Response to Form Interrogatories

# RIM RICHARDS | WATSON | GERSHON

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### FORM INTERROGATORY NO. 1.1:

State the name, ADDRESS, telephone number, and relationship to you of each PERSON who prepared or assisted in the preparation of the responses to these interrogatories. (Do not identify anyone who simply typed or reproduced the responses.)

### **RESPONSE TO FORM INTERROGATORY NO. 1.1:**

All responses to requests for admissions are objections by legal counsel.

### **FORM INTERROGATORY NO. 17.1:**

Is your response to each request for admission served with these interrogatories an unqualified admission? If not, for each response that is not an unqualified admission:

- (a) state the number of the request;
- (b) state all facts upon which you base your response;
- (c) state the names, ADDRESSES, and telephone numbers of all PERSONS who have knowledge of those facts; and
- (d) identify all DOCUMENTS and other tangible things that support your responses and state the name, ADDRESS, and telephone number of the PERSON who has each DOCUMENT or thing.

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# ININ RICHARDS | WATSON | GERSHON

## **RESPONSE TO FORM INTERROGATORY NO. 17.1:**

All responses to requests for admissions are objections by legal counsel.

Dated: June 26, 2007

WM. MATTHEW DITZHAZY City Attorney City of Palmdale

RICHARDS, WATSON & GERSHON A Professional Corporation JAMES L. MARKMAN STEVEN R. ORR ERIN L. PQWERS

By:

STEVEN R. ORR

Attorneys for Defendant, Cross-Complainant, and Cross-Defendant
CITY OF PALMDALE

1 PROOF OF SERVICE 2 I, Kelley Herrington, declare: 3 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 Richards, Watson & Gershon, 355 South Grand Avenue, 40th Floor, Los Angeles, California 90071. On June 26, 2007, I served the within 4 documents: 5 RESPONSE TO FORM INTERROGATORIES – SET ONE 6 by causing facsimile transmission of the document(s) listed above from (213) 626-7 0078 to the person(s) and facsimile number(s) set forth below on this date before 5:00 P.M. This transmission was reported as complete and without error. A copy 8 of the transmission report(s), which was properly issued by the transmitting facsimile machine, is attached. Service by facsimile has been made pursuant to a 9 prior written agreement between the parties. by posting the document(s) listed above to the Santa Clara County Superior Court 10 website in regard to the Antelope Valley Groundwater matter. 11 by placing the document(s) listed above in a sealed envelope and affixing a pre-12 paid air bill, and causing the envelope to be delivered to an agent for delivery, or deposited in a box or other facility regularly maintained by, in an envelope or 13 package designated by the express service carrier, with delivery fees paid or provided for, addressed to the person(s) at the address(es) set forth below. 14 by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below. 15 16 by causing personal delivery by First Legal Support Services, 1511 West Beverly Boulevard, Los Angeles, California 90026 of the document(s) listed above to the person(s) at the address(es) set forth below. 17 18 I declare under penalty of perjury under the laws of the State of California that the above is true and correct. 19 20 Executed on June 26, 2007. 21 22 23 24 25

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