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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))

Judicial Council Coordination  
Proceeding No. 4408

**ANTELOPE VALLEY GROUNDWATER  
CASES**

ASSIGNED FOR ALL PURPOSES TO:  
Judge: Honorable Jack Komar

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

**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**

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.

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**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

The County Sanitation Districts of Los Angeles County Nos. 14 (Lancaster) and 20 (Palmdale) (collectively "Districts"), cross-defendant in the above action, object to the Notice of Deposition and Request for Production of Documents of Raymond Tremblay, witness for the Districts, dated April 9, 2013, of the Antelope Valley Groundwater Agreement Association. The identified topics of testimony are overly broad and that makes the production of documents unduly burdensome or not relevant or reasonably calculated to lead to the discovery of admissible evidence. The Districts also object to the extent that the requested testimony or documents seek to invade the attorney-client and or attorney work product doctrine. Without waiving the stated objections, Mr. Tremblay will appear for the deposition.

The Districts further object to each document request as follows:

1. The Districts object to Request for Production No. 2 on the ground that the request exceeds the scope of the Discovery Order for Phase 4 Trial. (See Discovery Order I.1(E).) Without waiving the stated objection, the Districts will produce a responsive document.
2. The Districts object to Request for Production No. 3 on the ground that the request exceeds the scope of the Discovery Order for Phase 4 Trial. (See Discovery Order I.1(E).) Without waiving the stated objection, the Districts will produce a responsive document.
3. The Districts object to Request for Production No. 11 on the ground that the request is overbroad, vague and ambiguous, unduly burdensome and oppressive. The Districts further object to the request on the ground that it seeks documents protected by the attorney-client privilege and attorney work product doctrine. The Districts will not produce a responsive document.
4. The Districts object to Request for Production No. 12 on the ground that the request is overbroad, vague and ambiguous, unduly burdensome and oppressive. The Districts further object to the request on the ground that it seeks documents protected by the

1 attorney-client privilege and attorney work product doctrine. The Districts will not  
2 produce a responsive document.

- 3 5. The Districts object to Request for Production No. 14 on the ground that it seeks  
4 documents protected by the attorney-client privilege and attorney work product doctrine.  
5 The Districts will not produce a responsive document.
- 6 6. The Districts object to Request for Production No. 15 on the ground that it seeks  
7 documents protected by the attorney-client privilege and attorney work product doctrine.  
8 Without waiving the stated objection, the Districts will produce a responsive document.
- 9 7. The Districts object to Request for Production No. 16 on the ground that the request  
10 exceeds the scope of the Discovery Order for Phase 4 Trial. (See Discovery Order  
11 I.1(E).) Without waiving the stated objection, the Districts will produce a responsive  
12 document.

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14 Dated April 15, 2013.

15 Respectfully submitted,

16 ELLISON, SCHNEIDER & HARRIS, LLP

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18 By: 

19 Christopher M. Sanders  
20 Attorneys for Cross-Defendants,  
21 County Sanitation Districts of Los  
22 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 April 15, 2013, I served the County Sanitation Districts' *Notice of Objection to Notice*  
8 *of Deposition and Request for Production of Documents of Witness Raymond Tremblay for*  
9 *County Sanitation Districts of Los Angeles County Nos. 14 and 20* by electronic posting to the  
10 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 April 15, 2013, at Sacramento, California.

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16 Patty Slomski  
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