

EXHIBIT C

1 **LEWIS BRISBOIS BISGAARD & SMITH LLP**
MALISSA HATHAWAY McKEITH, SB# 112917

2 E-Mail: mckeith@lbbslaw.com

3 JOSEPH A. SALAZAR, JR., SB# 169551

E-Mail: jsalazar@lbbslaw.com

4 KIMBERLY A. HUANGFU, SB# 252241

E-Mail: huangfu@lbbslaw.com

5 221 North Figueroa Street, Suite 1200

Los Angeles, California 90012

6 Telephone: 213.250.1800

7 Facsimile: 213.250.7900

8 Attorneys for Anaverde LLC

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA

11 COUNTY OF LOS ANGELES, CENTRAL DISTRICT

12
13 ANTELOPE VALLEY GROUNDWATER
CASES

14 Included Actions:

15 Los Angeles County Waterworks District No.
16 40 v. Diamond Farming Co.
Superior Court of California
17 County of Los Angeles, Case No. BC325201;

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

21 Wm. Bolthouse Farms, Inc. v. City of
Lancaster
22 Diamond Farming Co. v. City of Lancaster
Diamond Farming Co. v. Palmdale Water Dist.
23 Superior Court of California
County of Riverside, consolidated actions
24 Case Nos. RIC 353840, RIC 344436,
RIC 344668.

Judicial Council Coordination Proceeding No.
4408

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

Assigned to the Honorable Jack Komar
Dept. 1

**ANAVERDE LLC'S SECOND SET OF
REQUESTS FOR PRODUCTION OF
DOCUMENTS PROPOUNDED ON EACH
PUBLIC WATER SUPPLIER LISTED ON
EXHIBIT 1**

Phase 2 Trial: October 6, 2008

1 **PROPOUNDING PARTY:** ANAVERDE LLC

2 **RESPONDING PARTY:** EVERY PUBLIC WATER SUPPLIER LISTED ON EXHIBIT 1

3 **SET:** TWO

4 **PRELIMINARY STATEMENT**

5 Pursuant to Code of Civil Procedure section 2030.010, *et. seq.*, Anaverde, LLC
6 ("Anaverde") hereby requests that responding party designate and product for inspection and
7 copying the documents and video recording described below that are in or under its possession,
8 custody, or control, or that of its attorneys, agent, or representatives or to which it has access,
9 within thirty (30) days from the date of service of this request. Alternatively, copies may be made
10 of all of the requested documents and forwarded to the offices of Lewis Brisbois Bisgaard &
11 Smith LLP, 221 N. Figueroa Street, Suite 1200, Los Angeles, CA 90012. If you fail to comply
12 with the provisions of California Code of Civil Procedure section 2033.210 with respect to this
13 Request for Admissions, each of the matters to which an admission is requested will be deemed
14 admitted.

15 Anaverde, LLC further requests that responding parties respond in writing to this
16 document request within thirty (30) days from the date of service of these requests as required by
17 section 2031.210 of the Code of Civil Procedure. Section 2031.210 requires Defendants to state,
18 in writing, the following:

- 19 (1) A statement that the party will comply with the particular demand for inspection by the
20 date set for inspection pursuant to paragraph (2) of subdivision (c) of Section 2031.030 and
21 any related activities;
22 (2) A representation that the party lacks the ability to comply with the demand for inspection
23 of a particular item or category of item; and,
24 (3) An objection to the particular demand.

25 With respect to each document, if any, that you withhold from production, please state the
26 basis of your refusal to produce it by:

- 27 (1) Identifying with particularity any document falling within any category of time in the
28

1 demand to which an objection is being made; and,

2 (2) Setting forth clearly the extent of, and the specific ground for, the objection. If an
3 objection is based on a claim of privilege, the particular privilege invoked shall be stated.
4 If an objection is based on a claim that the document sought is protected work product, that
5 claim shall be expressly asserted.

6 If any document is withheld under a claim of privilege or work product, please set forth the
7 following information, pursuant to section 2031.230 of the Code of Civil Procedure, with respect
8 to each document:

- 9 (a) The identify of the person who created the document, and to the extent it differs, the
10 identity of any person who signed the document or over whose name it was sent or issues;
11 (b) The identity of the person or entity to whom the document was sent or directed;
12 (c) A description of the type and the subject matter of the document with sufficient
13 particularity to enable the court and the parties to identify the document;
14 (d) The date of the document;
15 (e) The identity of the person or persons who has or have custody, possession, or control of
16 the original of the document and each copy thereof;
17 (f) The identity of the person that received a copy of the document and his or her employer
18 and job title at the time he or she obtained the document;
19 (g) The number of pages of the document;
20 (h) The basis for the claim of privilege; and,
21 (i) Whether any non-privileged matter is include din the document and, if so, a description of
22 the nature of the non-privileged matter and an identification of the portion of the document
23 that contains such non-privileged matter.

24 To ensure maximum usability, please provide responsive information in electronic files
25 and records, in any of the following formats: standard database format, such as DBF; Microsoft
26 Access; or any other ODBC compatible format.

1 THE SUPERIOR COURT OF CALIFORNIA, COUNTY OF SANTA CLARA
2 ELECTRONIC FILING - WWW.SCEFILING.ORG
3 c/o Glotrans
4 2915 McClure Street
5 Oakland, CA94609
6 TEL: (510) 208-4775
7 FAX: (510) 465-7348
8 EMAIL: Info@Glotrans.com

9 THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 IN AND FOR THE COUNTY OF SANTA CLARA

11 Antelope Valley Groundwater Cases (JCCP 4408))	Antelope Valley Groundwater Cases (JCCP 4408)
)	
12 vs. Plaintiff,)	Lead Case No. 1-05-CV-049053
)	
)	Hon. Jack Komar
13 Defendant.)	
)	
14 AND RELATED ACTIONS)	PROOF OF SERVICE
)	Electronic Proof of Service

15 I am employed in the County of Alameda, State of California.

16 I am over the age of 18 and not a party to the within action; my business address is 2915 McClure
17 Street, Oakland, CA 94609.

18 The documents described on page 2 of this Electronic Proof of Service were submitted via the
19 worldwide web on Fri. August 8, 2008 at 6:17 PM PDT and served by electronic mail notification.

20 I have reviewed the Court's Order Concerning Electronic Filing and Service of Pleading Documents and
21 am readily familiar with the contents of said Order. Under the terms of said Order, I certify the above-described
22 document's electronic service in the following manner:

23 The document was electronically filed on the Court's website, <http://www.scefilling.org>, on Fri. August 8,
2008 at 6:17 PM PDT

Upon approval of the document by the Court, an electronic mail message was transmitted to all parties
on the electronic service list maintained for this case. The message identified the document and provided
instructions for accessing the document on the worldwide web.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and
correct. Executed on August 8, 2008 at Oakland, California.

Dated: August 8, 2008

For WWW.SCEFILING.ORG

Andy Jamieson

1 THE SUPERIOR COURT OF CALIFORNIA, COUNTY OF SANTA CLARA
2 ELECTRONIC FILING SYSTEM - WWW.SCEFILING.ORG

3 Electronic Proof of Service
4 Page 2

5 Document(s) submitted by Kimberly Huangfu of Lewis Brisbois Bisgaard & Smith LLP on Fri. August 8, 2008 at 6:17
6 PM PDT

7 1. Discovery (e-service only): ANAVERDE LLC SECOND SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS
8 PROPOUNDED ON EACH PUBLIC WATER SUPPLIER LISTED ON EXHIBIT 1
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

EXHIBIT D

From: Kimberly Huangfu
To: jeffrey.dunn@BBKLAW.COM
CC: salazar@lbbslaw.com,mckeith@lbbslaw.com,Mestrada@lbbslaw.com
Date: 9/12/2008 10:47 PM
Subject: RE: Antelope Valley - Request for Meet and Confer re PMK Deposition

Mr. Dunn:

Joe Salazar and I will be at the LACWW's facility on Monday morning to review the documents produced in response to our discovery requests. If we are unable to locate the production well data, namely recent groundwater elevation levels and production capacity from 2008, we request that you be available for a conference call on Monday to facilitate the timely retrieval of such documents. If you will be out of the office on Monday, please advise of a telephone number where you can be reached.

If necessary, we will call the Court to schedule a hearing before Judge Komar regarding the appropriateness of your discovery responses. If we are unable to resolve this matter by Monday afternoon, we will go forward with the hearing and the scheduled PMK deposition. As I previously noted, the Court has repeatedly expressed a desire for parties to meet and confer before approaching the Court with discovery disputes. To date, we have not met and conferred to discuss the data we have diligently attempted to locate for the past month.

Thank you.

Best regards,
Kimberly Huangfu

Lewis Brisbois Bisgaard & Smith
221 N. Figueroa Street, Suite 1200
Los Angeles, CA 90012
213.580.3907

>>> "Jeffrey Dunn" <jeffrey.dunn@BBKLAW.COM> 09/11/08 2:31 PM >>>
Kimberly, we are still analyzing the deposition notice. We will be able to meet and confer after we respond to the notice. Thanks, Jeff.

From: Kimberly Huangfu [mailto:huangfu@lbbslaw.com]
Sent: Wednesday, September 10, 2008 10:29 AM
To: Jeffrey Dunn
Cc: Joseph Salazar; Malissa McKeith; Maritza Estrada
Subject: Antelope Valley - Request for Meet and Confer re PMKDeposition

Mr. Dunn:

Based on the last conference call on September 5, 2008, it is our understanding that you intend to file an objection to our PMK deposition notice posted to the Court's website on August 28, 2008. Prior to doing so, we would like to meet and confer.

Please provide me with your availability so that we can discuss this within the next two days. If you prefer that this be resolved with Judge Komar, we are amenable to setting up a conference call, however, it should be noted that pursuant to the Court's Case Management Order for Phase 2, parties are directed to meet and confer concerning any discovery disputes before contacting the Court. Feel free to contact me if you have any questions.

Best regards,

Kimberly

KIMBERLY HUANGFU

LEWIS BRISBOIS BISGAARD & SMITH LLP

221 N. Figueroa Street, Suite 1200, Los Angeles, CA 90012

direct 213.580.3907 | tel 213.250.1800 | fax 213.250.7900

huangfu@lbbslaw.com <mailto:huangfu@lbbslaw.com> |
<http://www.lbbslaw.com> <<http://www.lbbslaw.com>/>

This communication constitutes an electronic communication within the meaning of the

Electronic Communications Privacy Act, 18 USC 2510, and its disclosure

is strictly limited

to the recipient intended by the sender of this message. This communication may contain

confidential and privileged material for the sole use of the intended recipient and receipt

by anyone other than the intended recipient does not constitute a loss of the confidential

or privileged nature of the communication. Any review or distribution by others is strictly

prohibited. If you are not the intended recipient please contact the sender by return

electronic mail and delete all copies of this communication. For more information about

Lewis Brisbois Bisgaard & Smith, visit us at <http://www.lbbslaw.com>
<<http://www.lbbslaw.com>> .

IRS CIRCULAR 230 NOTICE: To ensure compliance with requirements imposed by the IRS, we inform you that any U.S. tax advice contained in this communication (or in any attachment) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed in this communication (or in any attachment).

This email and any files transmitted with it may contain privileged or otherwise confidential information. If you are not the intended recipient, or believe that you may have received this communication in error, please advise the sender via reply email and delete the email you received.

EXHIBIT E

From: "Daniel Roberts" <Daniel.Roberts@bbklaw.com>
To: "Kimberly Huangfu" <huangfu@lbbslaw.com>
CC: "Eric Garner" <Eric.Garner@bbklaw.com>, "Jeffrey Dunn" <jeffrey.dunn@BBK...
Date: 9/17/2008 9:08 AM
Subject: RE: Antelope Valley Groundwater -- spreadsheet

(1) We have provided you with the document as it is kept by the District. Unfortunately, the "total" column has a typo in the year marker for some of the years, but that is how the document exists. We are not going to modify the document, nor are we going to create a new document. We have provided the information you requested in the form in which it exists.

(2) My understanding is that the July and August 2008 raw data have been collected in the field, but that information has not yet been processed, as there is a lag in processing such items, particularly in the high-demand summer months. No, that data will not be available by the close of business today. We have provided on this spreadsheet data the most-recent data that is available, which covers the last 18 1/2 years (222 months). We will provide the later data once it is available.

-----Original Message-----

From: Kimberly Huangfu [mailto:huangfu@lbbslaw.com]
Sent: Tuesday, September 16, 2008 10:12 PM
To: Daniel Roberts
Cc: Eric Garner; Jeffrey Dunn; Stefanie Hedlund; Joseph Salazar; Malissa McKeith
Subject: RE: Antelope Valley Groundwater -- spreadsheet

While I understand that you are unable to alter the document, we need a comprehensive spreadsheet with proper labeling. Though the individual tabs at the bottom of the screen are correctly labeled, when one goes to print the individual spreadsheets, the tabs are not printed and therefore not accurately reflected in the printout.

As for the July and August 2008 meter readings, this data should be readily available since meter readings are routinely collected at the end of each month. As such, your client should be able to access this data with relative ease. Let me know if you are unable to obtain the July and August 2008 meter readings by the close of business on Wednesday. If this is the case, we will have to go to the Judge and explain our situation.

Thanks,
Kimberly

>>> "Daniel Roberts" <Daniel.Roberts@bbklaw.com> 09/16/08 4:26 PM >>>
I noticed that typo in the later sheets as well, but the tabs for those years clearly identify which year is referenced, and the document says what it says; I can't alter the document.

As far as your other questions you asked by telephone earlier today, I am still waiting on an answer re the July and August data -- I know it's not available now, but I'm not sure yet how soon we can get it to you.

As for the maps, all the District's maps are printed with that disclaimer, so we have no maps to produce to you without that disclaimer on them.

-Dan

From: Kimberly Huangfu [mailto:huangfu@lbbslaw.com]
Sent: Tuesday, September 16, 2008 12:26 PM
To: Daniel Roberts
Cc: Eric Garner; Jeffrey Dunn; Stefanie Hedlund; Joseph Salazar; Malissa McKeith
Subject: Fwd: Antelope Valley Groundwater -- spreadsheet

Thanks, Dan. Years 2002-2008 are still mislabeled as 2001. Can you please correct those cells and email the revised spreadsheet back to me?

KIMBERLY HUANGFU

LEWIS BRISBOIS BISGAARD & SMITH LLP

221 N. Figueroa Street, Suite 1200, Los Angeles, CA 90012

direct 213.580.3907 | tel 213.250.1800 | fax 213.250.7900

huangfu@lbbslaw.com <<mailto:huangfu@lbbslaw.com>> |
<http://www.lbbslaw.com> <<http://www.lbbslaw.com>>

This communication constitutes an electronic communication within the meaning of the

Electronic Communications Privacy Act, 18 USC 2510, and its disclosure is strictly limited

to the recipient intended by the sender of this message. This communication may contain

confidential and privileged material for the sole use of the intended recipient and receipt

by anyone other than the intended recipient does not constitute a loss of the confidential

or privileged nature of the communication. Any review or distribution by others is strictly

prohibited. If you are not the intended recipient please contact the sender by return

electronic mail and delete all copies of this communication. For more information about

Lewis Brisbois Bisgaard & Smith, visit us at <http://www.lbbsslaw.com> <<http://www.lbbsslaw.com/>> .

>>>

From:

"Daniel Roberts" <Daniel.Roberts@bbklaw.com>

To:

"Kimberly Huangfu" <huangfu@lbbsslaw.com>

CC:

"Jeffrey Dunn" <jeffrey.dunn@BBKLAW.COM>, "Eric Garner" <Eric.Garner@bbklaw.com>, "Stefanie Hedlund" <Stefanie.Hedlund@bbklaw.com>

Date:

9/16/2008 12:17 PM

Subject:

Antelope Valley Groundwater -- spreadsheet

As we discussed, please find attached the electronic version of the spreadsheet. I will ask about the other two items you mentioned and get back to you as soon as I can.

Daniel S. Roberts for
Best Best & Krieger LLP
Daniel.Roberts@bbklaw.com

IRS CIRCULAR 230 NOTICE: To ensure compliance with requirements imposed by the IRS, we inform you that any U.S. tax advice contained in this communication (or in any

attachment) is not intended or written to be used, and cannot be used,
for the
purpose of (i) avoiding penalties under the Internal Revenue Code or
(ii)
promoting, marketing or recommending to another party any transaction or
matter
addressed in this communication (or in any attachment).

This email and any files transmitted with it may contain privileged or
otherwise confidential information. If you are not the intended
recipient,
or believe that you may have received this communication in error,
please advise the sender via reply email and delete the email you
received.

IRS CIRCULAR 230 NOTICE: To ensure compliance with requirements imposed
by the IRS,
we inform you that any U.S. tax advice contained in this communication
(or in any
attachment) is not intended or written to be used, and cannot be used,
for the
purpose of (i) avoiding penalties under the Internal Revenue Code or
(ii)
promoting, marketing or recommending to another party any transaction or
matter
addressed in this communication (or in any attachment).

This email and any files transmitted with it may contain privileged or
otherwise confidential information. If you are not the intended
recipient,
or believe that you may have received this communication in error,
please advise the sender via reply email and delete the email you
received.

IRS CIRCULAR 230 NOTICE: To ensure compliance with requirements imposed by the IRS,
we inform you that any U.S. tax advice contained in this communication (or in any
attachment) is not intended or written to be used, and cannot be used, for the
purpose of (i) avoiding penalties under the Internal Revenue Code or (ii)
promoting, marketing or recommending to another party any transaction or matter

addressed in this communication (or in any attachment).

This email and any files transmitted with it may contain privileged or otherwise confidential information. If you are not the intended recipient, or believe that you may have received this communication in error, please advise the sender via reply email and delete the email you received.

EXHIBIT F

Well Number	State Well No.	USGS site_id	Reference Point Elevation
4 - FOX	08N/13W-36N01S	344405118000101	2337.5
4 - 5	07N/12W-22B02S	344120118081301	2374.9
4 - 15	07N/12W-11M02S	Not in Database	2339.0
4 - 22	07N/13W-24M02S	344044118125701	2372.0
4 - 25	07N/12W-21C04S	344109118092601	2357.3
4 - 26	07N/12W-15R04S	344125118075801	2382.5
4 - 27	07N/13W-24M03S	Not in Database	2373.0
4 - 29	07N/12W-34N03S	343848118083801	2521.0
4 - 30	07N/12W-34N02S	Not in Database	2514.7
4 - 32	07N/12W-27P02S	343943118081801	2463.5
4 - 33	07N/12W-27H03S	344008118074701	2441.0
4 - 34	07N/12W-27P03S	343943118082101	2464.7
4 - 36	07N/12W-09E01S	344241118094001	2316.0
4 - 37	07N/12W-30B01S	Not in Database	2386.0
4 - 38	07N/12W-21C05S	Not in Database	2356.0
4 - 39	08N/11W-30Q03S	Not in Database	2312.0
4 - 41	07N/10W-19R02S	Not in Database	2435.0
4 - 42	07N/12W-27J06S	344003118074901	2462.0
4 - 43	07N/12W-27F02S	344005118081801	2445.0
4 - 44	07N/12W-27F03S	344006118082601	2450.0
4 - 50	07N/12W-09A01S	Not in Database	2311.0
4 - 51	07N/12W-09B01S	Not in Database	2311.0
4 - 54	07N/11W-20G01S	344058118035501	2415.0
4 - 55	07N/11W-20G02S	Not in Database	2415.0
4 - 58	07N/11W-18R01S	Not in Database	2395.0
4 - 59	07N/11W-18R02S	Not in Database	2395.0
4 - 60	07N/12W-17F02 S	344151118103501	2338.0
4 - 61	07N/12W-21C006S	Not in Database	2358.0
4 - 62	07N/12W-15H001S	Not in Database	2365.0
4 - 63	07N/12W-27H009S	Not in Database	2440.0
4 - 64	07N/12W-21H010S	Not in Database	2440.0
4 - 65	08N/11W-30Q004S	Not in Database	2310.0
4 - 66	07N/12W-34N006S	Not in Database	2520.0
4 - 67	07N/12W-11E003S	344248118074701	2340.0
4 - 68	07N/12W-17F003S	Not in Database	2320.0
4 - 69	07N/12W-34N007S	Not in Database	2520.0
4 - 72	07N/12W-27F011S	344004118082401	2440.0
24 - 4	05N/10W-10E02S	343213117551801	2836.0
24 - 5			2840.0
27 - 2	05N/10W-07P01S	343143117580901	2871.0
27 - 3	05N/10W-07R01S	343144117572901	2893.0
27 - 4	05N/10W-05R01 S	343236117562401	2802.0
27 - 5			2870.0
34 - 6	06N/12W-15H01S	Not in Database	2620.0
35 - 2			2410.0
38 - 1	06N/09W-10D01S	Not in Database	2640.0
38 - 3	06N/09W-10Q03S	343713117484701	2622.0
39 - 1	05N/09W-31R01S	342824117512501	3431.0

Kimberly Huangfu - RE: Antelope Valley Groundwater -- UTM Coordinates

From: Kimberly Huangfu
To: Roberts, Daniel
Date: 9/18/2008 11:43 AM
Subject: RE: Antelope Valley Groundwater -- UTM Coordinates
CC: Dunn, Jeffrey; Garner, Eric; Hedlund, Stefanie; McKeith, Malissa; Salazar, Joseph
Attachments: LACWW Waterwells Needing Coordinates_1.pdf

Thanks, Dan. Attached please a table of the well IDS and USGS IDS that we were able to identify from your spreadsheet. Unfortunately, 25 of 48 wells cannot be located with any precision because they are not included in the database.

Please send us the UTM coordinates for all 48 wells referenced in the attached pdf, along with the state well ID (which should reference township, range, section and subsection locations) for Wells 24-5, 27-5, and 35-2.

Thanks,
 Kimberly

>>>

From: "Daniel Roberts" <Daniel.Roberts@bbklaw.com>
To: "Kimberly Huangfu" <huangfu@lbbslaw.com>
CC: "Jeffrey Dunn" <jeffrey.dunn@BBKLAW.COM>, "Eric Garner" <Eric.Garner@bbklaw.com>, "Stefanie Hedlund" <Stefanie.Hedlund@bbklaw.com>
Date: 9/18/2008 10:43 AM
Subject: RE: Antelope Valley Groundwater -- spreadsheet

Here you go.

24-5: state code 1910203-014

27-5: state code 1910203-019

35-2: state code 1910027-002

From: Kimberly Huangfu [mailto:huangfu@lbbslaw.com]
Sent: Wednesday, September 17, 2008 5:22 PM
To: Daniel Roberts
Subject: RE: Antelope Valley Groundwater -- spreadsheet

Dan,

We also need the state well identification numbers for the following three wells:

24 - 5

27 - 5

35 - 2

Thanks,
Kim

KIMBERLY HUANGFU

LEWIS BRISBOIS BISGAARD & SMITH LLP

221 N. Figueroa Street, Suite 1200, Los Angeles, CA 90012

direct 213.580.3907 | tel 213.250.1800 | fax 213.250.7900

huangfu@lbbslaw.com | <http://www.lbbslaw.com>

This communication constitutes an electronic communication within the meaning of the Electronic Communications Privacy Act, 18 USC 2510, and its disclosure is strictly limited to the recipient intended by the sender of this message. This communication may contain confidential and privileged material for the sole use of the intended recipient and receipt by anyone other than the intended recipient does not constitute a loss of the confidential or privileged nature of the communication. Any review or distribution by others is strictly prohibited. If you are not the intended recipient please contact the sender by return electronic mail and delete all copies of this communication. For more information about Lewis Brisbois Bisgaard & Smith, visit us at <http://www.lbbslaw.com>.

>>>

From: "Daniel Roberts" <Daniel.Roberts@bbklaw.com>
To: "Kimberly Huangfu" <huangfu@lbbslaw.com>
CC: "Eric Garner" <Eric.Garner@bbklaw.com>, "Jeffrey Dunn" <jeffrey.dunn@BBKLAW.COM>, "Stefanie Hedlund" <Stefanie.Hedlund@bbklaw.com>, "Joseph Salazar" <jsalazar@lbbslaw.com>, "Malissa McKeith" <MCKEITH@lbbslaw.com>
Date: 9/17/2008 9:08 AM
Subject: RE: Antelope Valley Groundwater -- spreadsheet

(1) We have provided you with the document as it is kept by the District. Unfortunately, the "total" column has a typo in the year marker for some of the years, but that is how the document exists. We

are not going to modify the document, nor are we going to create a new document. We have provided the information you requested in the form in which it exists.

(2) My understanding is that the July and August 2008 raw data have been collected in the field, but that information has not yet been processed, as there is a lag in processing such items, particularly in the high-demand summer months. No, that data will not be available by the close of business today. We have provided on this spreadsheet data the most-recent data that is available, which covers the last 18 1/2 years (222 months). We will provide the later data once it is available.

-----Original Message-----

From: Kimberly Huangfu [mailto:huangfu@lbbslaw.com]

Sent: Tuesday, September 16, 2008 10:12 PM

To: Daniel Roberts

Cc: Eric Garner; Jeffrey Dunn; Stefanie Hedlund; Joseph Salazar; Malissa McKeith

Subject: RE: Antelope Valley Groundwater -- spreadsheet

While I understand that you are unable to alter the document, we need a comprehensive spreadsheet with proper labeling. Though the individual tabs at the bottom of the screen are correctly labeled, when one goes to print the individual spreadsheets, the tabs are not printed and therefore not accurately reflected in the printout.

As for the July and August 2008 meter readings, this data should be readily available since meter readings are routinely collected at the end of each month. As such, your client should be able to access this data with relative ease. Let me know if you are unable to obtain the July and August 2008 meter readings by the close of business on Wednesday. If this is the case, we will have to go to the Judge and explain our situation.

Thanks,
Kimberly

>>> "Daniel Roberts" <Daniel.Roberts@bbklaw.com> 09/16/08 4:26 PM >>>
I noticed that typo in the later sheets as well, but the tabs for those years clearly identify which year is referenced, and the document says what it says; I can't alter the document.

As far as your other questions you asked by telephone earlier today, I am still waiting on an answer re the July and August data -- I know it's not available now, but I'm not sure yet how soon we can get it to you. As for the maps, all the District's maps are printed with that disclaimer, so we have no maps to produce to you without that disclaimer on them.

-Dan

From: Kimberly Huangfu [mailto:huangfu@lbbslaw.com]

Sent: Tuesday, September 16, 2008 12:26 PM

To: Daniel Roberts

Cc: Eric Garner; Jeffrey Dunn; Stefanie Hedlund; Joseph Salazar; Malissa McKeith

Subject: Fwd: Antelope Valley Groundwater -- spreadsheet

Thanks, Dan. Years 2002-2008 are still mislabeled as 2001. Can you please correct those cells and email the revised spreadsheet back to me?

KIMBERLY HUANGFU

LEWIS BRISBOIS BISGAARD & SMITH LLP

221 N. Figueroa Street, Suite 1200, Los Angeles, CA 90012

direct 213.580.3907 | tel 213.250.1800 | fax 213.250.7900

huangfu@lbbslaw.com <mailto:huangfu@lbbslaw.com> |
<http://www.lbbslaw.com> <<http://www.lbbslaw.com/>>

This communication constitutes an electronic communication within the meaning of the

Electronic Communications Privacy Act, 18 USC 2510, and its disclosure is strictly limited

to the recipient intended by the sender of this message. This communication may contain

confidential and privileged material for the sole use of the intended recipient and receipt

by anyone other than the intended recipient does not constitute a loss of the confidential

or privileged nature of the communication. Any review or distribution by others is strictly

prohibited. If you are not the intended recipient please contact the sender by return

electronic mail and delete all copies of this communication. For more information about

Lewis Brisbois Bisgaard & Smith, visit us at <http://www.lbbslaw.com>

<<http://www.lbbsslaw.com/>> .

>>>

From:

"Daniel Roberts" <Daniel.Roberts@bbklaw.com>

To:

"Kimberly Huangfu" <huangfu@lbbsslaw.com>

CC:

"Jeffrey Dunn" <jeffrey.dunn@BBKLAW.COM>, "Eric Garner"
<Eric.Garner@bbklaw.com>, "Stefanie Hedlund"
<Stefanie.Hedlund@bbklaw.com>

Date:

9/16/2008 12:17 PM

Subject:

Antelope Valley Groundwater -- spreadsheet

As we discussed, please find attached the electronic version of the spreadsheet. I will ask about the other two items you mentioned and get back to you as soon as I can.

Daniel S. Roberts for
Best Best & Krieger LLP
Daniel.Roberts@bbklaw.com

IRS CIRCULAR 230 NOTICE: To ensure compliance with requirements imposed by the IRS, we inform you that any U.S. tax advice contained in this communication (or in any attachment) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed in this communication (or in any attachment).

This email and any files transmitted with it may contain privileged or otherwise confidential information. If you are not the intended recipient,

or believe that you may have received this communication in error,
please advise the sender via reply email and delete the email you
received.

IRS CIRCULAR 230 NOTICE: To ensure compliance with requirements imposed
by the IRS,
we inform you that any U.S. tax advice contained in this communication
(or in any
attachment) is not intended or written to be used, and cannot be used,
for the
purpose of (i) avoiding penalties under the Internal Revenue Code or
(ii)
promoting, marketing or recommending to another party any transaction or
matter
addressed in this communication (or in any attachment).

This email and any files transmitted with it may contain privileged or
otherwise confidential information. If you are not the intended
recipient,
or believe that you may have received this communication in error,
please advise the sender via reply email and delete the email you
received.

IRS CIRCULAR 230 NOTICE: To ensure compliance with requirements imposed by the IRS,
we inform you that any U.S. tax advice contained in this communication (or in any
attachment) is not intended or written to be used, and cannot be used, for the
purpose of (i) avoiding penalties under the Internal Revenue Code or (ii)
promoting, marketing or recommending to another party any transaction or matter
addressed in this communication (or in any attachment).

This email and any files transmitted with it may contain privileged or
otherwise confidential information. If you are not the intended recipient,
or believe that you may have received this communication in error,
please advise the sender via reply email and delete the email you received.

IRS CIRCULAR 230 NOTICE: To ensure compliance with requirements imposed by the IRS,
we inform you that any U.S. tax advice contained in this communication (or in any
attachment) is not intended or written to be used, and cannot be used, for the
purpose of (i) avoiding penalties under the Internal Revenue Code or (ii)
promoting, marketing or recommending to another party any transaction or matter
addressed in this communication (or in any attachment).

This email and any files transmitted with it may contain privileged or
otherwise confidential information. If you are not the intended recipient,
or believe that you may have received this communication in error,
please advise the sender via reply email and delete the email you received.
