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WATERWORKS DISTRICT NO. 40

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8 COUNTY OF LOS ANGELES

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13 COUNTY WATERWORKS DISTRICT NO. 40

14  
15 SUPERIOR COURT OF THE STATE OF CALIFORNIA

16 COUNTY OF LOS ANGELES – CENTRAL DISTRICT

17  
18 **ANTELOPE VALLEY**  
19 **GROUNDWATER CASES**

Included Actions:

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

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

28 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**  
**OBJECTIONS TO BOLTHOUSE**  
**PROPERTIES, LLC'S REQUESTS FOR**  
**ADMISSIONS, SET ONE**

ORANGE\SHEDLUND\39526.1

PROPOUNDING PARTY: Bolthouse Properties, LLC

RESPONDING PARTY: Los Angeles County Waterworks District No. 40

SET NUMBER: One (1)

OBJECTION TO REQUEST NO. 1:

Objection. This request is not reasonably calculated to lead to the discovery of admissible evidence. The request is irrelevant and calculated to harass.

OBJECTION TO REQUEST NO. 2:

Los Angeles County Waterworks District No. 40 admits that it is a public entity.

OBJECTION TO REQUEST 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.

OBJECTION TO REQUEST 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.

OBJECTION TO REQUEST 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.

OBJECTION TO REQUEST NO. 6:

Objection. The request is premature, burdensome and oppressive. This request seeks

1 information concerning defendant class members and the court has not yet completed its  
2 defendant class certification process.

3  
4 OBJECTION TO REQUEST NO. 7:

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

8  
9 OBJECTION TO REQUEST NO. 8:

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

13  
14 OBJECTION TO REQUEST NO. 9:

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

18  
19 OBJECTION TO REQUEST NO. 10:

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

23  
24 OBJECTION TO REQUEST NO. 11:

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

OBJECTION TO REQUEST NO. 12:

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.

OBJECTION TO REQUEST NO. 13:

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OBJECTION TO REQUEST NO. 14:

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OBJECTION TO REQUEST NO. 15:

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OBJECTION TO REQUEST NO. 16:

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OBJECTION TO REQUEST NO. 17:

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.

OBJECTION TO REQUEST NO. 18:

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OBJECTION TO REQUEST NO. 19:

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OBJECTION TO REQUEST NO. 20:

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OBJECTION TO REQUEST NO. 21:

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OBJECTION TO REQUEST NO. 22:

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OBJECTION TO REQUEST NO. 23:

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OBJECTION TO REQUEST NO. 24:

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OBJECTION TO REQUEST NO. 25:

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.

OBJECTION TO REQUEST NO. 26:

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OBJECTION TO REQUEST NO. 27:

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OBJECTION TO REQUEST NO. 28:

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.

OBJECTION TO REQUEST NO. 29:

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OBJECTION TO REQUEST NO. 30:

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OBJECTION TO REQUEST NO. 31:

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OBJECTION TO REQUEST NO. 32:

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.

OBJECTION TO REQUEST NO. 33:

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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1 OBJECTION TO REQUEST NO. 34:

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

5  
6 OBJECTION TO REQUEST NO. 35:

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

10  
11 OBJECTION TO REQUEST NO. 36:

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

15  
16 OBJECTION TO REQUEST NO. 37:

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

20  
21 OBJECTION TO REQUEST NO. 38:

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

25  
26 OBJECTION TO REQUEST NO. 39:

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



defendant class certification process.

OBJECTION TO REQUEST NO. 40:

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.

OBJECTION TO REQUEST NO. 41:

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.

OBJECTION TO REQUEST NO. 42:

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.

OBJECTION TO REQUEST NO. 43:

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.

OBJECTION TO REQUEST NO. 44:

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.

OBJECTION TO REQUEST NO. 45:

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.

OBJECTION TO REQUEST NO. 46:

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.

OBJECTION TO REQUEST NO. 47:

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.

OBJECTION TO REQUEST NO. 48:

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.

OBJECTION TO REQUEST NO. 49:

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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1 OBJECTION TO REQUEST NO. 50:

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

5  
6 OBJECTION TO REQUEST NO. 51:

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

10  
11 OBJECTION TO REQUEST NO. 52:

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

15  
16 OBJECTION TO REQUEST NO. 53:

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

20  
21 OBJECTION TO REQUEST NO. 54:

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

25  
26 OBJECTION TO REQUEST NO. 55:

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

defendant class certification process.

OBJECTION TO REQUEST NO. 56:

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.

OBJECTION TO REQUEST NO. 57:

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.

OBJECTION TO REQUEST NO. 58:

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.

OBJECTION TO REQUEST NO. 59:

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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OBJECTION TO REQUEST NO. 60:

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  
JEFFREY V. DUNN  
STEPANIE 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 REQUESTS FOR ADMISSIONS, 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