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Attorneys for ANTELOPE VALLEY- EAST KERN WATER AGENCY

*Exempt from filing fee pursuant to
Gov't. Code Section 6103*

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

11 Coordination Proceeding
12 Special Title (Rule 1550(b))

13 **ANTELOPE VALLEY GROUNDWATER
14 CASES**

15 Palmdale Water District and Quartz Hill Water
16 District,

17 Cross-Complainants,

18 vs.

19 Los Angeles County Waterworks District No.
20 40, et al.,

Cross-Defendants.

Judicial Council Coordination Proceeding
No. 4408

Santa Clara Case No. 1-05-CV-049053
Assigned to The Honorable Jack Komar, Dept. 17

**ANTELOPE VALLEY-EAST KERN WATER
AGENCY'S RESPONSES TO SPECIALLY
PREPARED INTERROGATORIES
(SET ONE)**

21
22 **Propounding Parties: CITY OF PALMDALE, et al.**

23 **Responding Party: Cross-Complainant/Cross-Defendant,**
24 **ANTELOPE VALLEY EAST-KERN WATER AGENCY**

25 **Set Number: One**

26 Responding Party, Cross-Complainant/Cross-Defendant, ANTELOPE VALLEY EAST-
27 KERN WATER AGENCY, has not completed its investigation of the facts in this case and has not
28

1 initiated formal discovery. The responses to this First Set of Specially Prepared Interrogatories are
2 therefore preliminary and may not be complete. The responses contained herein are based upon such
3 information and documents presently available to and specifically known to the Responding Party and
4 are given without prejudice to their rights to produce evidence of any subsequently discovered facts.

5 **SPECIAL INTERROGATORY NUMBER 1:**

6 If you have asserted an affirmative defense in response to any complaint or cross-complaint in
7 these proceedings that alleges that the complaining party has failed to join an indispensable party,
8 please IDENTIFY any such indispensable party.

9 **RESPONSE TO SPECIAL INTERROGATORY NUMBER 1:**

10 Agency currently knows of no additional parties than those already named. Discovery,
11 investigation and analysis are continuing.

12 **SPECIAL INTERROGATORY NUMBER 2:**

13 If you have asserted an affirmative defense in response to any complaint or cross-complaint in
14 these proceedings that alleges that the complaining party has failed to join a necessary party, please
15 IDENTIFY any such necessary party.

16 **RESPONSE TO SPECIAL INTERROGATORY NUMBER 2:**

17 Agency currently knows of no additional parties than those already named. Discovery,
18 investigation and analysis are continuing.

19 **SPECIAL INTERROGATORY NUMBER 3:**

20 Are you aware of any PROPERTY within the BASIN for which the PROPERTY OWNER has
21 not been named as a party to these proceedings?

22 **RESPONSE TO SPECIAL INTERROGATORY NUMBER 3:**

23 Agency currently knows of no additional parties than those already named. Discovery,
24 investigation and analysis are continuing.

25 **SPECIAL INTERROGATORY NUMBER 4:**

26 If your response to Interrogatory No. 3 is affirmative, please IDENTIFY the PROPERTY.

1 **RESPONSE TO SPECIAL INTERROGATORY NUMBER 4:**

2 Please see Response to Interrogatory No. 3, above.

3 **SPECIAL INTERROGATORY NUMBER 5:**

4 If your response to Interrogatory No. 3 is affirmative, please IDENTIFY the PROPERTY
5 OWNER.

6 **RESPONSE TO SPECIAL INTERROGATORY NUMBER 5:**

7 Please see Response to Interrogatory No. 3, above.

8 **SPECIAL INTERROGATORY NUMBER 6:**

9 If your response to Interrogatory No. 3 is affirmative, please state whether you believe that
10 groundwater has been pumped from the PROPERTY.
11

12 **RESPONSE TO SPECIAL INTERROGATORY NUMBER 6:**

13 Please see Response to Interrogatory No. 3, above.

14 **SPECIAL INTERROGATORY NUMBER 7:**

15 If your response to Interrogatory No. 3 is affirmative, please state whether you believe that
16 groundwater is currently being pumped from that PROPERTY.

17 **RESPONSE TO SPECIAL INTERROGATORY NUMBER 7:**

18 Please see Response to Interrogatory No. 3, above.

19 **SPECIAL INTERROGATORY NUMBER 8:**

20 Please state the name of any other person or entity you believe is an indispensable party to
21 these proceedings.
22

23 **RESPONSE TO SPECIAL INTERROGATORY NUMBER 8:**

24 Agency currently knows of no additional parties than those already named. Discovery,
25 investigation and analysis are continuing.

26 **SPECIAL INTERROGATORY NUMBER 9:**

27 Please state the name of any other person or entity you believe is a necessary party to these
28 proceedings.

1 **RESPONSE TO SPECIAL INTERROGATORY NUMBER 9:**

2 Agency currently knows of no additional parties than those already named. Discovery,
3 investigation and analysis are continuing.

4 DATED: July 11, 2007

BRUNICK, McELHANEY & BECKETT

6 By: William J. Brunick
7 William J. Brunick
8 Attorneys for Cross-Complainant/
9 Cross-Defendants
10 ANTELOPE VALLEY EAST-KERN
11 WATER AGENCY
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VERIFICATION

I have read the foregoing Responses to Special Interrogatories, Set One, and know the contents thereof.

The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

Executed on 7-10-07 2007, at Palmdale, California.

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

A handwritten signature in black ink, appearing to read "Russell E. Fuller", is written over a horizontal line.


Russell Fuller, General Manager
Antelope Valley-East Kern Water Agency

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I am employed in the County of the San Bernardino, State of California. I am over the age of 18 and not a party to the within action; my business address is 1839 Commercenter West, San Bernardino, California.

XX BY ELECTRONIC SERVICE AS FOLLOWS by posting the document(s) listed above to the Santa Clara website in the action of the *Antelope Valley Groundwater Litigation*, Judicial Council Coordination Proceeding No. 4408, Santa Clara Case No. 1-05-CV-049053.

Executed on July 11, 2007, at San Bernardino, California.


P. Jo Anne Quihuis