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Attorneys for Defendants, JOHNNY ZAMRZLA,
PAMELLA ZAMRZLA, JOHNNY LEE
ZAMRZLA AND JEANETTE ZAMRZLA
(collectively "ZAMRZLA'S")

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

Coordinated Proceeding,
Special Title (Rule 1550(b))

ANTELOPE VALLEY
GROUNDWATER CASES.

Judicial Council Coordination
Proceeding No.: 4408

LASC Case No. BC325201

Santa Clara Sup. Court Case No.: 1-05-CV-049053
Assigned to Hon. Jack Komar, Judge of the Santa
Clara County Superior Court

**OBJECTION TO AMENDED NOTICE OF
DEPOSITION OF PAMELLA ZAMRZLA
AND REQUEST FOR PRODUCTION OF
DOCUMENTS**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Pursuant to California Code of Civil Procedure section 2025.410, Defendants JOHNNY ZAMRZLA, PAMELLA ZAMRZLA, JOHNNY LEE ZAMRZLA AND JEANETTE ZAMRZLA hereby object to the Notice of Taking Deposition of Pamela Zamrzla, and request for production of documents, as follows:

OBJECTIONS TO DEPOSITION

Defendants object to this deposition to the extent it seeks information outside the agreed-upon scope of the issues to be heard at the hearing on October 25, 2022.

RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS

DEMAND FOR PRODUCTION NO. 1:

All DOCUMENTS RELATING TO the Antelope Valley Groundwater Adjudication, JCCP No. 4408.

RESPONSE TO DEMAND NO. 1:

Responding party objects that this request is overbroad as to scope and time. This request fails to identify a particularized category of documents. Responding party objects to this request to the extent it seeks documents protected by the attorney-client privilege and/or the attorney work product doctrine. This request seeks documents that are publicly available and thus equally available to propounding party.

DEMAND FOR PRODUCTION NO. 2:

All DOCUMENTS obtained from Norm Hickling.

RESPONSE TO DEMAND NO. 2:

Responding party objects that this request is overbroad as to scope and time. Responding party objects to this request to the extent it seeks documents protected by the attorney-client privilege and/or the attorney work product doctrine. This request seeks information that is not relevant to the subject matter of the litigation, and this request is not reasonably calculated to lead to the discovery of admissible evidence.

DEMAND FOR PRODUCTION NO. 3:

All deeds RELATING TO the PROPERTY.

RESPONSE TO DEMAND NO. 3:

Responding party objects that this request is overbroad as to time. This request seeks information that is not relevant to the subject matter of the litigation, and this request is not reasonably calculated to lead to the discovery of admissible evidence. This request seeks documents that are publicly available and thus equally available to propounding party.

DEMAND FOR PRODUCTION NO. 24:

All title reports RELATING TO the PROPERTY.

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RESPONSE TO DEMAND NO. 4:

Responding party objects that this request vague and ambiguous with respect to the term “title reports.” This request is overbroad as to time. This request seeks information that is not relevant to the subject matter of the litigation, and this request is not reasonably calculated to lead to the discovery of admissible evidence.

DEMAND FOR PRODUCTION NO. 5:

All real property tax bills RELATING TO the PROPERTY since January 1, 2000.

RESPONSE TO DEMAND NO. 5:

Responding party objects that this request is overbroad as to time. This request seeks information that is not relevant to the subject matter of the litigation, and this request is not reasonably calculated to lead to the discovery of admissible evidence. This request seeks documents that are publicly available and thus equally available to propounding party.

DEMAND FOR PRODUCTION NO. 6:

All photographs and video taken on or after January 1, 2000, depicting the PROPERTY or any portion thereof.

RESPONSE TO DEMAND NO. 6:

Responding party objects that this request is so overbroad as to scope and time as to be burdensome and harassing. This request seeks information that is not relevant to the subject matter of the litigation, and this request is not reasonably calculated to lead to the discovery of admissible evidence. This request invades responding party’s right to privacy.

DEMAND FOR PRODUCTION NO. 7:

All photographs and video depicting any water well or any portion thereof on the PROPERTY.

RESPONSE TO DEMAND NO. 7:

Responding party objects that this request is overbroad as to time. This request seeks information that is not relevant to the subject matter of the litigation, and this request is not reasonably calculated to lead to the discovery of admissible evidence.

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DEMAND FOR PRODUCTION NO. 8:

All photographs and video taken on or after January 1, 2000, depicting any electrical panel on the PROPERTY.

RESPONSE TO DEMAND NO. 8:

Responding party objects that this request is so overbroad as to scope and time as to be burdensome and harassing. This request seeks information that is not relevant to the subject matter of the litigation, and this request is not reasonably calculated to lead to the discovery of admissible evidence. This request invades responding party's right to privacy.

DEMAND FOR PRODUCTION NO. 9:

All DOCUMENTS RELATING TO each and every water well on the PROPERTY including, without limitation, drilling permits, drilling logs, installation, maintenance and repair records.

RESPONSE TO DEMAND NO. 9:

Responding party objects that this request vague and ambiguous with respect to the term "limitation, drilling permits, drilling logs, installation, maintenance and repair records." This request is overbroad as to scope and time. This request seeks information that is not relevant to the subject matter of the litigation, and this request is not reasonably calculated to lead to the discovery of admissible evidence.

DEMAND FOR PRODUCTION NO. 10:

All DOCUMENTS, including maps, plats and the like depicting the location of any water systems on the PROPERTY, including all mains, laterals, valves and sprinkler lines.

RESPONSE TO DEMAND NO. 10:

Responding party objects that this request vague and ambiguous with respect to the term "maps, plats and the like depicting the location of any water systems on the PROPERTY, including all mains, laterals, valves and sprinkler lines." This request is overbroad as to scope and time. This request seeks information that is not relevant to the subject matter of the litigation, and this request is not reasonably calculated to lead to the discovery of admissible evidence.

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DEMAND FOR PRODUCTION NO. 11:

All DOCUMENTS evidencing the amount of groundwater pumped from each well located on the PROPERTY since January 1, 2000.

RESPONSE TO DEMAND NO. 11:

Responding party objects that this request is overbroad as to scope and time.

DEMAND FOR PRODUCTION NO. 12:

All Notices of Groundwater Extraction and Diversion ("NOTICES") filed with the State Water Resources Control Board ("SWRCB") or any regional office for the PROPERTY.

RESPONSE TO DEMAND NO. 12:

Responding party objects that this request is overbroad as to time. This request seeks information that is not relevant to the subject matter of the litigation, and this request is not reasonably calculated to lead to the discovery of admissible evidence.

DEMAND FOR PRODUCTION NO. 13:

All COMMUNICATIONS with the SWRCB RELATING TO groundwater extraction for the PROPERTY.

RESPONSE TO DEMAND NO. 13:

Responding party objects that this request is overbroad as to time. This request seeks information that is not relevant to the subject matter of the litigation, and this request is not reasonably calculated to lead to the discovery of admissible evidence.

DEMAND FOR PRODUCTION NO. 14:

ALL DOCUMENTS RELATING TO the amount of electrical power used on the PROPERTY or any part thereof, since January 1, 2000, including all invoices and billing records, pump tests, and the like.

RESPONSE TO DEMAND NO. 14:

Responding party objects that this request is so overbroad as to scope and time as to be burdensome and harassing. This request seeks information that is not relevant to the subject matter of the litigation, and this request is not reasonably calculated to lead to the discovery of admissible evidence. This request invades responding party's right to privacy.

DEMAND FOR PRODUCTION NO. 15:

All DOCUMENTS evidencing communications with Southern California Edison RELATING TO the PROPERTY or any part thereof.

RESPONSE TO DEMAND NO. 15:

Responding party objects that this request is so overbroad as to scope and time as to be burdensome and harassing. This request seeks information that is not relevant to the subject matter of the litigation, and this request is not reasonably calculated to lead to the discovery of admissible evidence. This request invades responding party's right to privacy.

DEMAND FOR PRODUCTION NO. 16:

All DOCUMENTS evidencing any pump test performed on the wells on the PROPERTY or any part thereof.

RESPONSE TO DEMAND NO. 16:

Responding party objects that this request is overbroad as to time.

DEMAND FOR PRODUCTION NO. 17:

All DOCUMENTS evidencing the lease of the PROPERTY or any part thereof.

RESPONSE TO DEMAND NO. 17:

Responding party objects that this request is overbroad as to scope and time. This request seeks information that is not relevant to the subject matter of the litigation, and this request is not reasonably calculated to lead to the discovery of admissible evidence. This request invades responding party's right to privacy.

DEMAND FOR PRODUCTION NO. 18:

All DOCUMENTS evidencing the lease of any land adjacent to the PROPERTY or any part thereof since January 1, 2000.

RESPONSE TO DEMAND NO. 18:

Responding party objects that this request is overbroad as to scope and time. This request seeks information that is not relevant to the subject matter of the litigation, and this request is not reasonably calculated to lead to the discovery of admissible evidence. This request invades responding party's right to privacy.

DEMAND FOR PRODUCTION NO. 19:

All DOCUMENTS evidencing the amount of groundwater applied to each parcel of PROPERTY since January 1, 2000.

RESPONSE TO DEMAND NO. 19:

Responding party objects that this request vague and ambiguous with respect to the term “the amount of groundwater applied to each parcel.” Responding party objects that this request is overbroad as to time. This request seeks documents that are publicly available and thus equally available to propounding party.

Dated: August 11, 2022

MATHENY SEARS LINKERT & JAIME, LLP

By: 

NICHOLAS R. SHEPARD, ESQ.,
Attorney for Defendants, JOHNNY
ZAMRZLA, PAMELLA ZAMRZLA,
JOHNNY LEE ZAMRZLA AND
JEANETTE ZAMRZLA (collectively
“ZAMRZLA’S”)

PROOF OF SERVICE
[Code Civ. Proc. §§ 1011, 1013, 1013(a)(3) & 2015.5]

ANTELOPE VALLEY GROUNDWATER CASES
Case No. 1-05-CV-049053 (For filing purposes only)
JCCP 4408

(STATE OF CALIFORNIA, COUNTY OF SACRAMENTO)

I am a resident of the United States and employed in Sacramento County. I am over the age of eighteen years and not a party to the within entitled action. My business address is 3638 American River Drive, Sacramento, California.

On August 11, 2022, I served the following documents on the parties in this action described as follows:

OBJECTION TO AMENDED NOTICE OF TAKING DEPOSITION OF PAMELLA ZAMRZLA

☒ **BY ELECTRONIC SERVICE:** by posting the document(s) listed above to the Antelope Valley Groundwater Cases to all parties listed on the Santa Clara Superior Court Service List as maintained via Glotrans. Electronic service completed through <http://www.avwatermaster.org>.

☐ **BY OVERNIGHT MAIL:** by causing document(s) to be picked up by an overnight delivery service company for delivery to the address(es) on the next business day.

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

Executed on this 11th day of August 2022, at Sacramento, California.


Kym Green