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LOS ANGELES COUNTY WATERWORKS  
6 DISTRICT NO. 40

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

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13 COUNTY WATERWORKS DISTRICT NO. 40

14 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
15 COUNTY OF LOS ANGELES  
16

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

19 Included Actions:  
Los Angeles County Waterworks District  
20 No. 40 v. Diamond Farming Co., Superior  
Court of California, County of Los  
21 Angeles, Case No. BC 325201;

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

24 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

Judicial Council Coordination No. 4408

CLASS ACTION

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

OBJECTIONS TO TEJON RANCHCORP  
AND GRANITE CONSTRUCTION'S  
NOTICE TO APPEAR AND PRODUCE  
DOCUMENTS AND SUPPLEMENTAL  
NOTICE TO APPEAR AND PRODUCE  
DOCUMENTS

1 TO THE COURT AND TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:  
2 Cross-Complainant LOS ANGELES COUNTY WATERWORKS DISTRICT NO. 40  
3 ("District No. 40") objects to Tejon Ranchcorp and Granite Construction's Notice to Appear and  
4 Produce Documents at Trial and Supplemental Notice to Appeal and Produce Documents at Trial,  
5 on the grounds as stated below.

6 **OBJECTIONS NOTICE TO APPEAR AND PRODUCE DOCUMENTS AT TRIAL**  
7 **REQUEST NO. 1:**

8 All DOCUMENTS constituting the DISTRICT's records evidencing the amount of  
9 groundwater pumped by the DISTRICT since January 1, 2000.

10 **RESPONSE TO REQUEST NO. 1:**

11 This request is overbroad, oppressive, burdensome, vague and ambiguous. This request  
12 also seeks irrelevant information and documents that exceed the scope of the Phase 4 trial.  
13 District No. 40 further objects to this request to the extent it seeks information prepared for or in  
14 anticipation of litigation, and/or protected by the attorney-client and/or attorney work-product  
15 privileges. Moreover, District No. 40 has responded to and produced documents in accordance  
16 with the Discovery Order for Phase 4 Trial and submitted Declaration of Adam Ariki, which  
17 include information this request is seeking.

18 **REQUEST NO. 2:**

19 All NOTICES filed with the SWRCB since January 1, 2000.

20 **RESPONSE TO REQUEST NO. 2:**

21 This request is overbroad, oppressive, burdensome, vague and ambiguous. This request  
22 also seeks irrelevant information and documents that exceed the scope of the Phase 4 trial.

23 **REQUEST NO. 3:**

24 All DOCUMENTS evidencing the DISTRICT's correspondence with the SWRCB relating  
25 to groundwater extraction from January 1, 2000 to the present.

26 **RESPONSE TO REQUEST NO. 3:**

27 This request is overbroad, oppressive, burdensome, vague and ambiguous. This request  
28 also seeks irrelevant information and documents that exceed the scope of the Phase 4 trial.

District No. 40 further objects to this request to the extent it seeks information prepared for or in anticipation of litigation, and/or protected by the attorney-client and/or attorney work-product privileges. Moreover, District No. 40 has responded to the Discovery Order for Phase 4 Trial.

**REQUEST NO. 4:**

All check ledgers and cancelled checks evidencing the payment of the filing fees associated with filing the NOTICES since January 1, 2000.

**RESPONSE TO REQUEST NO. 4:**

This request is overbroad, oppressive, burdensome, vague and ambiguous. This request also seeks irrelevant information and documents that exceed the scope of the Phase 4 trial.

**REQUEST NO. 5:**

The DISTRICT's accounts payable ledgers for the period January 1, 2000 through December 31, 2012.

**RESPONSE TO REQUEST NO. 5:**

This request is overbroad, oppressive, burdensome, vague and ambiguous. This request also seeks irrelevant information and documents that exceed the scope of the Phase 4 trial.

**REQUEST NO. 6:**

The DISTRICT's general ledgers for the period January 1, 2000 through December 31, 2012.

**RESPONSE TO REQUEST NO. 6:**

This request is overbroad, oppressive, burdensome, vague and ambiguous. This request also seeks irrelevant information and documents that exceed the scope of the Phase 4 trial.

**REQUEST NO. 7:**

Excel Spreadsheets showing the amount of groundwater pumped by the DISTRICT since 2006.

**RESPONSE TO REQUEST NO. 7:**

This request is overbroad, oppressive, burdensome, vague and ambiguous. This request also seeks irrelevant information and documents that exceed the scope of the Phase 4 trial.

District No. 40 further objects to this request to the extent it seeks information prepared for or in

1 anticipation of litigation, and/or protected by the attorney-client and/or attorney work-product  
2 privileges. Moreover, District No. 40 has responded to and produced documents in accordance  
3 with the Discovery Order for Phase 4 Trial and submitted Declaration of Adam Ariki, which  
4 include information this request is seeking.

5 **REQUEST NO. 8:**

6 Monthly well meter reading for DISTRICT wells from January 1, 2000 through December  
7 31, 2012.

8 **RESPONSE TO REQUEST NO. 8:**

9 This request is overbroad, oppressive, burdensome, vague and ambiguous. This request  
10 also seeks irrelevant information and documents that exceed the scope of the Phase 4 trial.  
11 Moreover, District No. 40 has responded to and produced documents in accordance with the  
12 Discovery Order for Phase 4 Trial and submitted Declaration of Adam Ariki, which include  
13 information this request is seeking.

14 **REQUEST NO. 9:**

15 Annual Southern California Edison pump efficiency test results for years 2000 through  
16 2012.

17 **RESPONSE TO REQUEST NO. 9:**

18 This request is overbroad, oppressive, burdensome, vague and ambiguous. This request  
19 also seeks irrelevant information and documents that exceed the scope of the Phase 4 trial.  
20 Moreover, District No. 40 has responded to and produced documents in accordance with the  
21 Discovery Order for Phase 4 Trial and submitted Declaration of Adam Ariki, which include  
22 information this request is seeking.

23 **REQUEST NO. 10:**

24 Excel Spreadsheets and monthly invoices showing the amount of imported water  
25 purchased by the District.

26 **RESPONSE TO REQUEST NO. 10:**

27 This request is overbroad, oppressive, burdensome, vague and ambiguous. This request  
28 also seeks irrelevant information and documents that exceed the scope of the Phase 4 trial.

District No. 40 further objects to this request to the extent it seeks information prepared for or in anticipation of litigation, and/or protected by the attorney-client and/or attorney work-product privileges. Moreover, District No. 40 has responded to and produced documents in accordance with the Discovery Order for Phase 4 Trial and submitted Declaration of Adam Ariki, which include information this request is seeking.

**REQUEST NO. 11:**

All DOCUMENTS showing how the DISTRICT has accounted for return flows from imported water since 2000, including all budgets, audited financial statements, and audits of the DISTRICT for years 2000 through 2012.

**RESPONSE TO REQUEST NO. 11:**

This request is overbroad, oppressive, burdensome, vague and ambiguous. This request also seeks irrelevant information and documents that exceed the scope of the Phase 4 trial.

**REQUEST NO. 12:**

All DISTRICT water management plans since year 2000.

**RESPONSE TO REQUEST NO. 12:**

This request is overbroad, oppressive, burdensome, vague and ambiguous. This request also seeks irrelevant information and documents that exceed the scope of the Phase 4 trial.

**REQUEST NO. 13:**

All DOCUMENTS, including memorandum, staff reports, resolutions of the DISTRICT'S board, Board meeting minutes and the like showing how the DISTRICT set water rates for years 1990 through current.

**RESPONSE TO REQUEST NO. 13:**

This request is overbroad, oppressive, burdensome, vague and ambiguous. This request also seeks irrelevant information and documents that exceed the scope of the Phase 4 trial.

**OBJECTIONS SUPPLEMENTAL NOTICE TO APPEAR AND PRODUCE**

**DOCUMENTS AT TRIAL**

**REQUEST NO. 13:**

All DOCUMENTS that mention, discuss or refer to groundwater production by TEJON

1 since year 2000.

2 **RESPONSE TO REQUEST NO. 13:**

3 This request is overbroad, oppressive, burdensome, vague and ambiguous. This request  
4 also seeks irrelevant information and documents that exceed the scope of the Phase 4 trial.  
5 District No. 40 further objects to this request to the extent it seeks information prepared for or in  
6 anticipation of litigation, and/or protected by the attorney-client and/or attorney work-product  
7 privileges.

8 **REQUEST NO. 14:**

9 All DOCUMENTS that mention, discuss or refer to groundwater produced on lands  
10 owned by TEJON since year 2000.

11 **RESPONSE TO REQUEST NO. 14:**

12 This request is overbroad, oppressive, burdensome, vague and ambiguous. This request  
13 also seeks irrelevant information and documents that exceed the scope of the Phase 4 trial.  
14 District No. 40 further objects to this request to the extent it seeks information prepared for or in  
15 anticipation of litigation, and/or protected by the attorney-client and/or attorney work-product  
16 privileges.

17 **REQUEST NO. 15:**

18 All DOCUMENTS that mention discuss or refer to the purchase or use of imported water  
19 by TEJON.

20 **RESPONSE TO REQUEST NO. 15:**

21 This request is overbroad, oppressive, burdensome, vague and ambiguous. This request  
22 also seeks irrelevant information and documents that exceed the scope of the Phase 4 trial.  
23 District No. 40 further objects to this request to the extent it seeks information prepared for or in  
24 anticipation of litigation, and/or protected by the attorney-client and/or attorney work-product  
25 privileges.

26 **REQUEST NO. 16:**

27 All DOCUMENTS that mention, discuss or refer to TEJON's water supplies.  
28

1 **RESPONSE TO REQUEST NO. 16:**

2 This request is overbroad, oppressive, burdensome, vague and ambiguous. This request  
3 also seeks irrelevant information and documents that exceed the scope of the Phase 4 trial.  
4 District No. 40 further objects to this request to the extent it seeks information prepared for or in  
5 anticipation of litigation, and/or protected by the attorney-client and/or attorney work-product  
6 privileges.

7  
8  
9 Dated: May 22, 2013

BEST BEST & KRIEGER LLP

11 By Jeffrey V. Dunn/w.w.  
12 ERIC L. GARNER  
13 JEFFREY V. DUNN  
14 STEFANIE D. HEDLUND  
15 Attorneys for Cross-Complainant  
16 LOS ANGELES COUNTY  
17 WATERWORKS DISTRICT NO. 40  
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1 **PROOF OF SERVICE**

2 I, Sandra K. Sandoval, declare:

3 I am a resident of the State of California and over the age of eighteen years, and  
4 not a party to the within action; my business address is Best Best & Krieger LLP, 300 South Grand  
5 Avenue, 25th Floor, Los Angeles, CA 90071. On May 22, 2013, I served the within  
6 document(s):

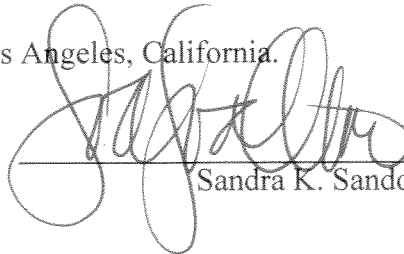
7 **OBJECTIONS TO TEJON RANCHCORP AND GRANITE CONSTRUCTION'S NOTICE  
8 TO APPEAR AND PRODUCE DOCUMENTS AND SUPPLEMENTAL NOTICE TO  
9 APPEAR AND PRODUCE DOCUMENTS**

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

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

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

Executed on May 22, 2013, at Los Angeles, California.



Sandra K. Sandoval