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CALIFORNIA WATER SERVICE COMPANY
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4 Attorney for Defendants/Cross-Complaint
5 CALIFORNIA WATER SERVICE COMPANY (SUCCESSOR TO
ANTELOPE VALLEY WATER COMPANY)

6 SUPERIOR COURT OF THE STATE OF CALIFORNIA

7 IN AND FOR THE COUNTY OF LOS ANGELES

8
9 ANTELOPE VALLEY GROUNDWATER CASES

) RELATED CASE TO JUDICIAL COUNCIL
) COORDINATION PROCEEDING NO. 4408

10 This Pleading Relates to Included
Action:

11 REBECCA LEE WILLIS, on behalf of
herself and all others similarly
12 situated,

) CALIFORNIA WATER SERVICE COMPANY'S
) FIRST SUPPLEMENTAL RESPONSE TO ITS
) RESPONSE TO PLAINTIFF WILLIS' FIRST
) SET OF SPECIAL INTERROGATORIES

13 Plaintiff,

14 Vs.

15 LOS ANGELES COUNTY WATERWORKS
DISTRICT NO. 40; CITY OF LANCASTER;
CITY OF LOS ANGELES; CITY OF
16 PALMDALE; PALMDALE WATER DISTRICT;
LITTLEROCK CREEK IRRIGATION DISTRICT;
PALM RANCH IRRIGATION DISTRICT;
17 QUARTZ HILL WATER DISTRICT; ANTELOPE
VALLEY WATER CO.; ROSAMOND COMMUNITY
18 SERVICE DISTRICT; MOJAVE PUBLIC
UTILITY DISTRICT; and DOES 1 through
19 1,000;

20 Defendants.

1 PROPOUNDING PARTY: PLAINTIFF, REBECCA WILLIS

2 RESPONDING PARTY: DEFENDANT, CALIFORNIA WATER SERVICE COMPANY

3 SET: One (1)

4 Defendant, CALIFORNIA WATER SERVICE COMPANY (successor-in-interest to
5 ANTELOPE VALLEY WATER COMPANY) hereinafter referred to as the
6 "Company," submits the following supplemental response to Special
7 Interrogatories, Set One, propounded by Plaintiff REBECCA LEE WILLIS
8 ("Willis"):

9 **PRELIMINARY STATEMENT**

10 The Company is in the process of conducting its investigation and
11 discovery in this action. Consequently, the Company responds to these
12 Special Interrogatories to the best of its knowledge, but in doing so,
13 reserves the right to amend its response at a future date. The Company
14 further reserves the right to offer, at time of trial, facts, testimony
15 or other evidence discovered subsequent to and not included in this
16 response, and assumes no obligation to voluntarily supplement or amend
17 this response to reflect such facts, testimony or other evidence.

18 **GENERAL OBJECTIONS**

19 By responding to Willis' Special Interrogatories, Set One, the Company
20 does not concede the relevancy or materiality of any request, or of the
21 subject to which such request refers. Each response is made subject to
22 all objections as to competence, relevance, materiality, propriety,
23 admissibility, attorney-client privilege, attorney work product
24 doctrine, and the deliberative process privilege, as well as any or all
25 other objections and grounds that would require exclusion of evidence.

1 The Company reserves the right to make any and all such objections at
2 trial and at any other proceeding relating to this action. The
3 specific responses and objections given below are submitted without
4 prejudice to, and without waiving, any of these objections even though
5 the general objections are not expressly set forth in each response.

6 **OBJECTIONS AND RESPONSES**

7 The Company incorporates fully the foregoing Preliminary Statement and
8 General Objections into each of the following specific objections and
9 responses, and no specific objection or response shall be construed to
10 waive any of the General Objections.

11 **SPECIAL INTERROGATORY NO. 14:**

12 If YOU contend that YOU have any correlative rights to the use of
13 groundwater in the Basin, state each and every fact in support of your
14 contention.

15 **FIRST SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 14:**

16 The Company incorporates herein its Preliminary Statement and General
17 Objections. The Company objects to this Interrogatory to the extent it
18 seeks information protected by the attorney work product doctrine.

19 Subject to and without waiving the foregoing objections, the Company
20 contends that it has correlative overlying rights. The Company
21 contends that overlying landowners within its certificated service area
22 transferred substantially all their groundwater rights to the Company,
23 or its legal predecessors-in-interest.

24 //

25 //

1 SPECIAL INTERROGATORY NO. 15:

2 If YOU contend that YOU have any correlative rights to the use of
3 groundwater in the Basin, state the quantity of such rights.

4 FIRST SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 15:

5 The Company incorporates herein its Preliminary Statement and General
6 Objections. The Company objects to this Interrogatory to the extent it
7 seeks information protected by the attorney work product doctrine.
8 Additionally, the answer to this interrogatory is the subject of
9 current expert witness study or opinion and/or testimony that has not
10 yet been fully developed and may be answered at the time such study is
11 completed and appropriately disclosed. Subject to and without waiving
12 the foregoing objections, the Company contends that its correlative
13 rights are equal to or greater than its historical groundwater pumping
14 and equal to its correlative or pro-rata share of the groundwater
15 basin's native safe yield, which overlyers are entitled.

16
17 I declare under penalty of perjury under the laws of the State of
18 California that the foregoing answers are true and correct.
19

20 DATED: July 30, 2008

CALIFORNIA WATER SERVICE COMPANY

21
22 By: 

23 JOHN S. TOOTLE, ESQ.
24
25

VERIFICATION

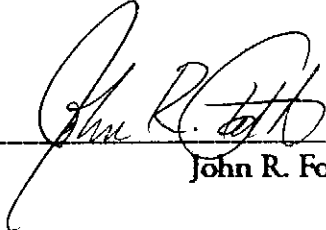
STATE OF CALIFORNIA)
) ss
COUNTY OF LOS ANGELES)

I, John R. Foth, declare:

I am an Engineering Manager for the California Water Service Company, successor to the Antelope Valley Water Company in the above entitle action. I have read the foregoing CALIFORNIA WATER SERVICE COMPANY'S FIRST SUPPLEMENTAL RESPONSE TO ITS RESPONSE TO PLAINTIFF REBECCA WILLIS' FIRST SET OF SPECIAL INTERROGATORIES and know the contents thereof. I am informed and believe that the same is true and correct.

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

Executed at Torrance, California, Los Angeles County on July 30, 2008

:  _____
John R. Foth

1 **PROOF OF SERVICE (C.C.P. §1013a, 2015.5)**

2 **Antelope Valley Groundwater Cases**

3 **Judicial Counsel Proceeding No. 4408**

4 **Santa Clara County Superior Court Case No. 1-05-CV-049053**

5 I am employed in the County of Los Angeles, State of California. I am
6 over the age of 18 and not a party to the within action; my business address
7 is 2632 West 237th Street, Torrance, CA 90505.

8 On July 30, 2008, I served the foregoing document(s) entitled:

9 **CALIFORNIA WATER SERVICE COMPANY'S 1ST SUPPLEMENTAL RESPONSE TO ITS RESPONSE
10 TO PLAINTIFF WILLIS' FIRST SET OF SPECIAL INTERROGATORIES**

11 by placing the true copies thereof enclosed in sealed
12 envelopes addressed as stated on the attached mailing
13 list.

14 by placing _ the original, _ a true copy thereof,
15 enclosed in a sealed enveloped addressed as follows:

16 **X BY SANTA CLARA SUPERIOR COURT E-FILING IN COMPLEX LITIGATION
17 PURSUANT TO CLARIFICATION ORDER DATED OCTOBER 27, 2005.**

18 Executed on July 30, 2008, at Torrance, California

19 **X (State) I declare under penalty of perjury under the laws of
20 the State of California that the above is true and
21 correct.**

22 (Federal) I declare that I am employed in the office of a
23 member of the Bar of this Court at whose direction
24 the service was made.

25 
Michael Duque