1 BEST BEST & KRIEGER LLP EXEMPT FROM FILING FEES ERIC L. GARNER, Bar No. 130665 UNDER GOVERNMENT CODE 2 JEFFREY V. DUNN, Bar No. 131926 **SECTION 6103** STEFANIE D. HEDLUND, Bar No. 239787 3 5 PARK PLAZA, SUITE 1500 IRVINE, CALIFORNIA 92614 4 TELEPHONE: (949) 263-2600 TELECOPIER: (949) 260-0972 5 Attorneys for Cross-Complainants ROSAMOND COMMUNITY SERVICES DISTRICT and LOS ANGELES COUNTY 6 WATERWORKS DISTRICT NO. 40 7 OFFICE OF COUNTY COUNSEL 8 COUNTY OF LOS ANGELES RAYMOND G. FORTNER, JR., Bar No. 42230 9 COUNTY COUNSEL FREDERICK W. PFAEFFLE, Bar No. 145742 10 PRINCIPAL DEPUTY COUNTY COUNSEL 500 WEST TEMPLE STREET 11 LOS ANGELES, CALIFORNIA 90012 TELEPHONE: (213) 974-1901 12 TELECOPIER: (213) 458-4020 Attorneys for Cross-Complainant LOS ANGELES COUNTY WATERWORKS DISTRICT NO. 40 13 14 SUPERIOR COURT OF THE STATE OF CALIFORNIA 15 COUNTY OF LOS ANGELES - CENTRAL DISTRICT 16 17 ANTELOPE VALLEY Judicial Council Coordination No. 4408 18 **GROUNDWATER CASES CLASS ACTION** 19 Included Actions: Los Angeles County Waterworks District Santa Clara Case No. 1-05-CV-049053 20 No. 40 v. Diamond Farming Co., Superior Assigned to The Honorable Jack Komar Court of California, County of Los 21 Angeles, Case No. BC 325201; 22 Los Angeles County Waterworks District ROSAMOND COMMUNITY SERVICES No. 40 v. Diamond Farming Co., Superior DISTRICT'S OBJECTIONS TO 23 Court of California, County of Kern, Case **BOLTHOUSE PROPERTIES, LLC'S** No. S-1500-CV-254-348; 24 REQUESTS FOR ADMISSIONS, SET ONE Wm. Bolthouse Farms, Inc. v. City of 25 Lancaster, Diamond Farming Co. v. City of Lancaster, Diamond Farming Co. v. 26 Palmdale Water Dist., Superior Court of California, County of Riverside, Case Nos. 27 RIC 353 840, RIC 344 436, RIC 344 668 28 ORANGE\SHEDLUND\39525. 1

ROSAMOND COMMUNITY SERVICES DISTRICT'S OBJECTIONS TO REQUESTS FOR ADMISSIONS, SET ONE

1 PROPOUNDING PARTY: Bolthouse Properties, LLC 2 RESPONDING PARTY: Rosamond Community Services District SET NUMBER: 3 One (1) 4 5 **OBJECTION TO REOUEST NO. 1:** Objection. This request is not reasonably calculated to lead to the discovery of admissible 6 evidence The request is manifestly irrelevant and calculated to harass. 7 8 **OBJECTION TO REQUEST NO. 2:** 9 Rosamond Community Services District admits that it is a public entity. 10 11 **OBJECTION TO REQUEST NO. 3:** 12 Objection. The request is premature, burdensome and oppressive. This request seeks 13 information concerning defendant class members and the court has not yet completed its 14 defendant class certification process. 15 16 **OBJECTION TO REQUEST NO. 4:** 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. 5:** 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. 6:** 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. 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.

#### **OBJECTION TO REQUEST 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.

#### OBJECTION TO REQUEST 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.

#### **OBJECTION TO REQUEST NO. 10:**

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. No defendant class representative has yet been approved by the court.

#### **OBJECTION TO REQUEST NO. 11:**

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.

ORANGE/SHEDLUND/39525. 1 3

#### **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:**

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. 14:**

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. 15:**

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. 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 ORANGE/SHEDLUND/39525. 1

defendant class certification process.

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# **OBJECTION TO REQUEST NO. 18:**

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. 19:**

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#### **OBJECTION TO REQUEST NO. 20:**

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certification process.

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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:**

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. 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 ORANGE/SHEDLUND/39525. I

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defendant class certification process. 1 2 3 **OBJECTION TO REQUEST NO. 29:** 4 Objection. The request is premature, burdensome and oppressive. This request seeks information 5 concerning defendant class members and the court has not yet completed its defendant class 6 certification process. 7 8 **OBJECTION TO REQUEST NO. 30:** Objection. The request is premature, burdensome and oppressive. This request seeks information concerning defendant class members and the court has not yet completed its 10 11 defendant class certification process. 12 13 **OBJECTION TO REQUEST NO. 31:** 14 Objection. The request is premature, burdensome and oppressive. This request seeks 15 information concerning defendant class members and the court has not yet completed its defendant class certification process. 16 17 18 **OBJECTION TO REQUEST NO. 32:** 19 Objection. The request is premature, burdensome and oppressive. This request seeks 20 information concerning defendant class members and the court has not yet completed its 21 defendant class certification process. 22 23 **OBJECTION TO REQUEST NO. 33:** 24 Objection. The request is premature, burdensome and oppressive. This request seeks 25 information concerning defendant class members and the court has not yet completed its 26 defendant class certification process. 27

#### **OBJECTION TO REQUEST NO. 34:**

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#### **OBJECTION TO REQUEST NO. 38:**

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#### **OBJECTION TO REQUEST NO. 39:**

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#### **OBJECTION TO REQUEST NO. 41:**

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#### OBJECTION TO REQUEST NO. 42:

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#### **OBJECTION TO REQUEST NO. 43:**

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#### **OBJECTION TO REQUEST NO. 44:**

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#### **OBJECTION TO REQUEST NO. 46:**

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#### **OBJECTION TO REQUEST NO. 47:**

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#### **OBJECTION TO REQUEST NO. 48:**

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#### **OBJECTION TO REQUEST NO. 49:**

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#### **OBJECTION TO REQUEST NO. 50:**

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#### OBJECTION TO REQUEST NO. 51:

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#### **OBJECTION TO REQUEST NO. 52:**

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#### **OBJECTION TO REQUEST NO. 53:**

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#### **OBJECTION TO REQUEST NO. 54:**

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#### **OBJECTION TO REQUEST NO. 55:**

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#### **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.

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#### **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.

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#### **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.

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#### **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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# LAW OFFICES OF BEST BEST & KRIEGER LLP 5 PARK PLAZA, SUTE 1500 IRVINE, CALIFORNIA 92614

#### **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

NO. 40

By

ERIC L. GARNER

JEFFREY V. DUNN

STEFANIE D. HEDLUND

Attorneys for Cross-Complainants

ROSAMOND COMMUNITY SERVICES

DISTRICT and LOS ANGELES

COUNTY WATERWORKS DISTRICT

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# LAW OFFICES OF BESTBEST & KRIEGER LLP 5 PARK PLAZA, SUITE I 500 IRWNE, CALIFORNIA 926I 4

#### 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):

### ROSAMOND COMMUNITY SERVICES DISTRICT'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.
Service on that am aware that	I am readily familiar with the firm's practice of collection and processing e for mailing. Under that practice it would be deposited with the U.S. Postal same day with postage thereon fully prepaid in the ordinary course of business. I on motion of the party served, service is presumed invalid if postal cancellation emeter date is more than one day after date of deposit for mailing in affidavit.
above is true an	I declare under penalty of perjury under the laws of the State of California that the nd correct.
	Executed on September 14, 2007, at Irvine, California.
	Kerry Keefe

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