

Attorneys for: Gene T. Bahlman, William Barnes, William R. Barnes & Eldora M. Barnes Family Trust of 1989, Thomas M. Bookman, B.J. Calandri, John Calandri, John Calandri as Trustee of the John and B.J. Calandri 2001 Trust, Son Rise Farms, Calmat Land Company, Sal and Connie L. Cardile, Efren and Luz Chavez, Consolidated Rock Products, Del Sur Ranch LLC, Steven Godde as Trustee of the Forrest G. Godde Trust, Lawrence A. Godde, Lawrence A. Godde and Godde Trust, Robert and Phillip Gorrindo, Gorrindo Family Trust, Laura Griffin, Healy Farms, Healy Enterprises, Inc., John Javadi and Sahara Nursery, Juniper Hills Water Group, Gailen Kyle, Gailen Kyle as Trustee of the Kyle Trust, James W. Kyle, James W. Kyle as Trustee of the Kyle Family Trust, Julia Kyle, Wanda E. Kyle, Maritorena Living Trust, Jose and Marie Maritorena, Richard H. Miner, Barry S. Munz, Terry A. Munz and Kathleen M. Munz, Eugene B. Nebeker, R and M Ranch, Inc., Richard and Michael Nelson, Robert Jones, John and Adrienne Reca, Mabel Selak, Jeffrey L. & Nancee J. Siebert, Dr. Samuel Kremen and Tierra Bonita Ranch Company, Beverly Tobias, Triple M Property FKA and 3M Property Investment Co., Vulcan Materials Co. and Vulcan Lands Inc., Willow Springs Company, Donna Wilson, **collectively known as the Antelope Valley Groundwater Agreement Association (“AGWA”)**

FOR THE COUNTY OF LOS ANGELES

Judicial Council Coordination Proceeding
No. 4408

Santa Clara Case No. 1-05-CV-049053
Assigned to The Honorable Jack Komar

OBJECTION OF AGWA TO NOTICES OF DEPOSITION FILED BY QUARTZ HILL WATER DISTRICT

1 The Antelope Valley Groundwater Agreement Association (“AGWA”) hereby objects to
2 the Notices of Deposition of its members Aleks Baharlow, Gene Bahlman, William Barnes,
3 Thomas Bookman, Vulcan Materials (Robert Bowcock), John Calandri, Billie Dickey, Robert
4 Gorrindo, Jane Healy, John Javadi, Robert Jones, Dr. Samuel Kremen, Julie Kyle, John
5 Maritorena, Richard Miner, Jim Nye, Adrienne Reca, Mabel Selak, Jeffrey Siebert, Michael
6 Smith, and Donna Wilson (collectively, “Noticed Parties”), filed by Quartz Hill Water District
7 March 22, 2013.

8 AGWA objects on the grounds that the Notices of Deposition fail to comply with the
9 Court’s Third Amended Case Management Order, signed by the Court March 7, 2013, directing
10 that any party wishing to take any deposition shall state the area of inquiry with specificity in the
11 notice of deposition. Specifically, the Third Amended Case Management Order requires “...the
12 deposition notice shall specify by declaration item number which topics within the party’s
13 declaration require further testimony by the declarant and the nature of such inquiry.” (Third
14 Amended Case Management Order, at 2:7-8.) The Notices of Depositions filed by Quartz Hill
15 Water District fail to specify which topics within each party’s declaration require further
16 testimony and the nature of inquiry.

17 AGWA also objects to the Notice of Deposition of its designated expert witness Jan
18 Hendrickx and the Noticed Parties on the grounds that the dates noticed for deposition do not
19 conform to those dates for deposition of Dr. Hendrickx and the Noticed Parties agreed-upon
20 between Counsel at the Court ordered meet and confer, which occurred on February 15, 2013.

21 As further grounds, AGWA objects to the Notices of Deposition of Jane Healey, Donna
22 Wilson, and John Maritorena, as AGWA Counsel previously notified Counsel for Quartz Hill
23 Water District that Ms. Healey, Ms. Wilson and Mr. Maritorena cannot travel to Los Angeles due
24 to medical conditions, yet Counsel nevertheless noticed the depositions of these three parties for
25 Los Angeles. AGWA will seek a protective order if Counsel insists upon forcing these member
26 to travel despite their conditions.

1 Dated: March 22, 2013

BROWNSTEIN HYATT FARBER SCHRECK, LLP



3 By: _____

4 MICHAEL T. FIFE
5 BRADLEY J. HERREMA
6 ATTORNEYS FOR AGWA

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PROOF OF SERVICE

**STATE OF CALIFORNIA,
COUNTY OF SANTA BARBARA**

I am employed in the County of Santa Barbara, State of California. I am over the age of 18 and not a party to the within action; my business address is: 21 E. Carrillo Street, Santa Barbara, California 93101.

On March 22, 2013, I served the foregoing document described as:

**OBJECTION OF AGWA TO NOTICES OF DEPOSITION FILED BY QUARTZ
HILL WATER DISTRICT**

on the interested parties in this action.

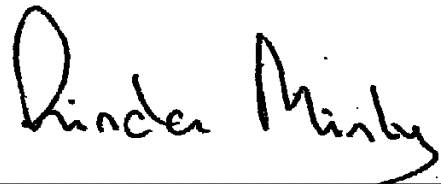
By posting it on the website by 6:00 p.m. on March 22, 2013.

This posting was reported as complete and without error.

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

Executed in Santa Barbara, California, on March 22, 2013.

**LINDA MINKY
TYPE OR PRINT NAME**



SIGNATURE