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Attorneys for Cross-Complainant,
ANTELOPE VALLEY-EAST KERN WATER AGENCY

*Exempt from filing fee pursuant to
Gov't. Code Section 6103*

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

Coordination Proceeding
Special Title (Rule 1550(b))

**ANTELOPE VALLEY
GROUNDWATER CASES**

Included Actions:

Los Angeles County Waterworks District
No. 40 vs. Diamond Farming Company, a
corporation, Superior Court of California,
County of Los Angeles, Case No.
BC325201;

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

Wm. Bolthouse Farms, Inc. vs. City of
Lancaster, Diamond Farming Company, a
corporation, vs. City of Lancaster, Diamond
Farming Company, a corporation vs.
Palmdale Water District, Superior Court of
California, County of Riverside, Case Nos.
RIC 353840, RIC 344436, RIC 344668.

Judicial Council Coordination Proceeding
No. 4408

**Santa Clara Case No.
1-05-CV-049053**
The Honorable Jack Komar, Dept.17

**ANTELOPE VALLEY-EAST KERN
WATER AGENCY'S RESPONSES TO
LOS ANGELES COUNTY
WATERWORKS DISTRICT NO. 40'S
SPECIAL INTERROGATORIES, SET
ONE**

Trial Date: February 10, 2014
Time: 9:00 a.m.
Dept.: TBD

1 **PROPOUNDING PARTY:** Los Angeles County Waterworks District No. 40

2 **RESPONDING PARTY:** Antelope Valley-East Kern Water Agency

3 **SET NO:** ONE

4 COMES NOW, the ANTELOPE VALLEY-EAST KERN WATER AGENCY, and
5 hereby responds to the following Special Interrogatories, Set One, as follows:

6 **I.**

7 **PRELIMINARY STATEMENT**

8 A. Responding party has not fully completed investigation of the facts relating to this
9 case, has not fully completed discovery in this action, and has not completed preparation for
10 trial. Without waiving objections stated herein below, all of the responses contained herein are
11 based only upon such facts, information and documents as are presently available to or known
12 to responding parties or within responding party's possession, custody, or control. It is
13 anticipated that further discovery, independent investigation, legal research, and analysis will
14 supply additional facts, add meaning to the known facts, as well as establish new factual
15 conclusions and legal contentions, all of which may lead to additions to, changes in, and
16 variations from the responses herein set forth. The following responses are given without
17 prejudice to responding party's right to offer evidence of any subsequently discovered fact or
18 facts. Responding party accordingly reserves the right to supplement or amend the responses
19 herein as additional facts are ascertained, analyses are made, legal research is completed, and
20 contentions are made. The responses contained herein are made in a good faith effort to supply
21 as much factual information and as much specification of legal contentions as is presently
22 known, but are without prejudice to responding party in relation to further discovery, research
23 and analysis.

24 B. In setting forth these responses, responding party does not waive in whole or in
25 part the attorney-client privilege, work product protection, or any right of privacy or
26 confidentiality provided for by law with respect to any matter whatsoever. In responding to this
27 discovery, responding party will not undertake to provide any information protected by the
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1 attorney-client privilege or work product doctrine. Responding party does not concede the
2 relevance or materiality of the discovery or the subject matter referred to therein.

3 These responses are submitted by responding party subject to, and without waiving in any
4 way or intending to waive, but on the contrary, intending to reserve and reserving:

5 1) All objections pertaining to competency, materiality, privilege and
6 admissibility as evidence for any purpose or any of the documents referred to or responses
7 given, or the subject matter thereof, in any subsequent proceeding in, or trial of, this action or
8 any other action or proceeding;

9 2) The right to object to other discovery procedures involving or relating to
10 the subject matter of the discovery herein responded to, including any discovery specifically
11 identified herein; and

12 3) The right at any time to revise, correct, add to, or clarify any of the
13 responses set forth herein.

14 Subject to this Preliminary Statement, which is incorporated by reference as though set
15 forth in full, and any specific objections set forth herein, responding party responds as follows:

16 II.

17 INTERROGATORIES

18 **Interrogatory Number 1:**

19 Does AVEK contend that AVEK has the right to pump return flows from State Water
20 Project water used in the BASIN?

21 For the purpose of this set of special interrogatories, "BASIN" shall mean the Antelope
22 Valley Groundwater Adjudication Area as defined by the court in this matter by order dated
23 March 16, 2007.

24 RESPONSE: Objection: incomplete (C.C.P. § 2030.060(d)). Without waiving this objection and
25 subject to it: Yes.

26 **Interrogatory Number 2:**

27 Set forth in detail all facts which support AVEK'S response to Special Interrogatory No.
28 1 above.

1 RESPONSE: AVEK has expended significant sums of money to be able to import, treat and
2 deliver, and has imported, treated and delivered, State Water Project water into and within the
3 area of adjudication; AVEK manifested its intention to recapture, use or otherwise control the
4 return flows resulting from the water it imports into the area of adjudication, including without
5 limitation, by way of its cross-complaint filed in this action, and it has the means to do so;
6 AVEK has not abandoned, conveyed to others or relinquished its right to recapture, use or
7 control the return flows resulting from the State Water Project water it imports into the area of
8 adjudication. Also see AVEK's amended Statement of Undisputed Facts supporting its motion
9 for summary adjudication, together with AVEK's motion for summary adjudication, Request
10 for Judicial Notice, declarations of Dan Flory, Dwayne Chisam, MWD, and all other pleadings
11 AVEK has posted or will post in support of its motion for summary adjudication, and all exhibit
12 attached thereto, all of which are incorporated herein by this reference as though set forth in full
13 herein. (C.C.P. section 2030.230.) Discovery is continuing and, accordingly, AVEK reserves
14 the right to amend or supplement this response in the event additional responsive information
15 is later discovered.

16 **Interrogatory Number 3:**

17 IDENTIFY all DOCUMENTS that support AVEK's contention that it has the right to
18 pump the return flows from State Water Project water used in the BASIN.

19 For the purpose of this set of special interrogatories, "IDENTIFY" shall mean to identify
20 the document's author, signor, sender, addressee, and all recipients; to state the document's title,
21 date, and number of pages; to describe its subject matter; and to state the document's present
22 location, the name and address of any person currently having custody or control of the
23 document, and any other descriptive information to identify the document sufficiently in a
24 subpoena duces tecum or a request for production.

25 For the purpose of this set of special interrogatories, "DOCUMENT" shall have the same
26 broad meaning as a writing has in California Evidence Code Section 250, and includes the
27 original or a copy of handwriting, typewriting, printing, photostats, photographs, electronically
28 stored information, and every other means of recording upon any tangible thing and form of

1 communicating or representation, including letters, words, pictures, sounds, or symbols, or
2 combinations of them.

3 RESPONSE: Objection: impermissibly compound (C.C.P. section 2030.230(f)). Without
4 waiving this objection and subject to it: see the response to No. 2 above, which is incorporated
5 herein by this reference.

6 **Interrogatory Number 4:**

7 Set forth the amount of return flows that AVEK claims a right to pump.

8 RESPONSE: AVEK claims the right to recapture, use or otherwise control the use of all return
9 flows which result from the State Water Project water AVEK imports into the area of
10 adjudication.

11 **Interrogatory Number 5:**

12 Set forth in detail all facts which support AVEK's response to Special Interrogatory No.
13 4 above.

14 RESPONSE: AVEK has expended significant sums of money to be able to import, treat and
15 deliver, and has imported, treated and delivered, State Water Project water into and within the
16 area of adjudication; AVEK manifested its intention to recapture, use or otherwise control the
17 return flows resulting from the water it imports into the area of adjudication, including without
18 limitation, by way of its cross-complaint filed in this action, and it has the means to do so;
19 AVEK has not abandoned, conveyed to others or relinquished its right to recapture, use or
20 control the return flows resulting from the State Water Project water it imports into the area of
21 adjudication. Also see AVEK's amended Statement of Undisputed Facts supporting its motion
22 for summary adjudication, together with AVEK's motion for summary adjudication, Request
23 for Judicial Notice, declarations of Dan Flory, Dwayne Chisam, MWD, and all other pleadings
24 AVEK has posted or will post in support of its motion for summary adjudication, and all exhibit
25 attached thereto, all of which are incorporated herein by this reference as though set forth in full
26 herein. (C.C.P. section 2030.230.) Discovery is continuing and, accordingly, AVEK reserves
27 the right to amend or supplement this response in the event additional responsive information
28 is later discovered.

1 **Interrogatory Number 6:**

2 IDENTIFY all DOCUMENTS that support AVEK's response to Special Interrogatory
3 No. 4 above.

4 RESPONSE: See AVEK's motion for summary adjudication; the amended separate statement
5 of undisputed facts in support of the motion; AVEK's request for judicial notice filed in support
6 of the motion; AVEK's supplemental brief in support of the motion; the supporting declarations
7 of Dan Flory, Dwayne Chisam and MWD; and the respective exhibits attached thereto, all of
8 which is incorporated herein by this reference as though set forth in full herein (C.C.P. section
9 2030.230).

10 **Interrogatory Number 7:**

11 Does AVEK contend that AVEK has the right to pump return flows from State Water
12 Project water that it sold to all its customers and that was used in the BASIN?

13 RESPONSE: Objection: compound. Without waiving this objection and subject to it: Yes.

14 **Interrogatory Number 8:**

15 If the response to Special Interrogatory No. 7 is not an unqualified yes, set forth in detail
16 all facts which support AVEK's response to Special Interrogatory No. 7 above.

17 RESPONSE: Not applicable.

18 **Interrogatory Number 9:**

19 If the response to Special Interrogatory No. 7 is not an unqualified yes, IDENTIFY all
20 DOCUMENTS that support AVEK's response to Special Interrogatory No. 7 above.

21 RESPONSE: Not applicable.

22 **Interrogatory Number 10:**

23 For each year from 1962 onward, set forth the amount of groundwater that AVEK has
24 pumped from the BASIN.

25 RESPONSE: Objection: impermissible compound; vague ("from 1962 onward"); and
26 unintelligible.

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Interrogatory Number 11:

Set forth in detail all facts which support AVEK's response to Special Interrogatory No. 10 above.

RESPONSE: Not applicable.

Interrogatory Number 12:

IDENTIFY all DOCUMENTS that support AVEK's response to Special Interrogatory No. 10 above.

RESPONSE: Not applicable.

Interrogatory Number 13:

Prior to 2006, did AVEK participate in any communication with any of its customers, in which AVEK contended it had the rights to pump return flows from State Water Project water used in the Basin?

RESPONSE: As far as AVEK is presently able to determine, it did not have a communication with any of its customers prior to 2006, regarding the right to pump return flows from SWP water used in the Basin. Discovery, however, is continuing and AVEK reserves the right to amend this response in the event information relating to this inquiry is later discovered.

Interrogatory Number 14:

If the answer to AVEK's response to Special Interrogatory No. 10 above is anything other than an unqualified no, set forth in detail all facts which support AVEK's response to Special Interrogatory No. 13.

RESPONSE: As far as AVEK is presently able to determine, it did not have a communication with any of its customers prior to 2006, regarding the right to pump return flows from SWP water used in the Basin. Discovery, however, is continuing and AVEK reserves the right to amend this response in the event information relating to this inquiry is later discovered.

Interrogatory Number 15:

IDENTIFY all DOCUMENTS that support AVEK's response to Special Interrogatory No. 13 above.

RESPONSE: Not applicable.

1 **Interrogatory Number 16:**

2 For each year from 1962 onward, set forth the amount of State Water Project water that
3 was available for AVEK to purchase from California's Department of Water Resources.

4 RESPONSE: Objection: impermissibly compound; vague ("from 1962 onward" and "to
5 purchase"); irrelevant and not reasonably calculated to lead to the discovery of admissible
6 evidence. Without waiving these objections and subject to them, see Exhibit 1 attached hereto
7 (C.C.P. § 2030.230).

8 **Interrogatory Number 17:**

9 Set forth in detail all facts which support AVEK's response to Special Interrogatory No.
10 16 above.

11 RESPONSE: See Exhibit 1 attached hereto (C.C.P. § 2030.230).

12 **Interrogatory Number 18:**

13 IDENTIFY all DOCUMENTS that support AVEK's response to Special Interrogatory
14 No. 16 above.

15 RESPONSE: See Exhibit 1 attached hereto (C.C.P. § 2030.230).

16 **Interrogatory Number 19:**

17 For each year from 1962 onward, set forth the amount of State Water Project that AVEK
18 requested to purchase from California's Department of Water Resources.

19 RESPONSE: Objection: impermissibly compound; vague ("from 1962 onward" and "to
20 purchase"); irrelevant and not reasonably calculated to lead to the discovery of admissible
21 evidence. Without waiving these objections and subject to them, see Exhibit 1 attached hereto
22 (C.C.P. § 2030.230).

23 **Interrogatory Number 20:**

24 Set forth in detail all facts which support AVEK's response to Special Interrogatory No.
25 19 above.

26 RESPONSE: See Exhibit 1 attached hereto (C.C.P. § 2030.230).

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Interrogatory Number 21:

IDENTIFY all DOCUMENTS that support AVEK's response to Special Interrogatory No. 19 above.

RESPONSE: See Exhibit 1 attached hereto (C.C.P. § 2030.230).

Interrogatory Number 22:

For each year from 1962 onward, set forth the amount of State Water Project water that AVEK purchased from California's Department of Water Resources.

RESPONSE: Objection: impermissibly compound; vague ("from 1962 onward" and "purchased"); irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving these objections and subject to them, see Exhibit 1 attached hereto (C.C.P. § 2030.230).

Interrogatory Number 23:

Set forth in detail all facts which support AVEK's response to Special Interrogatory No. 22 above.

RESPONSE: See Exhibit 1 attached hereto (C.C.P. § 2030.230).

Interrogatory Number 24:

IDENTIFY all DOCUMENTS that support AVEK's response to Special Interrogatory No. 22 above.

RESPONSE: See Exhibit 1 attached hrereto (C.C.P. § 2030.230).

Interrogatory Number 25:

For each year from 1962 onward, set forth the amount of State Water Project water that AVEK sold to its customers.

RESPONSE: Objection: impermissibly compound; vague ("from 1962 onward"); irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving this objection and subject to it: see Exhibit 1 attached hereto (C.C.P. § 2030.230).

Interrogatory Number 26:

Set forth in detail all facts which support AVEK's response to Special Interrogatory No. 25 above.

1 RESPONSE: See Exhibit 1 attached hereto (C.C.P. § 2030.230).

2 **Interrogatory Number 27:**

3 IDENTIFY all DOCUMENTS that support AVEK's response to Special Interrogatory
4 No. 25 above.

5 RESPONSE: See Exhibit 1 attached hereto (C.C.P. § 2030.230).

6 **Interrogatory Number 28:**

7 List each year, in which AVEK participated in California Department of Water
8 Resources' Turn-Back Water Pool Program to sell a portion of AVEK's allocated Table A State
9 Water Project water.

10 RESPONSE: Objection: irrelevant and not reasonably calculated to lead to the discovery of
11 admissible evidence. Without waiving this objection and subject to it: None.

12 **Interrogatory Number 29:**

13 Set forth in detail all facts which support AVEK's response to Special Interrogatory No.
14 28 above.

15 RESPONSE: Objection: irrelevant and not reasonably calculated to lead to the discovery of
16 admissible evidence. Without waiving this object and subject to it: AVEK did not participate
17 in the Turn-Back Water Pool Program to sell a portion of AVEK's allocated Table A State
18 Water Project water.

19 **Interrogatory Number 30:**

20 IDENTIFY all DOCUMENTS that support AVEK's response to Special Interrogatory
21 No. 28 above.

22 RESPONSE: Not applicable.

23 **Interrogatory Number 31:**

24 Does AVEK own or control any groundwater pumping wells in the BASIN?

25 RESPONSE: Yes.

26 **Interrogatory Number 32:**

27 Set forth in detail all facts which support AVEK's response to Special Interrogatory No.
28 31 above.

1 RESPONSE: See Exhibit 2 attached hereto (C.C.P. § 2030.230).

2 **Interrogatory Number 33:**

3 IDENTIFY all DOCUMENTS that support AVEK's response to Special Interrogatory
4 No. 31 above.

5 RESPONSE: See Exhibit 2 attached hereto (C.C.P. § 2030.230).

6 **Interrogatory Number 34:**

7 Set forth the amount of return flows that AVEK contends that AVEK had pumped.

8 RESPONSE: Objection: ambiguous ("had pumped"); also ambiguous as to time. Although
9 AVEK has pumped, and its tenants and predecessors in interest have pumped, groundwater
10 which may well have included some return flows from the State Water Project water AVEK has
11 imported into the area of adjudication, AVEK is not aware of the specific amount of pumped
12 water which constituted return flows.

13 **Interrogatory Number 35:**

14 Set forth in detail all facts which support AVEK's response to Special Interrogatory No.
15 34 above.

16 RESPONSE: Although AVEK has pumped, and its tenants and predecessors in interest have
17 pumped, groundwater which may well have included some return flows from the State Water
18 Project water AVEK has imported into the area of adjudication, AVEK is not aware of the
19 specific amount of pumped water which constituted return flows.

20 **Interrogatory Number 36:**

21 IDENTIFY all DOCUMENTS that support AVEK's response to Special Interrogatory
22 No. 34 above.

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1 RESPONSE: See documents and declarations previously produced by AVEK which are specific
2 to the amount of water pumped by AVEK and its tenants or predecessors in interest (C.C.P. §
3 2030.230).

4 Dated: December 9, 2013

BRUNICK, McELHANEY & KENNEDY

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7 By: 

8 WILLIAM J. BRUNICK
9 LELAND P. McELHANEY
10 Attorneys for Cross-Complainant,
11 ANTELOPE VALLEY-EAST KERN
12 WATER AGENCY
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VERIFICATION

I have read the foregoing ANTELOPE VALLEY-EAST KERN WATER AGENCY'S RESPONSES TO LOS ANGELES COUNTY WATERWORKS DISTRICT NO. 40'S SPECIAL INTERROGATORIES, SET ONE and know the contents thereof.

The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

Executed on 12/9/13, 2013, at Prindale, California.

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



Dwayne Chisam, Assistant General Manager,
Antelope Valley-East Kern Water Agency

EXHIBIT 1

AVEK Water Agency - Customer Water Delivery Report: 1962 thru 2012

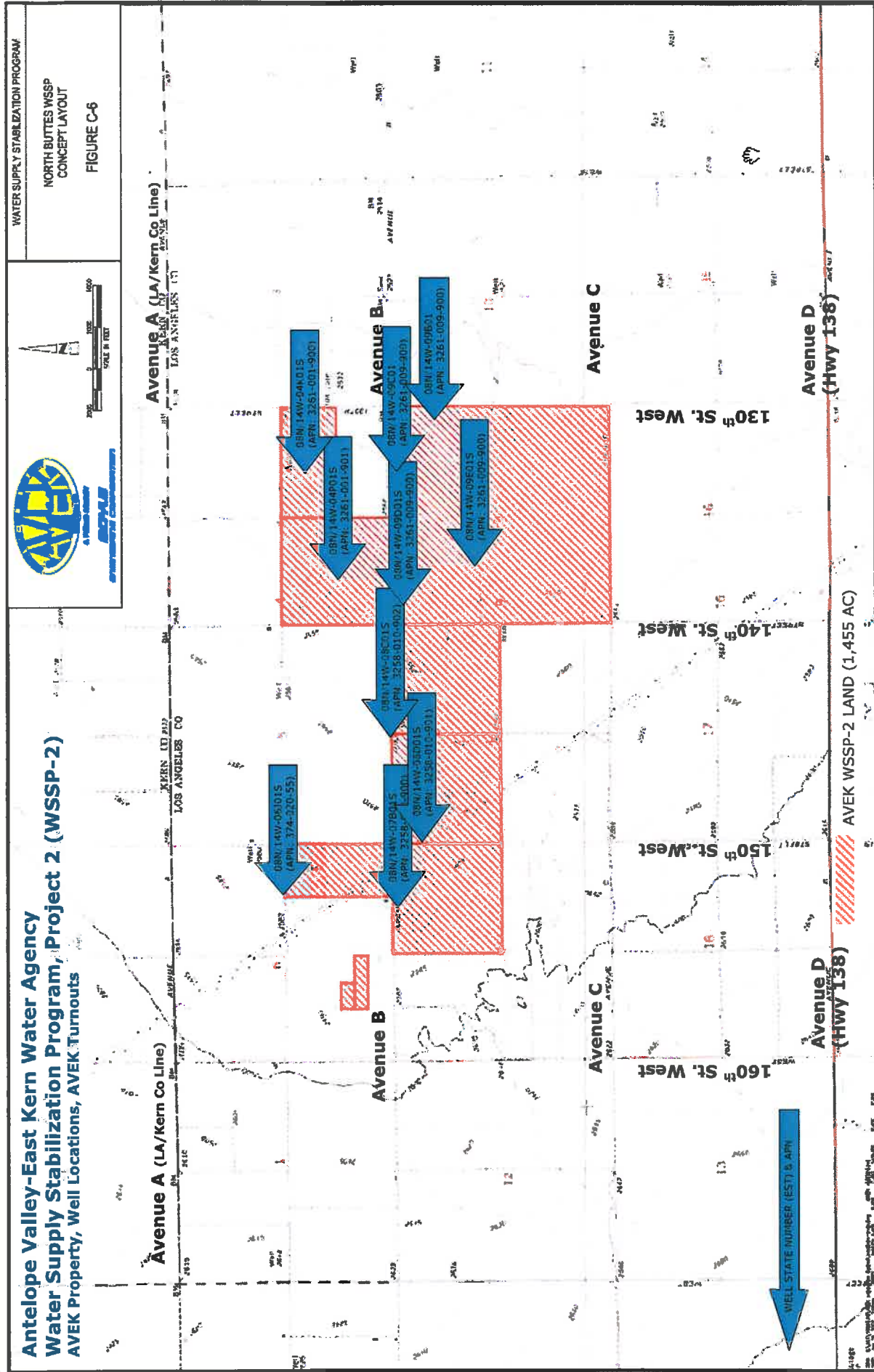
10/10/2013

Year	Max Table A Allocation (AF)	Available Table A Allocation %	Final Table A Allocation (AF)	AVEK Deliveries (AF)	DWR TOTAL (AF)
2012	141,400	65%	91,910	79,519	109,546
2011	141,400	80%	113,120	91,178	94,046
2010	141,400	50%	70,700	57,065	58,489
2009	141,400	40%	56,560	42,813	45,670
2008	141,400	35%	49,490	46,958	54,436
2007	141,400	60%	84,840	75,933	60,203
2006	141,400	100%	141,400	78,524	90,364
2005	141,400	90%	127,260	59,349	59,931
2004	141,400	65%	91,910	60,001	59,731
2003	141,400	90%	127,260	59,879	60,029
2002	141,400	70%	98,980	58,159	58,171
2001	138,400	39%	53,976	62,502	62,857
2000	138,400	90%	124,560	83,572	83,577
1999	138,400	100%	138,400	68,663	69,073
1998	138,400	100%	138,400	53,118	52,926
1997	138,400	100%	138,400	62,494	62,393
1996	138,400	100%	138,400	56,821	56,356
1995	138,400	100%	138,400	47,513	47,266
1994	138,400	50%	69,200	49,858	49,153
1993	138,400	100%	138,400	43,157	43,102
1992	138,400	45%	62,280	29,530	30,265
1991	138,400	30%	41,520	5,873	9,568
1990	138,400	100%	138,400	44,505	47,206
1989	138,400	100%	138,400	41,824	45,260
1988	138,400	100%	138,400	36,049	34,079
1987	138,400	100%	138,400	34,699	34,069
1986	138,400	100%	138,400	34,210	32,449
1985	138,400	100%	138,400	38,003	37,064
1984	138,400	100%	138,400	31,683	32,662
1983	138,400	100%	138,400	32,778	32,961
1982	138,400	100%	138,400	49,447	50,291
1981	138,400	100%	138,400	77,383	79,375
1980	138,400	100%	138,400	67,526	72,407
1979	138,400	100%	138,400	58,708	60,493
1978	138,400	100%	138,400	43,086	44,137
1977	138,400	90%	124,560	32,892	11,202
1976	138,400	100%	138,400	27,766	27,752
1975	138,400	100%	138,400	—	8,068
1974	138,400	100%	138,400	—	1,259
1973	138,400	100%	138,400	—	20
1972	138,400	100%	138,400	—	53
1971	138,400	100%	138,400	—	0
1970	138,400	100%	138,400	—	0
1969	138,400	100%	138,400	—	0
1968	138,400	100%	138,400	—	0
1967	—	—	—	—	0
1966	—	—	—	—	0
1965	—	—	—	—	0
1964	—	—	—	—	0
1963	—	—	—	—	0
1962	—	—	—	—	0
TOTALS			5,404,726	1,923,039	1,976,971

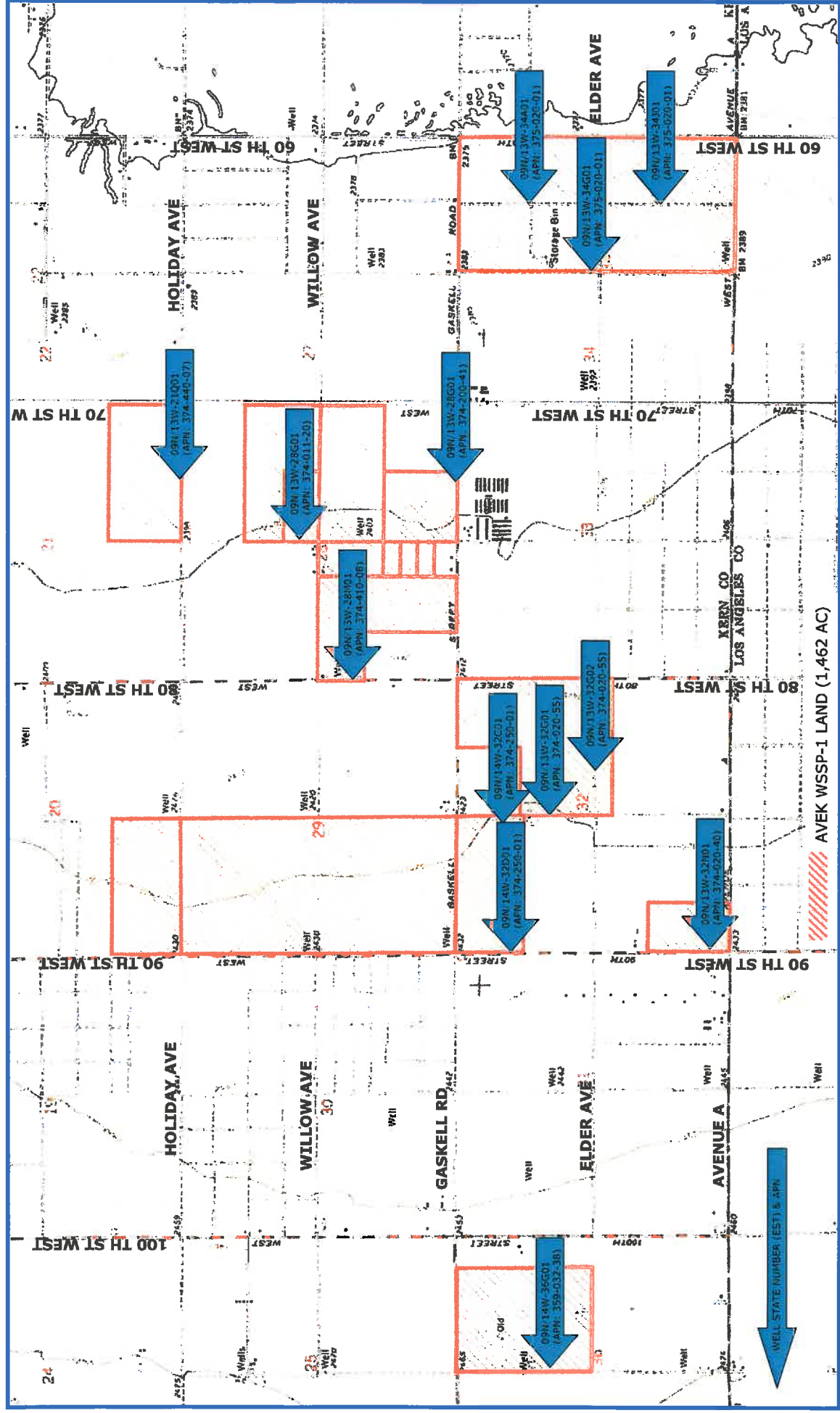
Notes:

- AVEK Historical Deliveries include all in-boundary deliveries (i.e. less Mojave WA transfers), and non-Table A water (Carry-Over, A21, etc.)
- AVEK Historical Deliveries taken from AVEK meter read sheet records. Records not available for years: 1972-1975.
- Negative values for AVEK Agricultural customers in 1991 represent pump-back deliveries into AVEK's untreated water system.
- DWR Historical AVEK Deliveries per DWR 132-13 TABLE B-5B.
- DWR/AVEK differential represents an approx. 3% system delivery loss.

EXHIBIT 2



**Antelope Valley-East Kern Water Agency (AVEK)
Water Supply Stabilization Program, Project 1 (WSSP-1)
AVEK Property, Well Locations**



VERIFICATION

I have read the foregoing ANTELOPE VALLEY-EAST KERN WATER AGENCY'S RESPONSES TO LOS ANGELES COUNTY WATERWORKS DISTRICT NO. 40'S SPECIAL INTERROGATORIES, SET ONE and know the contents thereof.

The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

Executed on 12/9/13, 2013, at Pomona, California.

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



Dwayne Chisam, Assistant General Manager,
Antelope Valley-East Kern Water Agency

1 **PROOF OF SERVICE**

2 **STATE OF CALIFORNIA }
3 COUNTY OF SAN BERNARDINO }**

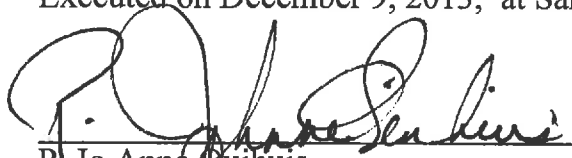
4 I am employed in the County of the San Bernardino, State of California. I am over
5 the age of 18 and not a party to the within action; my business address is 1839 Commercenter
West, San Bernardino, California 92408-3303.

6 On December 9, 2013, I served the foregoing document(s) described as:
7 **ANTELOPE VALLEY-EAST KERN WATER AGENCY'S RESPONSES TO LOS
ANGELES COUNTY WATERWORKS DISTRICT 40'S SPECIAL
8 INTERROGATORIES** on the interested parties in this action served in the following
manner:

9 ☒ **BY ELECTRONIC SERVICE AS FOLLOWS** by posting the document(s)
10 listed above to the Santa Clara website in the action of the *Antelope Valley Groundwater
Litigation*, Judicial Council Coordination Proceeding No. 4408, Santa Clara Case No.
1-05-CV-049053.

11
12 X (STATE) I declare under penalty of perjury under the laws of the State of California
13 that the above is true and correct.

14 Executed on December 9, 2013, at San Bernardino, California.

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16 Jo Anne Quihuis
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