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

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

Coordination Proceeding
Special Title (Rule 1550(b)),

**ANTELOPE VALLEY
GROUNDWATER CASES**

Judicial Council Coordination Proceeding
No. 4408

Santa Clara Case No. 1-05-CV-049053
Assigned to the Hon. Jack Komar
Dept: D17

**FIRST SET OF SPECIALLY
PREPARED INTERROGATORIES**

Propounding Parties:

City of Palmdale
City of Lancaster
Los Angeles County Waterworks District No. 40
Palmdale Water District
Quartz Hill Water District
Littlerock Creek Irrigation District
Palm Ranch Irrigation District
Rosamond Community Services District
California Water Service Company, successor in
interest to Antelope Valley Water Company

Responding Parties:

Land Projects Mutual Water Company
Tierra Bonita Mutual Water Company

Set Number:

One

The City of Palmdale, City of Lancaster, Los Angeles County Waterworks District No. 40, Palmdale Water District, Quartz Hill Water District, Littlerock Creek Irrigation District, Palm Ranch Irrigation District, Rosamond Community Services District, and California Water Service Company, successor in interest to Antelope Valley Water Company hereby propound these specially prepared interrogatories upon the parties listed in Exhibit 1 pursuant to Code of Civil Procedure section 2030.010, *et seq.*, and following the Case Management Conference held in this matter on May 21, 2007, wherein the Court indicated its desire that the process of identifying, naming and serving the parties be completed as soon as possible.

SPECIALLY DEFINED TERMS

“BASIN” means the real property located within the jurisdictional boundary of the Antelope Valley Groundwater Cases as defined by the Revised Order After Hearing in Jurisdictional Boundary dated March 12, 2007.

“IDENTIFY” means to set forth, to the extent known or reasonably ascertainable, the name(s) of the PROPERTY OWNER, the last known address of the PROPERTY OWNER, the telephone number of the PROPERTY OWNER, assessor’s parcel number of property, street address of property, parcel description, and parcel size of any parcel of real property owned by any person or entity the responding party contends is indispensable or necessary to these proceedings.

“PROPERTY” means (a) a parcel of real property located within the BASIN that is 100 acres or more and is not served water by any of the PUBLIC WATER SUPPLIERS, or (b) a collection of parcels that constitute 100 acres or more, are owned by a common PROPERTY OWNER, and are not served water by any of the PUBLIC WATER SUPPLIERS.

“PROPERTY OWNER” means the person(s) or entity(ies) believed to hold or actually holding some or all of the fee interest in PROPERTY.

1 “PUBLIC WATER SUPPLIERS” means the City of Palmdale, City of Lancaster,
2 Los Angeles County Waterworks District No. 40, Palmdale Water District, Quartz Hill
3 Water District, Littlerock Creek Irrigation District, Palm Ranch Irrigation District,
4 Rosamond Community Services District, and California Water Service Company,
5 successor in interest to Antelope Valley Water Company.

6
7 **SPECIALLY PREPARED INTERROGATORIES**

8 1. If you have asserted an affirmative defense in response to any complaint or
9 cross-complaint in these proceedings that alleges that the complaining party has failed to
10 join an indispensable party, please IDENTIFY any such indispensable party.

11 2. If you have asserted an affirmative defense in response to any complaint or
12 cross-complaint in these proceedings that alleges that the complaining party has failed to
13 join a necessary party, please IDENTIFY any such necessary party.

14 3. Are you aware of any PROPERTY within the BASIN for which the
15 PROPERTY OWNER has not been named as a party to these proceedings?

16 4. If your response to Interrogatory No. 3 is affirmative, please IDENTIFY
17 the PROPERTY.

18 5. If your response to Interrogatory No. 3 is affirmative, please IDENTIFY
19 the PROPERTY OWNER.

20 6. If your response to Interrogatory No. 3 is affirmative, please state whether
21 you believe that groundwater has been pumped from that PROPERTY.

22 7. If your response to Interrogatory No. 3 is affirmative, please state whether
23 you believe that groundwater is currently being pumped from that PROPERTY.

24 8. Please state the name of any other person or entity you believe is an
25 indispensable party to these proceedings.

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1 9. Please state the name of any other person or entity you believe is a
2 necessary party to these proceedings.

3
4 DATED: June 13, 2007

LEMIEUX & O'NEILL
WAYNE LEMIEUX

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6 LAGERLOF, SENEAL, GOSNEY & KRUSE
THOMAS BUNN III

7 BEST, BEST & KRIEGER LLP
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10 STRADLING, YOCCA, CARLSON & RAUTH
DOUGLAS J. EVERTZ

11 CALIFORNIA WATER SERVICE COMPANY
12 JOHN TOOTLE

13 RICHARDS, WATSON & GERSHON
A Professional Corporation
14 JAMES L. MARKMAN
STEVEN R. ORR
15 ERIN L. POWERS

16
17 By: 

18 STEVEN R. ORR
Attorneys for Defendant, Cross-Complainant
19 and Defendant
20 CITY OF PALMDALE
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PROOF OF SERVICE

I, Linda I. Pomatto, declare:

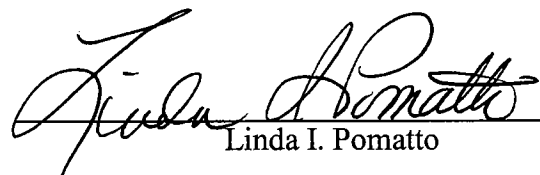
I am a resident of the State of California and over the age of eighteen years, and not a party to the within action; my business address is Richards, Watson & Gershon, 355 South Grand Avenue, 40th Floor, Los Angeles, California 90071. On June 13, 2007, I served the within documents:

FIRST SET OF SPECIALLY PREPARED INTERROGATORIES

- ☐ by causing facsimile transmission of the document(s) listed above from (213) 626-0078 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 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 prior written agreement between the parties.
- ☒ by posting the document(s) listed above to the Santa Clara County Superior Court website in regard to the Antelope Valley Groundwater matter.
- ☐ by placing the document(s) listed above in a sealed envelope and affixing a pre-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 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.
- ☐ by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.
- ☐ 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.

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

Executed on June 13, 2007.


Linda I. Pomatto