

1 JOHN S. TOOTLE, BAR NO. 181822
2 2632 WEST 237TH STREET
3 TORRANCE, CA 90505
4 TELEPHONE: (310) 257-1488
5 TELECOPIER: (310) 325-5658
6 Attorneys for Cross-Complainants
7 CALIFORNIA WATER SERVICE COMPANY, A
8 CALIFORNIA CORPORATION
9

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

12 **ANTELOPE VALLEY**
13 **GROUNDWATER CASES**

14 Included Actions:

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

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

23 Wm. Bolthouse Farms, Inc. v. City of
24 Lancaster, Diamond Farming Co. v. City of
25 Lancaster, Diamond Farming Co. v.
26 Palmdale Water Dist., Superior Court of
27 California, County of Riverside, Case Nos.
28 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
REQUEST FOR PRODUCTION OF
DOCUMENTS, SET ONE**

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

//

//

//

//

1 OBJECTION TO REQUEST NO. 1:

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. 2:

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. 3:

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. 4:

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. 5:

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.

25 //

26 //

27 //

28 //

1 OBJECTION TO REQUEST NO. 6:

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
7 Dated: June 26, 2007

JOHN S. TOOTLE

8
9 By


10 JOHN S. TOOTLE
11 Attorney for Cross-Complainants
12 CALIFORNIA WATER SERVICE
13 COMPANY
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28