession of the Department
15 of Water Resources. Also, the State will mail a copy of the Report of Geotechnical Investigation
16 Proposed Veterans Home Complex dated October 3, 2005.

17 **REQUEST FOR PRODUCTION NO. 19:**

18 Any and all documents that refer or relate to degradation of groundwater quality in the
19 Basin.

20 **RESPONSE TO REQUEST FOR PRODUCTION NO. 19:**

21 Attached is a list of reports responsive to this request in the possession of the Department
22 of Water Resources.

23 **REQUEST FOR PRODUCTION NO. 20:**

24 Any and all documents that refer or relate to your purchase of State Project water from
25 AVEK.

26 **RESPONSE TO REQUEST FOR PRODUCTION NO. 20:**

27 Parks is the only state agency that buys water directly from AVEK. The State will mail
28 copies of AVEK invoices for 2006 and 2007 for the Antelope Valley Poppy Preserve.

1 **REQUEST FOR PRODUCTION NO. 21:**

2 Any and all documents that refer or relate to your importation of any water into the
3 adjudication area.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 21:**

5 The State will mail a copy of Veterans Affairs' LAFCO application. Also responsive to
6 this request is DWR Bulletin 132 series (Management of the State Water Project), located at
7 <http://www.swpao.water.ca.gov/publications/index.cfm>.

8 **REQUEST FOR PRODUCTION NO. 22:**

9 Any and all documents that refer or relate to return flows from your purchase of water
10 from AVEK.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 22:**

12 None.

13 **REQUEST FOR PRODUCTION NO. 23:**

14 Any and all documents that refer or relate to return flows from your use of water in the
15 Basin.

16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 23:**

17 None.

18 **REQUEST FOR PRODUCTION NO. 24:**

19 Any and all documents that refer or relate to return flows from any water that you have
20 imported into the Basin.

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 24:**

22 Caltrans' Boron Rest Stop is on a septic tank, but Caltrans has no documents relating to
23 return flows.

24 The Antelope Indian Valley Museum is on a septic tanks and a site plan and electrical
25 legend of the septic system are provided.

26 Documents responsive to this request are located at the following DWR web site:
27 http://www.waterplan.water.ca.gov/docs/waterpie/balances_spreadsheet.xls

28 **REQUEST FOR PRODUCTION NO. 25:**

1 Any and all documents that refer or relate to return flows from agricultural use of water in
2 the Basin.

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 25:**

4 Documents responsive to this request are located at the following DWR web site:
5 http://www.waterplan.water.ca.gov/docs/waterpie/balances_spreadsheet.xls

6 **REQUEST FOR PRODUCTION NO. 26:**

7 Any and all documents that refer or relate to your use of groundwater in the Basin.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 26:**

9 This request is identical to request no. 2. See response to request no. 2.

10 **REQUEST FOR PRODUCTION NO. 27:**

11 Any and all documents that refer or relate to an overdraft of the Basin.

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 27:**

13 Attached is a list of reports responsive to this request in the possession of the Department
14 of Water Resources.

15 **REQUEST FOR PRODUCTION NO. 28:**

16 Any and all documents that refer or relate to the safe yield of the Basin.

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 28:**

18 Attached is a list of reports responsive to this request in the possession of the Department
19 of Water Resources.

20 **REQUEST FOR PRODUCTION NO. 29:**

21 Any and all documents that refer or relate to the total annual demand on the Basin.

22 **RESPONSE TO REQUEST FOR PRODUCTION NO. 29:**

23 Attached is a list of reports responsive to this request in the possession of the Department
24 of Water Resources.

25 **REQUEST FOR PRODUCTION NO. 30:**

26 Any and all documents that refer or relate to the Municipal Purveyor's claim of
27 prescription.

28 **RESPONSE TO REQUEST FOR PRODUCTION NO. 30:**

1 None.

2 **REQUEST FOR PRODUCTION NO. 31:**

3 Any and all documents that refer or relate to a Notice of Extraction as required by
4 California Water Code sections 4999 to 5009 for each year since 1955 that you have extracted
5 more than 25 acre-feet of groundwater from the Basin.

6 **RESPONSE TO REQUEST FOR PRODUCTION NO. 31:**

7 None.

8 **REQUEST FOR PRODUCTION NO. 32:**

9 Any and all documents that you intend to present at the next phase of the trial in this case.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 32:**

11 The State objects to this request on the grounds that it calls for information covered by
12 the attorney work product or attorney-client privilege.

13 **REQUEST FOR PRODUCTION NO. 33:**

14 If you are an entity or an unincorporated association, please produce any and all articles
15 of incorporation.

16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 33:**

17 Not applicable.

18 **REQUEST FOR PRODUCTION NO. 34:**

19 If you are an entity or an unincorporated association, please produce any and all by-laws.

20 **RESPONSE TO REQUEST FOR PRODUCTION NO. 34:**

21 Not applicable.

22 **REQUEST FOR PRODUCTION NO. 35:**

23 If you are an entity or an unincorporated association, please produce any and all minutes
24 that refer or relate to your pumping of groundwater.

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 35:**

26 Not applicable.

27 **REQUEST FOR PRODUCTION NO. 36:**

28 Any and all documents that refer or relate to your importation of water over the relevant

1 period.

2 **RESPONSE TO REQUEST FOR PRODUCTION NO. 36:**

3 DWR - See DWR Bulletin 132 series (Management of the State Water Project)

4 <http://www.swpao.water.ca.gov/publications/index.cfm>

6 **REQUEST FOR PRODUCTION NO. 37:**

7 Any and all documents that refer or relate to any transfer or sale of groundwater from the
8 Basin.

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 37:**

10 The State will mail a copy of Veterans Affairs' LAFCO application.

11 Dated:

7-18-08

Respectfully submitted,

EDMUND G. BROWN JR.
Attorney General of the State of California
DANIEL L. SIEGEL
Supervising Deputy Attorney General
VIRGINIA A. CAHILL
Deputy Attorney General

MICHAEL L. CROW
Deputy Attorney General

Attorneys for State of California, Santa
Monica Mountains Conservancy, and State of
California 50th District Agricultural
Association.

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VERIFICATION

I, RUSS DINGMAN, declare as follows:

I am the Outdoor Recreation Planner for the California Department of Parks and Recreation, an agency of the State of California, one of the parties hereto; I am authorized to make this verification for and on behalf of said entity. I have read the foregoing Responses to Request for Production of Documents and know the contents thereof.

The information necessary to prepare the responses of California Department of Parks and Recreation to Plaintiff's Request for Production of Documents was obtained from numerous sources within California Department of Parks and Recreation and the response was prepared with the advice and assistance of legal counsel. Accordingly, I rely on these individuals for the accuracy of the information stated in the responses. On that basis, I am informed and believe that the matters stated therein are true, correct and complete.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 8, 2008, in Lancaster, California.

By: Russ Dingo
RUSS DINGMAN

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VERIFICATION

I, BARBARA DUGAL, declare as follows:

I am Chief of the Land Management Division of the State Lands Commission, an agency of the State of California, one of the parties hereto; I am authorized to make this verification for and on behalf of said entity. I have read the foregoing Responses to Request for Production of Documents and know the contents thereof.

The information necessary to prepare the responses of State Lands Commission to Plaintiff's Request for Production of Documents was obtained from numerous sources within the State Lands Commission and the response was prepared with the advice and assistance of legal counsel. Accordingly, I rely on these individuals for the accuracy of the information stated in the responses. On that basis, I am informed and believe that the matters stated therein are true, correct and complete.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 11, 2008, in Escondido, California.

By: Barbara Dugal

BARBARA DUGAL

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VERIFICATION

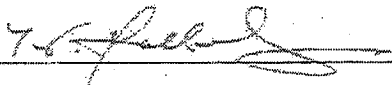
I, THOMAS P. HALLENBECK, declare as follows:

I am the Director for Caltrans District 9, an agency of the State of California, one of the parties hereto; I am authorized to make this verification for and on behalf of said entity. I have read the foregoing Responses to Request for Production of Documents and know the contents thereof. This verification is limited to the documents supplied pertaining to the well at the Boron Rest areas, which are the deeds and the well driller's log.

The information necessary to prepare the responses of Caltrans to Plaintiff's Request for Production of Documents was obtained from numerous sources within Caltrans and the response was prepared with the advice and assistance of legal counsel. Accordingly, I rely on these individuals for the accuracy of the information stated in the responses. On that basis, I am informed and believe that the matters stated therein are true, correct and complete.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 7, 2008, in Bishop, California.

By: 
THOMAS P. HALLENBECK

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VERIFICATION

I, WILLIAM H. REAGAN, declare as follows:

I am the Deputy Director for Design, District 7, at Caltrans, an agency of the State of California, one of the parties hereto; I am authorized to make this verification for and on behalf of said entity. I have read the foregoing Responses to Request for Production of Documents and know the contents thereof. This verification is limited to information supplied pertaining to the park and ride lots in Lancaster and Palmdale, the Little Rock Wash Mitigation parcels and the Lancaster Maintenance Station.

The information necessary to prepare the responses of Caltrans to Plaintiff's Request for Production of Documents was obtained from numerous sources within Caltrans and the response was prepared with the advice and assistance of legal counsel. Accordingly, I rely on these individuals for the accuracy of the information stated in the responses. On that basis, I am informed and believe that the matters stated therein are true, correct and complete.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 14th, 2008, in LOS ANGELES, California.

By: William H. Reagan

WILLIAM H. REAGAN

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VERIFICATION

I, RORIE SKEL, declare as follows:

I am the Chief Deputy Director for Santa Monica Mountains Conservancy, an agency of the State of California, one of the parties hereto; I am authorized to make this verification for and on behalf of said entity. I have read the foregoing Responses to Request for Production of Documents and know the contents thereof.

The information necessary to prepare the responses of Santa Monica Mountains Conservancy to Plaintiff's Request for Production of Documents was obtained from numerous sources within Santa Monica Mountains Conservancy and the response was prepared with the advice and assistance of legal counsel. Accordingly, I rely on these individuals for the accuracy of the information stated in the responses. On that basis, I am informed and believe that the matters stated therein are true, correct and complete.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 8, 2008, in Malibu, California.

By: Rorie Skel

RORIE SKEI

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VERIFICATION

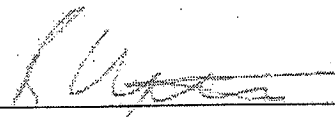
I, RICHARD WYATT, declare as follows:

I am the Dept. Construction and Maintenance Supervisor for the California Department of Veterans Affairs, an agency of the State of California, one of the parties hereto; I am authorized to make this verification for and on behalf of said entity. I have read the foregoing Responses to Request for Production of Documents and know the contents thereof.

The information necessary to prepare the responses of California Department of Veterans Affairs to Plaintiff's Request for Production of Documents was obtained from numerous sources within California Department of Veterans Affairs and the response was prepared with the advice and assistance of legal counsel. Accordingly, I rely on these individuals for the accuracy of the information stated in the responses. On that basis, I am informed and believe that the matters stated therein are true, correct and complete.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 7-6-08, 2008, in San Francisco California.

By: 

RICHARD WYATT

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VERIFICATION

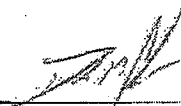
I, DAN JACOBS, declare as follows:

I am Chief Executive Officer of the Fiftieth (50th) District Agricultural Association, an agency of the State of California, one of the parties hereto; I am authorized to make this verification for and on behalf of said entity. I have read the foregoing Responses to Request for Production of Documents and know the contents thereof.

The information necessary to prepare the responses of Fiftieth (50th) District Agricultural Association to Plaintiff's Request for Production of Documents was obtained from numerous sources within the Fiftieth (50th) District Agricultural Association and the response was prepared with the advice and assistance of legal counsel. Accordingly, I rely on these individuals for the accuracy of the information stated in the responses. On that basis, I am informed and believe that the matters stated therein are true, correct and complete.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 8, 2008, in Lancaster, California.

By: 

DAN JACOBS

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VERIFICATION

I, LT. ANDRIA D. WITMER, declare as follows:

I am the Lieutenant of the California Highway Patrol Antelope Valley area office for the California Department of Highway Patrol, an agency of the State of California, one of the parties hereto; I am authorized to make this verification for and on behalf of said entity. I have read the foregoing Responses to Request for Production of Documents and know the contents thereof.

The information necessary to prepare the responses of California Department of Highway Patrol to Plaintiff's Request for Production of Documents was obtained from numerous sources within California Department of Highway Patrol and the response was prepared with the advice and assistance of legal counsel. Accordingly, I rely on these individuals for the accuracy of the information stated in the responses. On that basis, I am informed and believe that the matters stated therein are true, correct and complete.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 9, 2008, in LA ANASTON, California.

By: Andria D. Witmer

LT. ANDRIA D. WITMER

1 VERIFICATION

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3 I, MARK OUMET, am the Chief of the Real Estate Branch for the California Military Department. I
4 have reviewed the foregoing *Responses to Plaintiff's Request for Production of Documents, Set One*.
5 The responses are true to the best of my knowledge, except where stated, on information and belief and as
6 to such matters I believe them to be true.

7 I declare under penalty of perjury of the laws of the State of California that the above is true and
8 correct.

9 Executed on 15 July, 2008, at Joint Forces Headquarters, Sacramento, California.

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12 MARK OUMET
13 CPT, USAR (Retired)
14 Chief, Real Estate Branch
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VERIFICATION

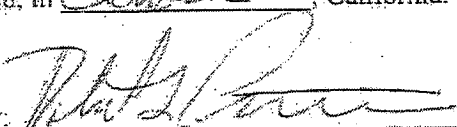
I, ROBERT L. PIEROTTI, declare as follows:

I am Chief of the Resources Assessment Branch of the Southern District of the Department of Water Resources, an agency of the State of California, one of the parties hereto; I am authorized to make this verification for and on behalf of said entity. I have read the foregoing Responses to Request for Production of Documents and know the contents thereof.

The information necessary to prepare the responses of Department of Water Resources to Plaintiff's Request for Production of Documents was obtained from numerous sources within the Department of Water Resources and the response was prepared with the advice and assistance of legal counsel. Accordingly, I rely on these individuals for the accuracy of the information stated in the responses. On that basis, I am informed and believe that the matters stated therein are true, correct and complete.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 16, 2008, in Glen Dale, California.

By: 

ROBERT L. PIEROTTI

CERTIFICATE OF SERVICE

Case Name: **Antelope Valley Groundwater
Cases**

No. **JCCP 4408**

I hereby certify that on December 21, 2012, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

**STATE OF CALIFORNIA, SANTA MONICA MOUNTAINS CONSERVANCY, AND
STATE OF CALIFORNIA 50TH DISTRICT AGRICULTURAL ASSOCIATION'S
PRIOR DISCOVERY RESPONSES AND VERIFICATIONS**

I certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on December 21, 2012, at Los Angeles, California.

Gwen Blanchard
Declarant


Signature