

1 **BEST BEST & KRIEGER LLP**

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7 TELEPHONE: (949) 263-2600

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9 Attorneys for Cross-Complainant

10 LOS ANGELES COUNTY WATERWORKS

11 DISTRICT NO. 40

12 **OFFICE OF COUNTY COUNSEL**

13 **COUNTY OF LOS ANGELES**

14 JOHN F. KRATTLI, Bar No. 82149

15 COUNTY COUNSEL

16 WARREN WELLEN, Bar No. 139152

17 PRINCIPAL DEPUTY COUNTY COUNSEL

18 500 WEST TEMPLE STREET

19 LOS ANGELES, CALIFORNIA 90012

20 TELEPHONE: (213) 974-8407

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22 Attorneys for Cross-Complainant LOS ANGELES

23 COUNTY WATERWORKS DISTRICT NO. 40

24 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

25 **COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

26 **ANTELOPE VALLEY**
27 **GROUNDWATER CASES**

28 **Included Actions:**

Los Angeles County Waterworks District
No. 40 v. Diamond Farming Co., Superior
Court of California, County of Los
Angeles, Case No. BC 325201;

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

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

Judicial Council Coordination No. 4408

CLASS ACTION

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

**NOTICE OF WITHDRAWAL OF
DEPOSITION OF PERSON MOST
KNOWLEDGEABLE FOR ROSAMOND
COMMUNITY SERVICES DISTRICT**


1 TO ALL PARTIES AND ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that Los Angeles County Waterworks District No. 40, by and
3 through its counsel of record, Best Best & Krieger LLP, hereby withdraws its Notice of
4 Deposition of Person Most Knowledgeable for Rosamond Community Services District. A true
5 and accurate copy of said deposition notice is attached hereto as Exhibit 'A.'

6 Dated: February 21, 2012

BEST BEST & KRIEGER LLP

7 By

8 
9 ERIC L. GARNER
10 JEFFREY V. DUNN
11 STEFANIE D. HEDLUND
12 Attorneys for Cross-Complainant
13 LOS ANGELES COUNTY
14 WATERWORKS DISTRICT NO. 40

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EXHIBIT A

BEST BEST & KRIEGER LLP
ERIC L. GARNER, Bar No. 130665
JEFFREY V. DUNN, Bar No. 131926
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Attorneys for Cross-Complainant
LOS ANGELES COUNTY WATERWORKS
DISTRICT NO. 40

EXEMPT FROM FILING FEES
UNDER GOVERNMENT CODE
SECTION 6103

OFFICE OF COUNTY COUNSEL
COUNTY OF LOS ANGELES
ANDREA ORDIN, Bar No. 38235
COUNTY COUNSEL
WARREN WELLEN, Bar No. 139152
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Attorneys for Cross-Complainant LOS ANGELES
COUNTY WATERWORKS DISTRICT NO. 40

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES – CENTRAL DISTRICT

**ANTELOPE VALLEY
GROUNDWATER CASES**

Included Actions:

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RIC 353 840, RIC 344 436, RIC 344 668

Judicial Council Coordination No. 4408

CLASS ACTION

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

**DEPOSITION OF PERSON MOST
KNOWLEDGEABLE FOR ROSAMOND
COMMUNITY SERVICES DISTRICT**

[C.C.P. §§ 2025.220(a)(5), 2034.470]

Date: March 20, 2012
Time: 1:00 p.m.
Location: 5 Park Plaza, Suite 1500
Irvine, California 92614

1 TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on March 20, 2012, at 1:00 p.m., Los Angeles County
3 Waterworks District No. 40 will take the oral deposition of Rosamond Community Services
4 District at the law offices of Best Best & Krieger, 5 Park Plaza, Suite 1500, Irvine, CA 92614.
5 The deposition will be taken before a deposition officer who is authorized to administer oaths.
6 Said deposition will be recorded by stenographic method, and may also be recorded by videotape.
7 The deposition will continue day to day until completed, excluding weekends and holidays.
8 The deponent is not a natural person, and therefore shall produce at the deposition those of its
9 officers, directors, agents or employees who are the most qualified to testify on its behalf
10 concerning the following subject:

11 1. Groundwater pumping for Rosamond Community Services District and
12 groundwater pumping for properties to be annexed into Rosamond Community Services' service
13 area.

14 PLEASE TAKE FURTHER NOTICE that the deponent is required to produce at the
15 deposition the DOCUMENTS described in the attached Request For Production.

16 Dated: February 17, 2012

BEST BEST & KRIEGER LLP

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By Stefanie Hedlund
ERIC L. GARNER
JEFFREY V. DUNN
STEFANIE D. HEDLUND
Attorneys for Cross-Complainant
LOS ANGELES COUNTY
WATERWORKS DISTRICT NO. 40

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DOCUMENTS TO BE PRODUCED

1. Produce all groundwater pump meter records for groundwater pumped in the BASIN since 1951 from real property YOU own in the BASIN.

2. All meter records for groundwater used in the BASIN since 1951 from real property YOU own in the BASIN.

3. All meter records for water used in the BASIN since 1951 from real property YOU own in the BASIN.

4. All electrical meter records which indicate how much groundwater has been pumped in the BASIN since 1951 from real property YOU own in the basin.

5. All diesel records for groundwater pumped in the BASIN since 1951 from real property YOU own.

6. All DOCUMENTS which indicate the amount of groundwater pumped since 1951 from real property YOU own in the BASIN.

7. All DOCUMENTS which relate to YOUR calculation of the amount of groundwater pumped or used by YOU or YOUR predecessors in the BASIN since 1951 from real property YOU own in the BASIN.

8. All First and Annual Notices for Groundwater Extraction YOU have filed with the California State Water Reassurances Control Board for all groundwater pumped in the BASIN since 1951.

9. All First and Annual Notices for Groundwater Extraction YOU have filed with Los Angeles County for all groundwater pumped in the BASIN since 1951.

10. All First and Annual Notices for Groundwater Extraction that relate to any real property YOU own in the BASIN.

11. All DOCUMENTS that indicate how much groundwater any party to this litigation has pumped in the BASIN since 1951.

12. All DOCUMENTS that indicate how much groundwater is pumped on property YOU plain to annex into YOUR service area.

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PROOF OF SERVICE

I, Patricia Alshabazz, declare:

I am a resident of the State of California and over the age of eighteen years, and not a party to the within action; my business address is Best Best & Krieger LLP, 500 Capitol Mall, Suite 1700, Sacramento, California 95814. On February 17, 2012, I served the within document(s):

**DEPOSITION OF PERSON MOST KNOWLEDGEABLE
FOR ROSAMOND COMMUNITY SERVICES DISTRICT**

- ☒ by posting the document(s) listed above to the Santa Clara County Superior Court website in regard to the Antelope Valley Groundwater matter.
- ☐ by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Sacramento, California addressed as set forth below.
- ☐ by causing personal delivery by ASAP Corporate Services of the document(s) listed above to the person(s) at the address(es) set forth below.
- ☐ by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.
- ☐ I caused such envelope to be delivered via overnight delivery addressed as indicated on the attached service list. Such envelope was deposited for delivery by Federal Express following the firm's ordinary business practices.

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

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

Executed on February 17, 2012, at Sacramento, California.



Patricia Alshabazz

PROOF OF SERVICE

I, Patricia Alshabazz, declare:

I am a resident of the State of California and over the age of eighteen years, and not a party to the within action; my business address is Best Best & Krieger LLP, 500 Capitol Mall, Suite 1700, Sacramento, California 95814. On February 21, 2012, I served the within document(s):

**NOTICE OF WITHDRAWAL OF DEPOSITION OF
PERSON MOST KNOWLEDGEABLE FOR ROSAMOND
COMMUNITY SERVICES DISTRICT**



by posting the document(s) listed above to the Santa Clara County Superior Court website in regard to the Antelope Valley Groundwater matter.



by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Sacramento, California addressed as set forth below.



by causing personal delivery by ASAP Corporate Services of the document(s) listed above to the person(s) at the address(es) set forth below.



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Executed on February 21, 2012, at Sacramento, California.



Patricia Alshabazz