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7 CALIFORNIA WATER SERVICE COMPANY, A  
8 CALIFORNIA CORPORATION  
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SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES – CENTRAL DISTRICT

**ANTELOPE VALLEY  
GROUNDWATER CASES**

Included Actions:

Los Angeles County Waterworks District  
No. 40 v. Diamond Farming Co., Superior  
Court of California, County of Los  
Angeles, Case No. BC 325201;

Los Angeles County Waterworks District  
No. 40 v. Diamond Farming Co., Superior  
Court of California, County of Kern, Case  
No. S-1500-CV-254-348;

Wm. Bolthouse Farms, Inc. v. City of  
Lancaster, Diamond Farming Co. v. City of  
Lancaster, Diamond Farming Co. v.  
Palmdale Water Dist., Superior Court of  
California, County of Riverside, Case Nos.  
RIC 353 840, RIC 344 436, RIC 344 668

Judicial Council Coordination No. 4408

**CLASS ACTION**

Santa Clara Case No. 1-05-CV-049053  
Assigned to The Honorable Jack Komar

**CALIFORNIA WATER SERVICE  
COMPANY'S OBJECTIONS TO  
REQUESTS FOR ADMISSIONS, SET ONE**

PROPOUNDING PARTY: Diamond Farming Company  
RESPONDING PARTY: California Water Service Company  
SET NUMBER: One (1)

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1 OBJECTION TO REQUEST NO. 1:

2       Objection. This request is not reasonably calculated to lead to the discovery of admissible  
3 evidence. The request is manifestly irrelevant and calculated to harass.

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5 OBJECTION TO REQUEST NO. 2:

6       Deny, California Water Service Company, a California Corporation, owns and operates a  
7 public water system.

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9 OBJECTION TO REQUEST NO. 3:

10       Objection. The request is premature, burdensome and oppressive. This request seeks  
11 information concerning class members and the court has not yet completed its class certification  
12 process. No class representative has yet been approved by the court.

13  
14 OBJECTION TO REQUEST NO. 4:

15       Objection. The request is premature, burdensome and oppressive. This request seeks  
16 information concerning class members and the court has not yet completed its class certification  
17 process. No class representative has yet been approved by the court.

18  
19 OBJECTION TO REQUEST NO. 5:

20       Objection. The request is premature, burdensome and oppressive. This request seeks  
21 information concerning class members and the court has not yet completed its class certification  
22 process. No class representative has yet been approved by the court.

23  
24 OBJECTION TO REQUEST NO. 6:

25       Objection. The request is premature, burdensome and oppressive. This request seeks  
26 information concerning class members and the court has not yet completed its class certification  
27 process. No class representative has yet been approved by the court.

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1 OBJECTION TO REQUEST NO. 7:

2       Objection. The request is premature, burdensome and oppressive. This request seeks  
3 information concerning class members and the court has not yet completed its class certification  
4 process. No class representative has yet been approved by the court.

5  
6 OBJECTION TO REQUEST NO. 8:

7       Objection. The request is premature, burdensome and oppressive. This request seeks  
8 information concerning class members and the court has not yet completed its class certification  
9 process. No class representative has yet been approved by the court.

10  
11 OBJECTION TO REQUEST NO. 9:

12       Objection. The request is premature, burdensome and oppressive. This request seeks  
13 information concerning class members and the court has not yet completed its class certification  
14 process. No class representative has yet been approved by the court.

15  
16 OBJECTION TO REQUEST NO. 10:

17       Objection. The request is premature, burdensome and oppressive. This request seeks  
18 information concerning class members and the court has not yet completed its class certification  
19 process. No class representative has yet been approved by the court.

20  
21 OBJECTION TO REQUEST NO. 11:

22       Objection. The request is premature, burdensome and oppressive. This request seeks  
23 information concerning class members and the court has not yet completed its class certification  
24 process. No class representative has yet been approved by the court.

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1 OBJECTION TO REQUEST NO. 12:

2       Objection. The request is premature, burdensome and oppressive. This request seeks  
3 information concerning class members and the court has not yet completed its class certification  
4 process. No class representative has yet been approved by the court.

5  
6 OBJECTION TO REQUEST NO. 13:

7       Objection. The request is premature, burdensome and oppressive. This request seeks  
8 information concerning class members and the court has not yet completed its class certification  
9 process. No class representative has yet been approved by the court.

10  
11 OBJECTION TO REQUEST NO. 14:

12       Objection. The request is premature, burdensome and oppressive. This request seeks  
13 information concerning class members and the court has not yet completed its class certification  
14 process. No class representative has yet been approved by the court.

15  
16 OBJECTION TO REQUEST NO. 15:

17       Objection. The request is premature, burdensome and oppressive. This request seeks  
18 information concerning class members and the court has not yet completed its class certification  
19 process. No class representative has yet been approved by the court.

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21 OBJECTION TO REQUEST NO. 16:

22       Objection. The request is premature, burdensome and oppressive. This request seeks  
23 information concerning class members and the court has not yet completed its class certification  
24 process. No class representative has yet been approved by the court.

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1 OBJECTION TO REQUEST NO. 17:

2       Objection. The request is premature, burdensome and oppressive. This request seeks  
3 information concerning class members and the court has not yet completed its class certification  
4 process. No class representative has yet been approved by the court.  
5

6 OBJECTION TO REQUEST NO. 18:

7       Objection. The request is premature, burdensome and oppressive. This request seeks  
8 information concerning class members and the court has not yet completed its class certification  
9 process. No class representative has yet been approved by the court.  
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11 OBJECTION TO REQUEST NO. 19:

12       Objection. The request is premature, burdensome and oppressive. This request seeks  
13 information concerning class members and the court has not yet completed its class certification  
14 process. No class representative has yet been approved by the court.  
15

16 OBJECTION TO REQUEST NO. 20:

17       Objection. The request is premature, burdensome and oppressive. This request seeks  
18 information concerning class members and the court has not yet completed its class certification  
19 process. No class representative has yet been approved by the court.  
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21 OBJECTION TO REQUEST NO. 21:

22       Objection. The request is premature, burdensome and oppressive. This request seeks  
23 information concerning class members and the court has not yet completed its class certification  
24 process. No class representative has yet been approved by the court.  
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1 OBJECTION TO REQUEST NO. 22:

2       Objection. The request is premature, burdensome and oppressive. This request seeks  
3 information concerning class members and the court has not yet completed its class certification  
4 process. No class representative has yet been approved by the court.

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6 OBJECTION TO REQUEST NO. 23:

7       Objection. The request is premature, burdensome and oppressive. This request seeks  
8 information concerning class members and the court has not yet completed its class certification  
9 process. No class representative has yet been approved by the court.

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11 OBJECTION TO REQUEST NO. 24:

12       Objection. The request is premature, burdensome and oppressive. This request seeks  
13 information concerning class members and the court has not yet completed its class certification  
14 process. No class representative has yet been approved by the court.

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16 OBJECTION TO REQUEST NO. 25:

17       Objection. The request is premature, burdensome and oppressive. This request seeks  
18 information concerning class members and the court has not yet completed its class certification  
19 process. No class representative has yet been approved by the court.

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21 OBJECTION TO REQUEST NO. 26:

22       Objection. The request is premature, burdensome and oppressive. This request seeks  
23 information concerning class members and the court has not yet completed its class certification  
24 process. No class representative has yet been approved by the court.

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1 OBJECTION TO REQUEST NO. 27:

2       Objection. The request is premature, burdensome and oppressive. This request seeks  
3 information concerning class members and the court has not yet completed its class certification  
4 process. No class representative has yet been approved by the court.  
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6 OBJECTION TO REQUEST NO. 28:

7       Objection. The request is premature, burdensome and oppressive. This request seeks  
8 information concerning class members and the court has not yet completed its class certification  
9 process. No class representative has yet been approved by the court.  
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11 OBJECTION TO REQUEST NO. 29:

12       Objection. The request is premature, burdensome and oppressive. This request seeks  
13 information concerning class members and the court has not yet completed its class certification  
14 process. No class representative has yet been approved by the court.  
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16 OBJECTION TO REQUEST NO. 30:

17       Objection. The request is premature, burdensome and oppressive. This request seeks  
18 information concerning class members and the court has not yet completed its class certification  
19 process. No class representative has yet been approved by the court.  
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21 OBJECTION TO REQUEST NO. 31:

22       Objection. The request is premature, burdensome and oppressive. This request seeks  
23 information concerning class members and the court has not yet completed its class certification  
24 process. No class representative has yet been approved by the court.  
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1 OBJECTION TO REQUEST NO. 32:

2       Objection. The request is premature, burdensome and oppressive. This request seeks  
3 information concerning class members and the court has not yet completed its class certification  
4 process. No class representative has yet been approved by the court.  
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6 OBJECTION TO REQUEST NO. 33:

7       Objection. The request is premature, burdensome and oppressive. This request seeks  
8 information concerning class members and the court has not yet completed its class certification  
9 process. No class representative has yet been approved by the court.  
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11 OBJECTION TO REQUEST NO. 34:

12       Objection. The request is premature, burdensome and oppressive. This request seeks  
13 information concerning class members and the court has not yet completed its class certification  
14 process. No class representative has yet been approved by the court.  
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16 OBJECTION TO REQUEST NO. 35:

17       Objection. The request is premature, burdensome and oppressive. This request seeks  
18 information concerning class members and the court has not yet completed its class certification  
19 process. No class representative has yet been approved by the court.  
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21 OBJECTION TO REQUEST NO. 36:

22       Objection. The request is premature, burdensome and oppressive. This request seeks  
23 information concerning class members and the court has not yet completed its class certification  
24 process. No class representative has yet been approved by the court.  
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1 OBJECTION TO REQUEST NO. 37:

2       Objection. The request is premature, burdensome and oppressive. This request seeks  
3 information concerning class members and the court has not yet completed its class certification  
4 process. No class representative has yet been approved by the court.  
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6 OBJECTION TO REQUEST NO. 38:

7       Objection. The request is premature, burdensome and oppressive. This request seeks  
8 information concerning class members and the court has not yet completed its class certification  
9 process. No class representative has yet been approved by the court.  
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11 OBJECTION TO REQUEST NO. 39:

12       Objection. The request is premature, burdensome and oppressive. This request seeks  
13 information concerning class members and the court has not yet completed its class certification  
14 process. No class representative has yet been approved by the court.  
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16 OBJECTION TO REQUEST NO. 40:

17       Objection. The request is premature, burdensome and oppressive. This request seeks  
18 information concerning class members and the court has not yet completed its class certification  
19 process. No class representative has yet been approved by the court.  
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21 OBJECTION TO REQUEST NO. 41:

22       Objection. The request is premature, burdensome and oppressive. This request seeks  
23 information concerning class members and the court has not yet completed its class certification  
24 process. No class representative has yet been approved by the court.  
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1 OBJECTION TO REQUEST NO. 42:

2       Objection. The request is premature, burdensome and oppressive. This request seeks  
3 information concerning class members and the court has not yet completed its class certification  
4 process. No class representative has yet been approved by the court.

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6 OBJECTION TO REQUEST NO. 43:

7       Objection. The request is premature, burdensome and oppressive. This request seeks  
8 information concerning class members and the court has not yet completed its class certification  
9 process. No class representative has yet been approved by the court.

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11 OBJECTION TO REQUEST NO. 44:

12       Objection. The request is premature, burdensome and oppressive. This request seeks  
13 information concerning class members and the court has not yet completed its class certification  
14 process. No class representative has yet been approved by the court.

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16 OBJECTION TO REQUEST NO. 45:

17       Objection. The request is premature, burdensome and oppressive. This request seeks  
18 information concerning class members and the court has not yet completed its class certification  
19 process. No class representative has yet been approved by the court.

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21 OBJECTION TO REQUEST NO. 46:

22       Objection. The request is premature, burdensome and oppressive. This request seeks  
23 information concerning class members and the court has not yet completed its class certification  
24 process. No class representative has yet been approved by the court.

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1 OBJECTION TO REQUEST NO. 47:

2       Objection. The request is premature, burdensome and oppressive. This request seeks  
3 information concerning class members and the court has not yet completed its class certification  
4 process. No class representative has yet been approved by the court.

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6 OBJECTION TO REQUEST NO. 48:

7       Objection. The request is premature, burdensome and oppressive. This request seeks  
8 information concerning class members and the court has not yet completed its class certification  
9 process. No class representative has yet been approved by the court.

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11 OBJECTION TO REQUEST NO. 49:

12       Objection. The request is premature, burdensome and oppressive. This request seeks  
13 information concerning class members and the court has not yet completed its class certification  
14 process. No class representative has yet been approved by the court.

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16 OBJECTION TO REQUEST NO. 50:

17       Objection. The request is premature, burdensome and oppressive. This request seeks  
18 information concerning class members and the court has not yet completed its class certification  
19 process. No class representative has yet been approved by the court.

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21 OBJECTION TO REQUEST NO. 51:

22       Objection. The request is premature, burdensome and oppressive. This request seeks  
23 information concerning class members and the court has not yet completed its class certification  
24 process. No class representative has yet been approved by the court.

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1 OBJECTION TO REQUEST NO. 52:

2       Objection. The request is premature, burdensome and oppressive. This request seeks  
3 information concerning class members and the court has not yet completed its class certification  
4 process. No class representative has yet been approved by the court.  
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6 OBJECTION TO REQUEST NO. 53:

7       Objection. The request is premature, burdensome and oppressive. This request seeks  
8 information concerning class members and the court has not yet completed its class certification  
9 process. No class representative has yet been approved by the court.  
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11 OBJECTION TO REQUEST NO. 54:

12       Objection. The request is premature, burdensome and oppressive. This request seeks  
13 information concerning class members and the court has not yet completed its class certification  
14 process. No class representative has yet been approved by the court.  
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16 OBJECTION TO REQUEST NO. 55:

17       Objection. The request is premature, burdensome and oppressive. This request seeks  
18 information concerning class members and the court has not yet completed its class certification  
19 process. No class representative has yet been approved by the court.  
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21 OBJECTION TO REQUEST NO. 56:

22       Objection. The request is premature, burdensome and oppressive. This request seeks  
23 information concerning class members and the court has not yet completed its class certification  
24 process. No class representative has yet been approved by the court.  
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1 OBJECTION TO REQUEST NO. 57:

2       Objection. The request is premature, burdensome and oppressive. This request seeks  
3 information concerning class members and the court has not yet completed its class certification  
4 process. No class representative has yet been approved by the court.

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6 OBJECTION TO REQUEST NO. 58:

7       Objection. The request is premature, burdensome and oppressive. This request seeks  
8 information concerning class members and the court has not yet completed its class certification  
9 process. No class representative has yet been approved by the court.

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11 OBJECTION TO REQUEST NO. 59:

12       Objection. The request is premature, burdensome and oppressive. This request seeks  
13 information concerning class members and the court has not yet completed its class certification  
14 process. No class representative has yet been approved by the court.


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16 OBJECTION TO REQUEST NO. 60:

17       Objection. The request is premature, burdensome and oppressive. This request seeks  
18 information concerning class members and the court has not yet completed its class certification  
19 process. No class representative has yet been approved by the court.

20 Dated: June 26, 2007

JOHN S. TOOTLE

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23 By

  
JOHN S. TOOTLE  
Attorney for Cross-Complainants  
CALIFORNIA WATER SERVICE  
COMPANY