| 1<br>2<br>3<br>4 | H. Jess Senecal (CSB #026826) Thomas S. Bunn III (CSB #89502) LAGERLOF, SENECAL, GOSNEY & KRUS 301 N. Lake Avenue, 10th Floor Pasadena, CA 91101-4108 Telephone: (626) 793-9400 Facsimile: (626) 793-5900 | SE, LLP        |                 |                    | M FILING FEES<br><u>T CODE</u> § 6103                  | UNDER                       |  |
|------------------|---|----------------|-----------------|--------------------|--|-----------------------------|--|
| 5                | Attorneys for Defendants and Cross-Complainants,<br>Palmdale Water District and Quartz Hill Water District  |                |                 | *                  | ×  |                             |  |
| 6                |   |                |                 |                    |  |                             |  |
| 7                |   |                |                 |                    |  |                             |  |
| 8                | SUPERIOR COURT OF THE STATE OF CALIFORNIA   |                |                 |                    |  |                             |  |
| 9                | FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT  |                |                 |                    |  |                             |  |
| 10               | e e   |                |                 |                    |  |                             |  |
| 11               | Coordination Proceeding   | . 1            | Judici          | al Council Co      | ordination   |                             |  |
| 12               | Special Title (Rule 1550 (b))   |                |                 | occeeding No. 4408 |  |                             |  |
| 13               | ANTELOPE VALLEY GROUNDW   | ATER           | CLAS            | S ACTION           |  |                             |  |
| 14               |   |                | [Assig<br>Santa | ned to The H       | onorable Jack &<br>Superior Court                      | Comar, Judge<br>, Dept. 17] |  |
| 15               | (i)   |                | Santa           | Clara Court C      | Case No. 1-05-C  | CV-049053                   |  |
| 16               |   |                |                 |                    |  |                             |  |
| 17               |   | ٠.             | QUAI<br>OBJE    | RTZ HILL W         | TER DISTRIC<br>VATER DISTI<br>D REQUEST F<br>F DOCUMEN | RICT'S<br>OR                |  |
| 19               | e u   |                | ONE             | ,                  |  | ,                           |  |
| 20               | (a)   |                | 10              |                    |  |                             |  |
| 21               | 20  |                |                 |                    |  | H                           |  |
| 22               | PROPOUNDING PARTY:  | Diamond Farmi  | ng Com          | ipany              |  | 817                         |  |
| 23               | RESPONDING PARTY:   | Palmdale Water | Distric         | t and Quartz I     | Hill Water Distr                                       | rict                        |  |
| 24               | SET NUMBER:   | One (1)        |                 |                    | 8  |                             |  |
| 25               |   |                |                 |                    |  |                             |  |
| 26               | ///   |                | 5 8             | A                  |  | 50 W                        |  |
| 27               |   |                |                 |                    |  |                             |  |
| 28               |   | ±              |                 |                    | a g  | 29<br>27<br>45              |  |
|                  |   |                |                 |                    |  |                             |  |

## **OBJECTION TO REQUEST NO. 1:** 1 Objection. The request is premature, burdensome and oppressive. This request seeks 2 information concerning class members and the court has not yet completed its class certification process. 3 4 No class representative has yet been approved by the court. 5 6 **OBJECTION TO REQUEST NO. 2:** Objection. The request is premature, burdensome and oppressive. This request seeks 7 information concerning class members and the court has not yet completed its class certification process. 8 9 No class representative has yet been approved by the court. 10 11 OBJECTION TO REQUEST NO. 3: Objection. The request is premature, burdensome and oppressive. This request seeks 12 information concerning class members and the court has not yet completed its class certification process. 13 14 No class representative has yet been approved by the court. 15 OBJECTION TO REQUEST NO. 4: 16 Objection. The request is premature, burdensome and oppressive. This request seeks 17 information concerning class members and the court has not yet completed its class certification process. 18 19 No class representative has yet been approved by the court. 20 OBJECTION TO REQUEST NO. 5: 21 Objection. The request is premature, burdensome and oppressive. This request seeks 22 information concerning class members and the court has not yet completed its class certification process. 23 No class representative has yet been approved by the court. 24 111 25 26 111 27

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## OBJECTION TO REQUEST NO. 6: Objection. The request is premature, burdensome and oppressive. This request seeks information concerning class members and the court has not yet completed its class certification process. No class representative has yet been approved by the court. LAGERLOF, SENECAL, GOSNEY & KRUSE, LLP Dated: June 26, 2007. Thomas S. Bunn III Attorneys for Defendants and Cross-Complainants Palmdale Water District and Quartz Hill Water District

| - 1  |  |  |  |  |  |  |  |
|------|--|--|--|--|--|--|--|
| 1    | VERIFICATION   |  |  |  |  |  |  |
| 2    |  |  |  |  |  |  |  |
| 3    | STATE OF CALIFORNIA )  |  |  |  |  |  |  |
| 4    | ) ss.  |  |  |  |  |  |  |
| 5    | COUNTY OF LOS ANGELES )  |  |  |  |  |  |  |
| 6    |  |  |  |  |  |  |  |
| 7    | I, Dennis D. LaMoreaux, the undersigned, say:  |  |  |  |  |  |  |
| 8    | I am General Manager of Palmdale Water District, one of the defendants and cross-complainants  |  |  |  |  |  |  |
| 9    | in the above-entitled proceedings; I have read the foregoing PALMDALE WATER DISTRICT'S   |  |  |  |  |  |  |
| 10   | 25 Sing 25 Sin 25 Sing |  |  |  |  |  |  |
| 1    | AND QUARTZ HILL WATER DISTRICT'S OBJECTIONS TO REQUEST FOR   |  |  |  |  |  |  |
| 2    | PRODUCTION OF DOCUMENTS, SET ONE and know the contents thereof; and I certify that the   |  |  |  |  |  |  |
| 3    | same is true of my own knowledge, except as to those matters which are therein stated upon my  |  |  |  |  |  |  |
| 4    | information or belief, and as to those matters I believe the same to be true.  |  |  |  |  |  |  |
| 5    | I declare under the penalty of perjury under the laws of the State of California that the foregoing  |  |  |  |  |  |  |
| 7    | is true and correct.   |  |  |  |  |  |  |
| 8    |  |  |  |  |  |  |  |
| 9    | Executed on June 26, 2007, at Palmdale, California.  |  |  |  |  |  |  |
| 20   | $\cap$ $\cap$ $\cap$   |  |  |  |  |  |  |
| 21   | Duis N. La Mneans  |  |  |  |  |  |  |
| 22   | Dennis D. LaMoreaux, General Manager   |  |  |  |  |  |  |
| 23   | Palmdale Water District  |  |  |  |  |  |  |
| 24   |  |  |  |  |  |  |  |
| 2.5  |  |  |  |  |  |  |  |
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VERIFICATION 1 2 STATE OF CALIFORNIA ) 3 4 ) ss. 5 COUNTY OF LOS ANGELES 6 7 I, Chad Reed, the undersigned, say: 8 I am General Manager of Quartz Hill Water District, one of the defendants and cross-9 complainants in the above-entitled proceedings; I have read the foregoing PALMDALE WATER 10 DISTRICT'S AND QUARTZ HILL WATER DISTRICT'S OBJECTIONS TO REQUEST FOR 11 PRODUCTION OF DOCUMENTS, SET ONE and know the contents thereof; and I certify that the 12 13 same is true of my own knowledge, except as to those matters which are therein stated upon my 14 information or belief, and as to those matters I believe the same to be true. 15 I declare under the penalty of perjury under the laws of the State of California that the foregoing 16 is true and correct. 17 18 Executed on June 26, 2007, at Quartz Hill, California. 19 20 21 Chad Reed, General Manager 22 Quartz Hill Water District 23 24 25 26 27 28

MDALE WATER DISTRICT'S AND QUARTZ HILL WATER DISTRICT'S