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

4 Attorneys for Defendant and Cross-Complainant,
5 Palmdale Water District
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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT**
10

11 Coordination Proceeding
12 Special Title (Rule 1550 (b))

Judicial Council Coordination
Proceeding No. 4408

13 **ANTELOPE VALLEY GROUNDWATER**
14 **CASES**

[Assigned to The Honorable Jack Komar, Judge
Santa Clara County Superior Court, Dept. 17]

Santa Clara Court Case No. 1-05-CV-049053

**NOTICE OF DEPOSITION OF PERSON
MOST KNOWLEDGEABLE AT VULCAN
MATERIALS COMPANY**

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20 PLEASE TAKE NOTICE that the Public Water Suppliers will take the deposition of the Person
21 Most Knowledgeable at Vulcan Materials Company as to the topics listed below. The deposition will be
22 taken on April 11, 2013, commencing at 10:00 AM at the offices of Veritext, 707 Wilshire Boulevard,
23 Suite 3500, Los Angeles, California, 90017, upon oral examination before a Certified Shorthand
24 Reporter. The deposition will continue from day to day, excluding Sundays and holidays, until complete.

25 The deposition will be in reference to paragraph 10 of the declaration of Robert Bowcock (Big
26 Rock Creek) and will cover the following topics:

27 1. Plans of Vulcan Materials Company to move its Sun Valley operations to Big Rock
28 Creek.

1 2. The existing permits for Big Rock Creek, including without limitation production
2 capacity, the products that can be produced, the permitted traffic that can ingress the site, and the overall
3 design of the plant and its current utilization.

4 3. Additional permitting and CEQA requirements, if any, for the proposed move.

5 4. Planned production capacities and operational plans of the proposed new processing
6 facilities at Big Rock Creek.

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8 The deponent is required to produce the following documents at the deposition:

9 1. All permits for the Big Rock Creek operation, including without limitation the
10 Conditional Use Permit, the conditions of approval, and the Reclamation Plan and any amendments
11 thereto.

12 2. All CEQA documents for the Big Rock Creek operation.

13 3. All writings relating to the proposed move of the Sun Valley operations to Big Rock
14 Creek.

15 4. All writings relating to the proposed facilities at Big Rock Creek, including planned
16 production capacities.

17 5. All writings relating to additional permitting and CEQA requirements for the proposed
18 move of the Sun Valley operations to Big Rock Creek.

19 6. All writings relating to communications with residents of the community of Crystallaire or
20 other residents in close proximity to the Big Rock Creek site relative to truck traffic and the Vulcan
21 Materials Company Big Rock Creek Mine Operation.

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24 Dated: April 1, 2013

LAGERLOF, SENEAL, GOSNEY & KRUSE

25
26 By: _____

27 Thomas S. Bunn III
28 Attorneys for Palmdale Water District