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Attorneys for Defendant CITY OF LOS ANGELES and

8 LOS ANGELES WORLD AIRPORTS

9 Attorneys for Cross-Defendants City of Los

Angeles and Los Angeles World Airports

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

11 **COUNTY OF LOS ANGELES**

12
13 Coordination Proceeding

Case No. 105 CV 049053

14 ANTELOPE VALLEY GROUNDWATER
15 CASES,

Judicial Council Coordination
Proceeding No. 4408

16 Los Angeles County Waterworks District No.
40 v. Diamond Farming Co.; Los Angeles
17 County Waterworks District No. 40 v.
Diamond Farming Co.; TEJON RANCH
18 Farms, Inc. v. City of Lancaster; Diamond
Farming Co. v. City of Lancaster; Diamond
19 Farming Co. v. Palmdale Water District,

**CROSS-DEFENDANT CITY OF LOS
ANGELES' RESPONSE TO FIRST SET
OF REQUESTS FOR ADMISSION
PROPOUNDED BY DEFENDANT AND
CROSS-COMPLAINANT TEJON RANCH
PROPERTIES, LLC**

20
21 AND RELATED ACTIONS

The Hon. Jack Komar
Santa Clara Case No. 105 CV 049053

Riverside County Superior Court
Lead Case No. RIC 344436
Case No. RIC 344668
Case No. RIC 353840

Los Angeles Superior Court Case
No. BC 325201

Kern County Superior Court Case
No. S-1500-CV-254348

26 PROPOUNDING PARTY: Defendant and Cross-Complainant TEJON RANCH Properties,
27 LLC

28 RESPONDING PARTY: Cross-Defendant City of Los Angeles

1 SET NO.: One

2 Pursuant to Sections 2033.010, *et seq.*, of the California Code of Civil Procedure, Cross-
3 Defendant City of Los Angeles ("Responding Party") hereby submits these objections and
4 responses to the First Set of Requests for Admission propounded by Defendant and Cross-
5 Complainant TEJON RANCH Properties, LLC ("Propounding Party").

6 **PRELIMINARY STATEMENT**

7 Nothing in this response should be construed as an admission by Responding Party with
8 respect to the admissibility or relevance of any fact or document, or of the truth or accuracy of any
9 characterization or statement of any kind contained in Propounding Party's Requests for
10 Admission. Responding Party has not completed its investigation of the facts relating to this case,
11 its discovery or its preparation for trial. All responses and objections contained herein are based
12 only upon information that is presently available to and specifically known by Responding Party.
13 It is anticipated that further discovery, independent investigation, legal research and analysis will
14 supply additional facts and add meaning to known facts, as well as establish entirely new factual
15 conclusions and legal contentions, all of which may lead to substantial additions to, changes in and
16 variations from the responses set forth herein. The following objections and responses are made
17 without prejudice to Responding Party's right to produce at trial, or otherwise, evidence regarding
18 any subsequently discovered information. Responding Party accordingly reserves the right to
19 modify and amend any and all responses herein as research is completed and contentions are
20 made.

21 **GENERAL OBJECTIONS**

22 Responding Party generally objects to the Requests for Admission as follows:

23 1. Responding Party objects generally to the Requests for Admission to the extent that
24 they seek to elicit information that is neither relevant to the subject matter of this action, nor
25 reasonably calculated to lead to the discovery of admissible evidence;

26 2. Responding Party objects generally to the Requests for Admission to the extent that
27 they are unreasonably overbroad in scope, and thus burdensome and oppressive, in that each such
28 request seeks information pertaining to items and matters that are not relevant to the subject matter

1 of this action, or, if relevant, so remote therefrom as to make its disclosure of little or no practical
2 benefit to Propounding Party, while placing a wholly unwarranted burden and expense on
3 Responding Party in locating, reviewing and producing the requested information;

4 3. Responding Party objects generally to the Requests for Admission to the extent that
5 they are burdensome and oppressive, in that ascertaining the information necessary to respond to
6 them would require the review and compilation of information from multiple locations, and
7 voluminous records and files, thereby involving substantial time of employees of Responding
8 Party and great expense to Responding Party, whereas the information sought to be obtained by
9 Propounding Party would be of little use or benefit to Propounding Party;

10 4. Responding Party objects generally to the Requests for Admission to the extent that
11 they are vague, uncertain and overbroad, being without limitation as to time or specific subject
12 matter;

13 5. Responding Party objects generally to the Requests for Admission to the extent that
14 they seek information at least some of which is protected by the attorney-client privilege or the
15 attorney work-product doctrine, or both;

16 6. Responding Party objects generally to the Requests for Admission to the extent that
17 they seek to have Responding Party furnish information that is a matter of the public record, and
18 therefore, is equally available to the propounding party as to Responding Party; and

19 7. Responding Party objects generally to the Requests for Admission to the extent that
20 they seek to have Responding Party furnish information that is proprietary to Responding Party
21 and contain confidential information.

22 8. Responding Party objects to the Requests for Admission, and to any individual
23 request set forth therein, to the extent that they are compound and constitute an impermissible
24 effort to circumvent the 35 special request limit set by Section 2033.030 of the California Code of
25 Civil Procedure.

26 9. Responding Party expressly incorporates each of the foregoing General Objections
27 into each specific response to the requests set forth below as if set forth in full therein. An answer
28 to a request is not intended to be a waiver of any applicable specific or general objection to such

request.

Without waiver of the foregoing, Responding Party further responds as follows:

RESPONSES TO REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 1:

You have not acquired any prescriptive rights as against TEJON RANCH.

RESPONSE TO REQUEST FOR ADMISSION NO. 1:

Admit.

REQUEST FOR ADMISSION NO. 2:

YOU have not alleged or will not make any prescriptive claims against any real property owned by TEJON RANCH.

RESPONSE TO REQUEST FOR ADMISSION NO. 2:

Admit.

REQUEST FOR ADMISSION NO. 3:

YOU have not acquired any prescriptive rights against any real property owned by TEJON RANCH.

RESPONSE TO REQUEST FOR ADMISSION NO. 3:

Admit.

REQUEST FOR ADMISSIONS NO. 4:

YOU have not filed an 'in rem' action for prescription.

RESPONSE TO REQUEST FOR ADMISSION NOS. 4 through 14:


Not applicable.

1 Dated: February 6, 2014

MICHAEL N. FEUER, Los Angeles City Attorney
RICHARD M. BROWN, General Counsel, Water and
Power
RAYMOND ILGUNAS, General Counsel, Los Angeles
World Airports

KRONICK, MOSKOVITZ, TIEDEMANN &
GIRARD, P.C.

6
7 By:



Janet K. Goldsmith

Attorneys for Defendant CITY OF LOS
ANGELES and
LOS ANGELES WORLD AIRPORTS

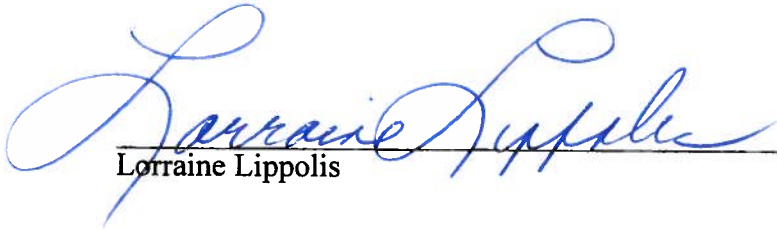
PROOF OF SERVICE

I DECLARE THAT:

I am employed in the County of Sacramento, State of California. I am over the age of eighteen years and not a party to the within action. My business address is 400 Capitol Mall, 27th Floor, Sacramento, California 95814.

On February 6, 2014, I served the attached CROSS DEFENDANT CITY OF LOS ANGELES' RESPONSE TO FIRST SET OF REQUESTS FOR ADMISSIONS PROPOUNDED BY DEFENDANT AND CROSS-COMPLAINANT TEJON RANCH PROPERTIES, by posting the document to the Santa Clara Superior Court website www.scefiling.org. in regard to the Antelope Valley Groundwater matter.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct and that this document was executed on February 6, 2014.


Lorraine Lippolis