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COUNTY WATERWORKS DISTRICT NO. 40

**EXEMPT FROM FILING FEES
UNDER GOVERNMENT CODE
SECTION 6103**

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES – CENTRAL DISTRICT

**ANTELOPE VALLEY
GROUNDWATER CASES**

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

**LOS ANGELES COUNTY
WATERWORKS DISTRICT NO. 40'S
RESPONSES TO BOLTHOUSE
PROPERTIES, LLC'S SPECIAL
INTERROGATORIES, SET ONE**

ORANGE\SHEDLUND\39522.1

PROPOUNDING PARTY: Bolthouse Properties, LLC

RESPONDING PARTY: Los Angeles County Waterworks District No. 40

SET NUMBER: One (1)

RESPONSE TO SPECIAL INTERROGATORY NO. 1:

Objection. The request is premature, burdensome and oppressive. This request seeks information concerning defendant class members and the court has not yet completed its defendant class certification process.

RESPONSE TO SPECIAL INTERROGATORY NO. 2:

Objection. The request is premature, burdensome and oppressive. This request seeks information concerning defendant class members and the court has not yet completed its defendant class certification process.

RESPONSE TO SPECIAL INTERROGATORY NO. 3:

Objection. The request is premature, burdensome and oppressive. This request seeks information concerning defendant class members and the court has not yet completed its defendant class certification process.

RESPONSE TO SPECIAL INTERROGATORY NO. 4:

Objection. The request is premature, burdensome and oppressive. This request seeks information concerning defendant class members and the court has not yet completed its defendant class certification process.

RESPONSE TO SPECIAL INTERROGATORY NO. 5:

Objection. The request is premature, burdensome and oppressive. This request seeks information concerning defendant class members and the court has not yet completed its defendant class certification process.

RESPONSE TO SPECIAL INTERROGATORY NO. 6:

Objection. The request is premature, burdensome and oppressive. This request seeks information concerning defendant class members and the court has not yet completed its defendant class certification process.

RESPONSE TO SPECIAL INTERROGATORY NO. 7:

Objection. The request is premature, burdensome and oppressive. This request seeks information concerning defendant class members and the court has not yet completed its defendant class certification process.

RESPONSE TO SPECIAL INTERROGATORY NO. 8:

Objection. The request is premature, burdensome and oppressive. This request seeks information concerning defendant class members and the court has not yet completed its defendant class certification process.

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RESPONSE TO SPECIAL INTERROGATORY NO. 9:

Objection. The request is premature, burdensome and oppressive. This request seeks information concerning defendant class members and the court has not yet completed its defendant class certification process.

Dated: September 14, 2007

BEST BEST & KRIEGER LLP

By 

ERIC L. GARNER
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STEFANIE D. HEDLUND
Attorneys for Cross-Complainants
ROSAMOND COMMUNITY SERVICES
DISTRICT and LOS ANGELES
COUNTY WATERWORKS DISTRICT
NO. 40

PROOF OF SERVICE

I, Kerry V. Keefe, 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, 5 Park Plaza, Suite 1500, Irvine, California 92614. On September 14, 2007, I served the within document(s):

LOS ANGELES COUNTY WATERWORKS DISTRICT NO. 40'S OBJECTIONS TO BOLTHOUSE PROPERTIES, LLC'S SPECIAL INTERROGATORIES, SET ONE



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 Irvine, 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 September 14, 2007, at Irvine, California.


Kerry V. Keefe