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EXEMPT FROM FILING FEES
GOVERNMENT CODE § 6103

Attorneys for Cross-Defendants,
County Sanitation Districts of Los Angeles
County Nos. 14 and 20

SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

Coordination Proceeding
Special Title (Rule 1550(b))

**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 325 201

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,
consolidated actions, Case Nos. RIC 353 840, RIC
344 436,
RIC 344 668.

Judicial Council Coordination
Proceeding No. 4408

ASSIGNED FOR ALL PURPOSES TO:
Judge: Honorable Jack Komar

**NOTICE OF OBJECTION TO
NOTICE OF DEPOSITION AND
REQUEST FOR PRODUCTION OF
DOCUMENTS OF WITNESS
RAYMOND TREMBLAY FOR
COUNTY SANITATION
DISTRICTS OF LOS ANGELES
COUNTY NOS. 14 AND 20**

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**TO MICHAEL FIFE, ATTORNEY OF RECORD FOR THE ANTELOPE VALLEY
GROUNDWATER AGREEMENT ASSOCIATION, THE NOTICING PARTIES
DESCRIBED BELOW, AND ALL OTHER COUNSEL OF RECORD IN THE
ANTELOPE VALLEY GROUNDWATER CASES:**

The County Sanitation Districts of Los Angeles County Nos. 14 (Lancaster) and 20 (Palmdale)(collectively “Districts”), cross-defendant in the above action, pursuant to Cal.C.C.P. §2025.410, object to the Notice of Deposition and Request for Production of Documents of Raymond Tremblay, witness for the Districts, dated February 25, 2013, of the Antelope Valley Groundwater Agreement Association, the Tejon Ranchcorp and Tejon Ranch Company, Granite Construction Company, the Frank and Yvonne Lane Family Trust Dated March 5, 1993 as Restated July 20, 2000, Little Rock Sand and Gravel, Inc., Littlerock Aggregate Co., Inc. dba Antelope Valley Aggregate, Inc., A.C. Warnack as Trustee of the A.C. Warnack Trust, A. V. Materials, Inc., the George and Charlene Lane Family Trust, Holliday Rock Co., Inc., Grimmway Enterprises, Inc., Diamond Farming Company, Crystal Organic Farms LLC, U.S. Borax, Inc., Bolthouse Properties, LLC., Wm. Bolthouse Farms, Inc., and Landinv, Inc. (collectively the “Noticing Parties”), on the following grounds:

1. The notice of deposition and request for production of documents is untimely as to deponent Raymond Tremblay. *See* Second Amendment to Case Management Order for Phase Four Trial, dated February 15, 2013 (“no deposition will be noticed on less than 5 court days’ notice”).
2. The notice of deposition fails to specify with sufficient particularity the things to be produced at the deposition. *See* Cal. Code Civ. Proc., § 2025.220.
3. The notice of deposition fails to describe the areas to be covered during the deposition as required by Cal. Code Civ. Proc., § 2025.220.
4. The request for production of documents calls for irrelevant information, is overbroad, vague and ambiguous, unduly burdensome and oppressive.

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2 Dated February 28, 2013.

3 Respectfully submitted,

4 ELLISON, SCHNEIDER & HARRIS, LLP

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6 By:



7 Christopher M. Sanders
8 Attorneys for Cross-Defendants,
9 County Sanitation Districts of Los
10 Angeles County Nos. 14 and 20
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1 **Proof of Service**

2 I declare that:

3 I am employed in the County of Sacramento, State of California. I am over the age of
4 eighteen years and am not a party to the within action. My business address is ELLISON,
5 SCHNEIDER & HARRIS; 2600 Capitol Avenue, Suite 400; Sacramento, California 95816;
6 telephone (916) 447-2166.

7 On February 28, 2013, I served the County Sanitation Districts' *Notice of Objection to*
8 *Notice of Deposition and Request for Production of Documents of Witness Raymond Tremblay*
9 *for County Sanitation Districts of Los Angeles County Nos. 14 and 20* by electronic posting to
10 the Santa Clara Superior Court E-Filing website,
11 <http://www.scefiling.org/cases/casehome.jsp?caseId=19>.

12 I declare under penalty of perjury that the foregoing is true and correct and that this
13 declaration was executed on February 28, 2013, at Sacramento, California.

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Patty Slomski