# EXHIBIT 1

Special Interrogatories	LAC Waterworks Dist 40 (Best, Best & Krieger)	Rosamond Comm Serv Dist (Best, Best & Krieger)		_	, ,	Palmdale Water Dist (Lagerloff, Senecal)	,	City of Lancaster (Luce Forward)	City of Palmdale (Richards, Watson)
State the date when YOU started pumping water from Basin. (pumping)	= 1	since 1966	since approximately 1890	since approximately 1959	since 1954 or earlier	since 1918	Prior to 1965	Attorney Work-Product/Client Privilege; requires compilation; will produce at a mutually convenient time docs if not equally or more easily available to propounding party.	Palmdale has never pumped water from the basin.
State by month and year, quantity of groundwater have pumped from from ewell that YOU have operathe Basin during the RELEVANT PERIOD.  2 (pumping)	/OU pach	District maintains records showing quantity of groundwater pumped; compilation of District's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; response may be ascertained from Exhibit 1	compilation of LCID's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; a response may be	PRID maintains records showing quantity of groundwater pumped by PRID; compilation of PRID's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; a response may be ascertained from records in PRID's possession which will be produced for inspection and copying at a reasonable time.		District maintains records showing quantity of groundwater pumped; compilation of District's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; response may be ascertained from Exhibit 1	Company maintains records showing quantity of groundwater pumped; compilation of Company's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; response may be ascertained from Exhibit 1	Privilege; requires compilation; will produce at a mutually convenient time docs if not	Palmdale has never pumped water from the basin.
	water, have	District maintains records showing quantity of water purchased from AV-East Kern Water Agency; compilation of District's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; response may be ascertained from Exhibit 1	LCID maintains records showing quantity of water purchased from AV-East Kern Water Agency; compilation of LCID's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; a response may be ascertained from records in LCID's possession which will be produced for inspection and copying at a reasonable time.	interrogating party; a response may be ascertained from records in PRID's possession which will be produced for	District maintains records showing quantity of water purchased from AV-East Kern Water Agency; compilation of District's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; response may be ascertained from Exhibit 2	District does not purchase water from AV-East Kern Water Agency but imports from State Water Project; compilation of District's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; response may be ascertained from Exhibit 2	Company maintains records showing quantity of water purchased from AV-East Kern Water Agency; compilation of District's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; response may be ascertained from Exhibit 1; Company also purcahses from LAC Water No. 40 which is believed to be a mix of groundwater and AVEK water.	Not applicable.	Vaque: <b>Answer is "None</b> "

Special	LAC Waterworks Dist 40 (Best, Best & Krieger)	Rosamond Comm Serv Dist (Best, Best & Krieger)	•	Palm Ranch Irrig Dist (Lemieux & O'Neill)		Palmdale Water Dist (Lagerloff, Senecal)		City of Lancaster (Luce Forward)	City of Palmdale (Richards, Watson)
State by month and year, the average cost of water YOU have purchased from Antelope Valley-East Kern Water Agency for each year from 1990 to the present.	May be ascertained from payment records in District's possession; information is equally available to interrogating party from AV-East Kern Water Agency; District maintains records showing costs for water purchased from AV-East Kern Water Agency; expense for preparation would be substantially the same for interrogating party	"Avg. cost of water" is vague; information is equally available to interrogating party from AV-East Kern Water Agency; District maintains records showing costs for water purchased from AV-East Kern Water Agency; expense for preparation would be substantially the same for interrogating party.	"Avg. cost of water" is vague; Equally available to propounding party; LCID maintains records showing costs of water purchased from AV-East Kern Water Agency; compilation of LCID's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; a response may be ascertained from payment records in LCID's possession.	"Avg. cost of water" is vague; Equally available to propounding party; PRID maintains records showing costs of water purchased from AV-East Kern Water Agency; compilation of PRID's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; a response may be ascertained from payment records in PRID's possession.	East Kern Water Agency; District maintains records showing costs for water purchased from AV-East Kern	"Avg. cost of water" is vague; information is equally available to interrogating party from AV-East Kern Water Agency; District does not purchase water from AV-East Kern Water Agency but imports from State Water Project; expense for preparation would be substantially the same for interrogating party; response	Company maintains records showing quantity of water purchased from AV-East Kern Water Agency; compilation of District's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; response may be ascertained from Exhibit 1; Company also purcahses from LAC Water No. 40 which is believed to be a mix of groundwater and AVEK water; response may be ascertained from records in Company's possession.	Not applicable.	Palmdale has never pumped water from the basin.
pumping of groundwater from the Basin for the years 1990 to	District does not pump groundwater for non- municipal/non-industrial use.	Expert Witness; Attorney Work Product/Client Privilege; Vague as to identity of person pumping water for "non-municipal/non-industrial pumping of groundwater"; District does not pump groundwater for non-municipal/non-industrial use.	Expert Witness; Vague as to identity of person pumping water for "non-municipal/non-industrial pumping of groundwater"	Expert Witness; Vague as to identity of person pumping water for "non-municipal/non-industrial pumping of groundwater"	Expert Witness; Attorney Work Product/Client Privilege; Vague as to identity of person pumping water for "nonmunicipal/non-industrial pumping of groundwater"; District does not pump groundwater for nonmunicipal/non-industrial use.		Work product; AC Privilege; Expert witness; <b>Does not</b> <b>pump groundwater for non-</b> <b>municipal/non-industrial</b> <b>use.</b>	Attorney Work-Product/Client Privilege; requires compilation; will produce at a mutually convenient time docs if not equally or more easily available to propounding party; Expert witness	Palmdale has never pumped water from the basin.

	•	LAC Waterworks Dist 40 (Best, Best & Krieger)	Rosamond Comm Serv Dist (Best, Best & Krieger)	Littlerock Creek Irrig Dist (Lemieux & O'Neill)	_	Quartz Hill Water Dist (Lagerloff, Senecal)	Palmdale Water Dist (Lagerloff, Senecal)	•	City of Lancaster (Luce Forward)	City of Palmdale (Richards, Watson)
13	State the amount you contend to be the safe yield of the Basin for the years 1990 to the present as the term is used in paragraph 30 of your crosscomplaint. (safe yield)	Attorney Work-Product/Client Privilege; Expert Witness	Attorney Work-Product/Client Privilege; requires compilation; will produce at a mutually convenient time docs if not equally or more easily available to propounding party; Expert witness	Vague; FAC Par. 30 does not refer to "safe yield"; Joint defense privilegee; AC Privilege; Work product; Expert witness; may supplement when expert study is completed.						
6	State the amount or quantity of groundwater recharge to the Basin that YOU contend has been annually supplied from natural sources for each year from 1990 to date. (safe yield)		Attorney Work-Product/Client Privilege; Expert Witness	Attorney Work-Product/Client Privilege; requires compilation; will produce at a mutually convenient time docs if not equally or more easily available to propounding party; Expert witness	Vague as to "natural sources," "amount or quantity," and "recharge."; Expert witness; Work product; <i>may</i> supplement when expert study is completed.					
7	For each year from 1990 to the present state the amount or quantity of groundwater recharge to the Basin that YOU contend has been annually provided by any return flows from water that YOU have imported. (safe yield)	Attorney Work-Product/Client Privilege; Expert Witness	Attorney Work-Product/Client Privilege; requires compilation; will produce at a mutually convenient time docs if not equally or more easily available to propounding party; Expert witness	Vague as to "amount or quantity," and "recharge."; Expert witness; Work product; may supplement when expert study is completed.						
8	State the amount of groundwater recharge to the Basin that YOU contend has been annually provided by any return flows from agricultural uses for each year from 1990 to the present. (safe yield)	Attorney Work-Product/Client Privilege; Expert Witness	Attorney Work-Product/Client Privilege; requires compilation; will produce at a mutually convenient time docs if not equally or more easily available to propounding party; Expert witness	Vague as to "amount," "recharge" and agricultural uses."; Expert witness; Work product; may supplement when expert study is completed.						

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		LAC Waterworks Dist 40 (Best, Best & Krieger)	Rosamond Comm Serv Dist (Best, Best & Krieger)	`		Quartz Hill Water Dist (Lagerloff, Senecal)	Palmdale Water Dist (Lagerloff, Senecal)	Cal-Water (John Tootle)	City of Lancaster (Luce Forward)	City of Palmdale (Richards, Watson)
10	overdraft of the Basin.	Attorney Work-Product/Client Privilege; Expert Witness; <b>the</b> <b>basin has been in overdraft</b> <b>since at least 1946</b>	Attorney Work-Product/Client Privilege; Expert Witness; the basin has been in overdraft since at least 1946	Privilege; Expert Witness; <b>the basin has been in overdraft</b>	Attorney Work-Product/Client Privilege; Expert Witness; the basin has been in overdraft since at least 1946	Attorney Work-Product/Client Privilege; Expert Witness; the basin has been in overdraft since at least 1946	Attorney Work-Product/Client Privilege; Expert Witness; the basin has been in overdraft since at least 1946	Attorney Work-Product/Client Privilege; Expert Witness; the basin has been in overdraft since at least 1946	Attorney Work-Product/Client Privilege; requires compilation; will produce at a mutually convenient time docs if not equally or more easily available to propounding party; Expert witness	Vague; Joint defense privilegee; AC Privilege; Work product; Expert witness; <i>may</i> supplement when expert study is completed.
9	State each and every fact in support of your contention that "the Basin is and has been in an overdraft condition for more than five (5) consecutive years before the filing of this cross-complaint", as alleged in paragraph 29 of your Cross-Complaint. (overdraft)	Attorney Work-Product/Client Privilege; Expert Witness	Attorney Work-Product/Client Privilege; Expert Witness	,	Attorney Work-Product/Client Privilege; Expert Witness	Attorney Work-Product/Client Privilege; Expert Witness	Attorney Work-Product/Client Privilege; Expert Witness	Attorney Work-Product/Client Privilege; Expert Witness	Attorney Work-Product/Client Privilege; requires compilation; will produce at a mutually convenient time docs if not equally or more easily available to propounding party; Expert witness	Vague; FAC Par. 29 does not state "the Basin is and has been in overdraft";Joint defense privilegee; AC Privilege; Work product; Expert witness; may supplement when expert study is completed.
11	For each and every year since 1990 that you contend there was an overdraft of the Basin, state the amount of overdraft. (overdraft)	Attorney Work-Product/Client Privilege; Expert Witness	Attorney Work-Product/Client Privilege; Expert Witness	,	Attorney Work-Product/Client Privilege; Expert Witness	Attorney Work-Product/Client Privilege; Expert Witness	Attorney Work-Product/Client Privilege; Expert Witness	Attorney Work-Product/Client Privilege; Expert Witness	Attorney Work-Product/Client Privilege; requires compilation; will produce at a mutually convenient time docs if not equally or more easily available to propounding party; Expert witness	Vague as to "amount of overdraft"; Expert witness; Work product; <i>may</i> supplement when expert study is completed.
12	For each and every year that you contend there was an overdraft of the Basin, identify each and every person that you believe pumped	District does not have knowlegde to sufficiently respond; The District has made and will make these records available subject to the propounding party's agreement to honor confidentiality requests; County of LA has records of well permits issued; there are no records organized by any specific area including the Antelope Valley	District does not have knowlegde to sufficiently respond; The District has made and will make these records available subject to the propounding party's agreement to honor confidentiality requests; County of Kern has records of well permits issued; propounder has equal access to CADWR records and Kern County records; persons already identified as parties; burdensome and oppressive.	LCID does not have knowlegde to sufficiently respond after good faith inquiry to CADWR; LCID has records of certain groundwater pumping but propounders have equal CADWR access; "It" (DWR?, LCID?) has restricted access to records or confidentiality requirements regarding use;	PRID does not have knowlegde to sufficiently respond after good faith inquiry to CADWR; PRID has records of certain groundwater pumping but propounders have equal CADWR access; "It"	well permits issued; there are no records organized by any	District does not have knowlegde to sufficiently respond; The District has made and will make these records available subject to the propounding party's agreement to honor confidentiality requests; County of LA has records of well permits issued; there are no records organized by any specific area including the Antelope Valley; propounder has equal access to CADWR records and LA County Dept of Health records; persons already identified as parties; burdensome and oppressive.	Company does not have knowlegde to sufficiently respond; The Company has made and will make these records available subject to the propounding party's agreement to honor confidentiality requests; County of LA has records of well permits issued; there are no records organized by any specific area including the Antelope Valley; propounder has equal access to CADWR records and LA County records; persons already identified as parties; burdensome and oppressive.	will produce at a mutually convenient time docs if not	Burdensome; legal conclusion; Vague; Joint defense privilegee; AC Privilege; Work product; Expert witness; <i>may</i> supplement when expert study is completed.

Requests Served: May 29, 2008 Responses Served: July 14, 2008

	_	LAC Waterworks Dist 40 (Best, Best & Krieger)		•	Dist (Lemieux &	, <u> </u>	Palmdale Water Dist (Lagerloff, Senecal)	•	City of Lancaster (Luce Forward)	City of Palmdale (Richards, Watson)
14	state each and every fact in	⊤he District does not contend it has such rights except for County landscaping, park and other recreational uses.	Assuming request concerns overlying rights, District does not have rights except for landscaping, park and other recreational uses.	LCID as irrigation district has the same rights to water as the State of CA and its customers.	PRID as irrigation district has the same rights to water as the State of CA and its	Assuming request concerns overlying rights, District does not have rights except for landscaping of District property.	Assuming request concerns overlying rights, District does not have rights except for landscaping of District	Company has landscaping rights. FSR: Work Product; Company contends it has correlative overlying right. Overlying landowners within its certified service area transferred substantially all their groundwater rights to the Company or its legal predecessors-in-interest.	Burdensome and oppressive; outside scope; Per FAC Par. 3 Lancaster claims rights as an overlying user and claims a quantity reasonably necessary and avaialbel for municipal park purposes.	counld produce or use
	If YOU contend that YOU have any correlative rights to the use of groundwater in the Basin, state the quantity of such rights. (rights/priorities)	Attorney Work-Product; Expert witness; <b>the District uses a</b> <b>nominal amount of water</b> .	Attorney Work-Product; assuming overlying rights, the District uses a nominal amount of water.	complete; LCID as irrigation district has the same rights	Attorney Work- Product/Privilege; Expert Witness; has not been fully developed and may be answered when studies are complete; PRID as irrigation district has the same rights to water as the State of CA and its customers.	Attorney Work-Product; Expert witness; the District uses a nominal amount of water.		Attorney Work-Product; Expert witness; the Company uses a nominal amount of water. FSR: Work Product/Expert Witness; Company contends its correlative rights are equal to or greater than its historiacal groundwater pumping and equal to its correlative or pro-rata share of the groundwater basin's native safe yield, which overlyers are entitled.	Burdensome and oppressive; outside scope; Per FAC Par. 3 Lancaster claims rights as an overlying user and claims a quantity reasonably necessary and avaialbel for municipal park purposes.	Vague as to "quantity"'; The quantity of Plamdales' rights in Basin is not presently ascertainable because they are dormant.

Prepared by: David Watson

Requests Served: May 29, 2008 Responses Served: July 14, 2008

	_	LAC Waterworks Dist 40 (Best, Best & Krieger)			Dist (Lemieux &	` •	Palmdale Water Dist (Lagerloff, Senecal)	*	City of Lancaster (Luce Forward)	City of Palmdale (Richards, Watson)
16	If YOU contend that YOU have any appropriative rights to the use of groundwater in the Basin, state each and every	would be substantially the same for interrogating party;  District has pumped since 1921; Response may be	District maintains records showing quantity of groundwater pumped; Compilation is necessary; no	LCID's possession which will be produced for	substantially same for interrogating party; a response may be ascertained from records in PRID's possession which will be produced for	would be substantially the same for interrogating party; District has pumped since 1954; Response may be	Appropriative rights from District pumping since 1918; District maintains records showing quantity of groundwater pumped; Compilation is necessary; no such compilation exists; burden would be substantially the	Company maintains records showing quantity of groundwater pumped; compilation of Company's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; company has pumped since prior to 1965; response may be ascertained from Exhibit 1	Burdensome and oppressive; outside scope; Per FAC Par. 3 Lancaster claims rights as an overlying user and claims a quantity reasonably necessary and avaialbel for municipal park purposes.	to exercise appropriatiev
17	If YOU contend that YOU have any appropriative rights to the use of groundwater in the	would be substantially the same for interrogating party; District has pumped since 1921; Response may be	District maintains records showing quantity of groundwater pumped; Compilation is necessary; no		none exists; expense substantially same for interrogating party; a response may be ascertained from records in PRID's possession which will be produced for inspection and copying at a	same for interrogating party;  District has pumped since  1954; Response may be	District maintains records showing quantity of groundwater pumped; Compilation is necessary; no such compilation exists; burden would be substantially the	Company maintains records showing quantity of groundwater pumped; compilation of Company's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; not yet fully developed company has pumped since prior to 1965; response may be ascertained from Exhibit 1	Burdensome and oppressive; outside scope; Per FAC Par. 3 Lancaster claims rights as an overlying user and claims a quantity reasonably necessary and avaialbel for municipal park purposes.	Vague as to "quantity"; <b>The quantity of Plamdales' rights in Basin is not presently ascertainable because tPalmdale has not exercised.</b>

Prepared by: David Watson

Special Interrogatories	LAC Waterworks Dist 40 (Best, Best & Krieger)	Rosamond Comm Serv Dist (Best, Best & Krieger)		_	Quartz Hill Water Dist (Lagerloff, Senecal)	Palmdale Water Dist (Lagerloff, Senecal)	•	City of Lancaster (Luce Forward)	City of Palmdale (Richards, Watson)
If YOU contend that YOU has acquired prescriptive rights use groundwater within the Basin as against the Will Class, please state each arevery fact in support of you contention. (prescription)	d further supplement its	Does not seek info for Phase 2 trial; not relevant to Phase 2; District responds it has pumped groundwater from Basin since 1921 and Basin has been in overdraft since at least 1946; will further supplement its response at a reasonable time after the Phase 2 trial.		Does not seek info for Phase 2 trial; not relevant to Phase 2; testimony not yet fully developed; PRID responds it has pumped groundwater from Basin since approx. 1959 and has been in overdraft since at least 1946; will further supplement its response at a reasonable time after the Phase 2 trial.	Does not seek info for Phase 2 trial; not relevant to Phase 2; testimony not yet fully developed; District responds it has pumped groundwater from Basin since 1954 and Basin has been in overdraft since at least 1946; will further supplement its response at a reasonable time after the Phase 2 trial.	Does not seek info for Phase 2 trial; not relevant to Phase 2;	Does not seek info for Phase 2 trial; not relevant to Phase 2; testimony not yet fully developed; Company responds it has pumped groundwater from Basin since prior to 1965 and Basin has been in overdraft since at least 1946; will further supplement its response at a reasonable time after the Phase 2 trial.	Burdensome and oppressive; outside scope; Per FAC Par. 3 Lancaster claims rights as an overlying user and claims a quantity reasonably necessary and avaialbel for municipal park purposes.	class rep has been
If YOU contend that YOU have any prescriptive rights to the use of groundwater in the Basin, state the quantity of such rights. (prescription)	Does not seek info for Phase 2 trial; not relevant to Phase 2; testimony not yet fully developed; District responds it has pumped groundwater from Basin since 1921 and Basin has been in overdraft since at least 1946; District has pumped groundwater in amounts shown in District records; c ompilation is necessary but does not exist; burden of expense substantially the same for interrogating party; may be ascertained from Exhibit 1; will further supplement its response at a reasonable time after the Phase 2 trial.	Does not seek info for Phase 2 trial; not relevant to Phase 2; District responds it has pumped groundwater from Basin since 1966 and Basin has been in overdraft since at least 1946; District has pumped groundwater in amounts shown in District records; compilation is necessary but does not exist; burden of expense substantially the same for interrogating party; may be ascertained from Exhibit 1; will further supplement its response at a reasonable time after the Phase 2 trial.	trial; not relevant to Phase 2; testimony not yet fully developed; LCID responds it has pumped groundwater from Basin since approx.  1890 and has been in overdraft since at least 1946; compilation is necessary but does not exist; burden of expense substantially the same for interrogating party; a response may be	Does not seek info for Phase 2 trial; not relevant to Phase 2; testimony not yet fully developed; <i>PRID responds it has pumped groundwater from Basin since approx.</i> 1959 and has been in overdraft since at least 1946; compilation is necessary but does not exist; burden of expense substantially the same for interrogating party; a response may be ascertained from records in <i>PRID's possession which will be produced for inspection and copying at a reasonbale time; will further supplement its response at a reasonable time after the Phase 2 trial.</i>	Does not seek info for Phase 2 trial; not relevant to Phase 2; testimony not yet fully developed; District responds it has pumped groundwater from Basin since 1954 and Basin has been in overdraft since at least 1946; District	Does not seek info for Phase 2 trial; not relevant to Phase 2; District responds it has pumped groundwater from Basin since 1918 and Basin has been in overdraft since at least 1946; response may be ascertained from Exhibit 1; will further supplement its response at a reasonable time after the Phase 2 trial.	Does not seek info for Phase 2 trial; not relevant to Phase 2; testimony not yet fully developed; Company responds it has pumped groundwater from Basin since prior to 1965 and Basin has been in overdraft since at least 1946; may be ascertained from Exhibit 1; will further supplement its response at a reasonable time after the Phase 2 trial.	Burdensome and oppressive; outside scope; Per FAC Par. 3 Lancaster claims rights as an overlying user and claims a quantity reasonably necessary and avaialbel for municipal park purposes.	class rep has been

	-	LAC Waterworks Dist 40 (Best, Best & Krieger)	Rosamond Comm Serv Dist (Best, Best & Krieger)	•	Dist (Lemieux &	, ,	Palmdale Water Dist (Lagerloff, Senecal)	•	City of Lancaster (Luce Forward)	City of Palmdale (Richards, Watson)
20	If YOU contend that YOU have acquired a prescriptive right to use groundwater within the	Does not seek info for Phase 2 trial; not relevant to Phase 2; testimony not yet fully developed; District responds it has pumped groundwater from Basin since 1921 and Basin has been in overdraft since at least 1946; will further supplement its response at a reasonable time after the Phase 2 trial; District first acquired pescriptive right five years after pumping groundwater from the basin in its overdraft condition the right has continued and continues to present time.	Does not seek info for Phase 2 trial; not relevant to Phase 2; District responds it has pumped groundwater from Basin since 1966 and Basin has been in overdraft since at least 1946; will further supplement its response at a reasonable time after the Phase 2 trial; District first acquired pescriptive right five years after pumping groundwater from the basin in its overdraft condition, the right has continued and continues to present time.	Does not seek info for Phase 2 trial; not relevant to Phase 2; testimony not yet fully developed; LCID responds it has pumped groundwater from Basin since approx. 1890 and has been in overdraft since at least 1946; will further supplement its response at a reasonable time after the Phase 2 trial; LCID first acquired prescriptive right 5 years after pumping groundwater from Basin in overdraft, the right has continued and does continue to present.	has pumped groundwater from Basin since approx. 1959 and has been in	no later, the right has	Does not seek info for Phase 2 trial; not relevant to Phase 2; District responds it has pumped groundwater from Basin since 1918 and Basin has been in overdraft since at least 1946; will further supplement its response at a reasonable time after the Phase 2 trial; District first acquired pescriptive right five years after pumping groundwater from the basin in its overdraft condition, the right has continued and continues to present time.	Does not seek info for Phase 2 trial; not relevant to Phase 2; testimony not yet fully developed; Company responds it has pumped groundwater from Basin since prior to 1965 and Basin has been in overdraft since at least 1946; will further supplement its response at a reasonable time after the Phase 2 trial; Company first acquired after pumping Basin for 5 years in overdraft.	Burdensome and oppressive; outside scope; Per FAC Par. 3 Lancaster claims rights as an overlying user and claims a quantity reasonably necessary and avaialbel for municipal park purposes.	Palmdale does not contend it has acquired prescriptive rights within the Basin.
21	If YOU contend that YOU have any prescriptive rights to the use of groundwater in the Basin, state when the five year prescriptive period	Does not seek info for Phase 2 trial; not relevant to Phase 2; testimony not yet fully developed; District responds it has pumped groundwater from Basin since 1921 and Basin has been in overdraft since at least 1946; will further supplement its response at a reasonable time after the Phase 2 trial; District first acquired pescriptive right five years after pumping groundwater from the basin in its overdraft condition which is no later ???, the right has continued and continues to present time.	Does not seek info for Phase 2 trial; not relevant to Phase 2; District responds it has pumped groundwater from Basin since 1966 and Basin has been in overdraft since at least 1946; will further supplement its response at a reasonable time after the Phase 2 trial; District first acquired pescriptive right five years after pumping groundwater from the basin in its overdraft condition, the right has continued and continues to present time.	Does not seek info for Phase 2 trial; not relevant to Phase 2; testimony not yet fully developed; LCID responds it has pumped groundwater from Basin since approx. 1890 and has been in overdraft since at least 1946; will further supplement its response at a reasonable time after the Phase 2 trial; LCID first acquired prescriptive right 5 years after pumping groundwater from Basin in overdraft, the right has continued and does continue to present.	trial; not relevant to Phase 2; testimony not yet fully developed; PRID responds it has pumped groundwater from Basin since approx. 1959 and has been in	after pumping groundwater from the basin in its	Does not seek info for Phase 2 trial; not relevant to Phase 2; District responds it has pumped groundwater from Basin since 1918 and Basin has been in overdraft since at least 1946; will further supplement its response at a reasonable time after the Phase 2 trial; District first acquired pescriptive right five years after pumping groundwater from the basin in its overdraft condition which is no lateer than 1951, the right has continued and continues to present time.	Does not seek info for Phase 2 trial; not relevant to Phase 2; testimony not yet fully developed; Company responds it has pumped groundwater from Basin since prior to 1965 and Basin has been in overdraft since at least 1946; will further supplement its response at a reasonable time after the Phase 2 trial; Company first acquired after pumping Basin for 5 years in overdraft.	Burdensome and oppressive; outside scope; Per FAC Par. 3 Lancaster claims rights as an overlying user and claims a quantity reasonably necessary and avaialbel for municipal park purposes.	Palmdale does not contend it has acquired prescriptive rights within the Basin.

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	Special	LAC Waterworks Dist 40 (Best, Best & Krieger)	Rosamond Comm Serv Dist (Best, Best & Krieger)	1			Palmdale Water Dist (Lagerloff, Senecal)	•	City of Lancaster (Luce Forward)	City of Palmdale (Richards, Watson)
27	State each and every fact in support of your contention that YOU have pumped or used groundwater from the Basin in an "open" manner as alleged in	preparing compilation substantially same for	Does not seek info for Phase 2 trial; not relevant to Phase 2; District responds it has pumped groundwater for municipal and industrial purposes and maintains records of those quantities; compilation is necessary and none exists; expense of preparing compilation substantially same for interrogating party; response may be ascertained from Exhibit 1.	Does not seek info for Phase 2 trial; not relevant to Phase 2; testimony not yet fully developed; LCID maintains records showing quantity of groundwater pumped for municipal and industrial uses; compilation of LCID's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; a response may be ascertained from records in LCID's possession which will be produced for inspection and copying at a reasonable time and location; LCID pumps groundwater for customers muni and industrial uses.	Does not seek info for Phase 2 trial; not relevant to Phase 2; testimony not yet fully developed; PRID maintains records showing quantity of groundwater pumped for municipal and industrial uses; compilation of PRID's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; a response may be ascertained from records in PRID's possession which will be produced for inspection and copying at a reasonable time and location; PRID pumps groundwater for customers muni and industrial uses.	Does not seek info for Phase 2 trial; not reasonably calculated to lead to admissible evidence for Phase 2 trial; Court has directed parties to focus dicovery requests upon Phase 2 matters; subject of testimony which has not yet been fully developed.	Does not seek info for Phase 2 trial; not reasonably calculated to lead to admissible evidence for Phase 2 trial; Court has directed parties to focus dicovery requests upon Phase 2 matters; subject of testimony	for interrogating party; response may be	Burdensome and oppressive; outside scope; Per FAC Par. 3 Lancaster claims rights as an overlying user and claims a quantity reasonably necessary and avaialbel for municipal park purposes.	Objections; <i>Palmdale has</i> never pumped from the Basin.
28	State each and every fact in support of your contention that you have pumped or used groundwater from the Basin in a "notorious" manner as alleged in paragraph 37 of your cross-complaint.	necessary and none exists; expense of preparing compilation substantially same		Does not seek info for Phase 2 trial; not relevant to Phase 2; testimony not yet fully developed; LCID maintains records showing quantity of groundwater pumped for municipal and industrial uses; compilation of LCID's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; a response may be ascertained from records in LCID's possession which will be produced for inspection and copying at a reasonable time and location; LCID pumps groundwater for customers muni and industrial uses.	Does not seek info for Phase 2 testimony not yet fully developed; PRID maintains records showing quantity of groundwater pumped for municipal and industrial uses; compilation of PRID's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; a response may be ascertained from records in PRID's possession which will be produced for inspection and copying at a reasonable time and location; PRID pumps groundwater for customers muni and industrial uses.	Does not seek info for Phase 2 trial; not reasonably calculated to lead to admissible evidence for Phase 2 trial; Court has directed parties to focus dicovery requests upon Phase 2 matters; subject of testimony which has not yet been fully developed.	Does not seek info for Phase 2 trial; not reasonably calculated to lead to admissible evidence for Phase 2 trial; Court has directed parties to focus dicovery requests upon Phase 2 matters; subject of testimony which has not yet been fully	for interrogating party; response may be	Burdensome and oppressive; outside scope; Per FAC Par. 3 Lancaster claims rights as an overlying user and claims a quantity reasonably necessary and avaialbel for municipal park purposes.	Objections; <i>Palmdale has</i> never pumped from the Basin.

	-	LAC Waterworks Dist 40 (Best, Best & Krieger)	Rosamond Comm Serv Dist (Best, Best & Krieger)	Littlerock Creek Irrig Dist (Lemieux & O'Neill)	Dist (Lemieux &	, ,	Palmdale Water Dist (Lagerloff, Senecal)	•	City of Lancaster (Luce Forward)	City of Palmdale (Richards, Watson)
s Y w "( ir	state each and every fact in upport of your contention that 'OU have pumped or used vater from the Basin in an exclusive" manner as alleged n paragraph 37 of your cross-	Does not seek info for Phase 2 trial; not reasonably calculated to lead to admissible evidence for Phase 2 trial; <i>District responds it has pumped groundwater for municipal and industrial purposes and maintains records of those quantities;</i> compilation is necessary and none exist; expense of preparing compilation substantially same for interrogating party; <i>response may be</i>	Does not seek info for Phase 2 trial; not reasonably calculated to lead to admissible evidence for Phase 2 trial; District responds it has pumped groundwater for municipal and industrial purposes and maintains records of those quantities; compilation is necessary and none exists; expense of preparing compilation substantially same for interrogating party; response may be ascertained from Exhibit 1; it pumps to supply water to its customers for muni and	trial; not relevant to Phase 2; testimony not yet fully developed; LCID maintains records showing quantity of groundwater pumped for municipal and industrial uses; compilation of LCID's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; a response may be ascertained from records in LCID's possession which will be produced for inspection and copying at a reasonable time and location; LCID pumps groundwater for customers	ascertained from records in PRID's possession which will be produced for inspection and copying at a reasonable time and location; PRID pumps groundwater for customers	Does not seek info for Phase 2 trial; not reasonably calculated to lead to admissible evidence for Phase 2 trial; Court has directed parties to focus dicovery requests upon Phase 2 matters; subject of testimony which has not yet been fully	Does not seek info for Phase 2 trial; not reasonably calculated to lead to admissible evidence for Phase 2 trial; Court has directed parties to focus dicovery requests upon Phase 2 matters; subject of testimony which has not yet been fully	Does not seek info for Phase 2 trial; not reasonably calculated to lead to admissible evidence for Phase 2 trial; Company responds it has pumped groundwater for municipal and industrial purposes and maintains records of those quantities; compilation is necessary and none exists; expense of preparing compilation substantially same for interrogating party; response may be ascertained from Exhibit 1; it pumps to supply water to its customers for muni and	Burdensome and oppressive; outside scope; Per FAC Par. 3 Lancaster claims rights as an overlying user and claims a quantity reasonably necessary and avaialbel for	Objections; Palmdale has never pumped from the
S S Y W W " O	state each and every fact in upport of your contention that OU have pumped or used vater from the Basin in a continuous" manner as lleged in paragraph 37 of your ross-complaint.	necessary and none exists; expense of preparing compilation substantially same	Does not seek info for Phase 2 trial; not reasonably calculated to lead to admissible evidence for Phase 2 trial; District responds it has pumped groundwater for municipal and industrial purposes and maintains records of those quantities; ;compilation is necessary and none exists; expense of preparing compilation substantially same for interrogating party; response may be ascertained from Exhibit 1; it pumps to supply water to its customers for muni and industrial uses.	muni and industrial uses.  Does not seek info for Phase 2 trial; not relevant to Phase 2; testimony not yet fully developed; LCID maintains records showing quantity of groundwater pumped for municipal and industrial uses; compilation of LCID's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; a response may be ascertained from records in LCID's possession which will be produced for inspection and copying at a reasonable time and location; LCID pumps groundwater for customers muni and industrial uses.	PRID's possession which will be produced for inspection and copying at a reasonable time and	Does not seek info for Phase 2 trial; not reasonably calculated to lead to admissible evidence for Phase 2 trial; Court has directed parties to focus dicovery requests upon Phase 2 matters; subject of testimony which has not yet been fully developed.		Does not seek info for Phase 2 trial; not reasonably calculated to lead to admissible evidence for Phase 2 trial; Company responds it has pumped groundwater for municipal and industrial purposes and maintains records of those quantities; compilation is necessary and none exists; expense of preparing compilation substantially same for interrogating party; response may be ascertained from Exhibit 1; it pumps to supply water to its customers for muni and industrial uses.	Burdensome and oppressive; outside scope; Per FAC Par. 3 Lancaster claims rights as an overlying user and claims a quantity reasonably necessary and avaialbel for municipal park purposes.	

	Special	LAC Waterworks Dist 40 (Best, Best & Krieger)	• •	•	Dist (Lemieux &	, ,	Palmdale Water Dist (Lagerloff, Senecal)	•	City of Lancaster (Luce Forward)	City of Palmdale (Richards, Watson)
				Does not seek info for Phase 2	Does not seek info for Phase 2					
					trial; not relevant to Phase 2;					
				testimony not yet fully	testimony not yet fully					
				developed; LCID maintains	developed; PRID maintains			Does not seek info for Phase 2		
					records showing quantity of			trial; not reasonably calculated		
					groundwater pumped for			to lead to admissible evidence		
		Does not seek info for Phase 2		municipal and industrial	municipal and industrial			for Phase 2 trial; Company		
		trial; not reasonably calculated to lead to admissible evidence		uses; compilation of LCID's	uses; compilation of PRID's records is necessary and none			responds it has pumped		
		for Phase 2 trial: <b>District</b>	to lead to admissible evidence for Phase 2 trial: <b>District</b>		exists; expense of preparing			groundwater for municipal		
		responds it has pumped			compilation substantially same			and industrial purposes and maintains records of those		
		groundwater for municipal	responds it has pumped groundwater for municipal	for interrogating party; <b>a</b>	for interrogating party; <b>a</b>			quantities; compilation is		
		and industrial purposes and	and industrial purposes and	response may be		Does not seek info for Phase 2		necessary and none exists;		
		maintains records of those	maintains records of those	-	• •	trial; not reasonably calculated		expense of preparing		
	support of your contention that		quantities; compilation is						Burdensome and oppressive;	
	YOU have pumped or used		necessary and none exists;	will be produced for	•			for interrogating party;	outside scope; Per FAC Par. 3	
	water from the Basin in an		expense of preparing		•	*		response may be	Lancaster claims rights as	
		compilation substantially same	compilation substantially same	reasonable time and	, ,, ,			, .	an overlying user and claims	
	alleged in paragraph 37 of your		for interrogating party;	location; LCID pumps	location; PRID pumps	2 matters; subject of testimony		pumps to supply water to its	, ,	Objections; Palmdale has
		response may be	response may be			which has not yet been fully	which has not yet been fully	customers for muni and		never pumped from the
31	(prescription)	ascertained from Exhibit 1	ascertained from Exhibit 1.	muni and industrial uses.	muni and industrial uses.	developed.	developed.	industrial uses.	municipal park purposes.	Basin.

		LAC Waterworks Dist 40 (Best, Best & Krieger)			Dist (Lemieux &	Quartz Hill Water Dist (Lagerloff, Senecal)	Palmdale Water Dist (Lagerloff, Senecal)	<b>`</b>	City of Lancaster (Luce Forward)	City of Palmdale (Richards, Watson)
38	If YOU contend that YOU have filed a Notice of Extraction as required by California Water Code sections 4999 to 5009 for each year since 1955 that you have extracted more than 25 acre-feet of groundwater from	trial; not relevant to Phase 2; info requested is equally available to propounding party from the State of CA; compilation of District's records is necessary and none exists; expense of preparing	Does not seek info for Phase 2 trial; not relevant to Phase 2; info requested is equally available to propounding party from the State of CA; compilation of District's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; a response may be ascertained from records in District's possession which will be produced for inspection and copying at a reasonable time.	trial; not relevant to Phase 2; info requested is equally available to propounding party from the State of CA; compilation of District's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; a response may be	Does not seek info for Phase 2 trial; not relevant to Phase 2; info requested is equally available to propounding party from the State of CA; compilation of District's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; a response may be ascertained from records in PRID's possession which will be produced for inspection and copying at a reasonable time and location;			Does not seek info for Phase 2 trial; not relevant to Phase 2;info requested is equally available to propounding party from the State of CA; compilation of Company's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; a response may be ascertained from records in Company's possession which will be produced for inspection and copying at a reasonable time.	Lancaster is currently investigating whether it so contends; Lancaster will supplement when further info is obtained.	Palmdale has never filed because it has never extracted;
39	If YOU contend that YOU have filed a Notice of Extraction as required by California Water Code sections 4999 to 5009 for each year since 1955 that you have	Does not seek info for Phase 2 trial; not relevant to Phase 2; info requested is equally available to propounding party from the State of CA; compilation of District's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; a response may be ascertained from records in District's possession which will be produced for inspection and copying at a reasonable time.	Does not seek info for Phase 2 trial; not relevant to Phase 2; info requested is equally available to propounding party from the State of CA; compilation of District's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; a response may be ascertained from records in District's possession which will be produced for inspection and copying at a reasonable time.	trial; not relevant to Phase 2; info requested is equally available to propounding party from the State of CA; compilation of District's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; a response may be	Does not seek info for Phase 2 trial; not relevant to Phase 2; info requested is equally available to propounding party from the State of CA; compilation of District's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; a response may be ascertained from records in PRID's possession which will be produced for inspection and copying at a reasonable time and location;	Notice of Extraction filed by District; will produce as		Does not seek info for Phase 2 trial; not relevant to Phase 2; info requested is equally available to propounding party from the State of CA; compilation of Company's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; a response may be ascertained from records in Company's possession which will be produced for inspection and copying at a reasonable time.	Lancaster is currently investigating whether it so contends; Lancaster will supplement when further info is obtained.	Palmdale has never filed because it has never extracted;

	II -	LAC Waterworks Dist 40 (Best, Best & Krieger)	Rosamond Comm Serv Dist (Best, Best & Krieger)		_	, ,	Palmdale Water Dist (Lagerloff, Senecal)	Cal-Water (John Tootle)	City of Lancaster (Luce Forward)	City of Palmdale (Richards, Watson)
32	If YOU contend that any property owner in the Willis Class had actual notice that your use of the groundwater was adverse to their right to use the groundwater underlying their property, please identify each and every such property owner. (actual notice)	Does not seek info for Phase 2 trial; not relevant to Phase 2; Court has directed parties to focus dicovery requests upon Phase 2 matters.	Does not seek info for Phase 2 trial; not relevant to Phase 2; Court has directed parties to focus dicovery requests upon Phase 2 matters.	trial; not relevant to Phase	Does not seek info for Phase 2 trial; not relevant to Phase 2; Court has directed parties to focus dicovery requests upon Phase 2 matters.	Does not seek info for Phase 2 trial; not relevant to Phase 2; Court has directed parties to focus dicovery requests upon Phase 2 matters; subject of testimony which has not yet been fully developed.	Does not seek info for Phase 2 trial; not relevant to Phase 2; Court has directed parties to focus dicovery requests upon Phase 2 matters; subject of testimony which has not yet been fully developed.	Does not seek info for Phase 2 trial; not relevant to Phase 2; Court has directed parties to focus dicovery requests upon Phase 2 matters; subject of testimony which has not yet been fully developed.	Burdensome and oppressive; outside scope; Per FAC Par. 3 Lancaster claims rights as an overlying user and claims a quantity reasonably necessary and avaialbel for municipal park purposes.	Objections; <b>Not applicable.</b>
33	If YOU contend that any property owner in the Willis Class had actual notice that your use of the groundwater was adverse to their right to use the groundwater underlying their property, please state	trial; not reasonably calculated to lead to admissible evidence for Phase 2 trial; District responds it has pumped groundwater for municipal and industrial purposes and maintains records of those quantities; compilation is necessary and none exists;		trial; not relevant to Phase 2; testimony not yet fully developed; LCID maintains records showing quantity of groundwater pumped for municipal and industrial uses; compilation of LCID's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; a response may be	Does not seek info for Phase 2 trial; not relevant to Phase 2; testimony not yet fully developed; PRID maintains records showing quantity of groundwater pumped for municipal and industrial uses; compilation of PRID's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; a response may be ascertained from records in PRID's possession which will be produced for inspection and copying at a reasonable time and location	Does not seek info for Phase 2 trial; not relevant to Phase 2; Court has directed parties to focus dicovery requests upon Phase 2 matters; subject of testimony which has not yet been fully developed; District responds it has pumped groundwater for municipal and industrial purposes and maintains records of those quantities; compilation is necessary and none exists; expense of preparing compilation substantially same for interrogating party; response may be ascertained from Exhibit 1	Does not seek info for Phase 2 trial; not relevant to Phase 2; District responds it has pumped groundwater for municipal and industrial purposes and maintains records of those quantities; compilation is necessary and none exists; expense of preparing compilation substantially same for interrogating party; response may be ascertained from Exhibit 1	Does not seek info for Phase 2 trial; not relevant to Phase 2; Company responds it has pumped groundwater for municipal and industrial purposes and maintains records of those quantities; compilation is necessary and none exists; expense of preparing compilation substantially same for interrogating party; response may be ascertained from Exhibit 1; it pumps to supply water to its customers for muni and industrial uses.	Burdensome and oppressive; outside scope; Per FAC Par. 3 Lancaster claims rights as an overlying user and claims a quantity reasonably necessary and avaialbel for municipal park purposes.	Objections; <i>Not applicable</i> .
24	If YOU contend that any property owner in the Willis Class had actual notice that your use of the groundwater was adverse to their right to use the groundwater underlying their property, please describe each WRITING which supports that contention. (actual	compilation substantially same		trial; not relevant to Phase 2; testimony not yet fully developed; LCID maintains records showing quantity of groundwater pumped for municipal and industrial uses; compilation of LCID's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; a response may be	PRID's possession which will be produced for	Does not seek info for Phase 2 trial; not reasonably calculated to lead to admissible evidence for Phase 2 trial; Court has directed parties to focus dicovery requests upon Phase 2 matters; subject of testimony which has not yet been fully developed.		Does not seek info for Phase 2 trial; not reasonably calculated to lead to admissible evidence for Phase 2 trial; Company responds it has pumped groundwater for municipal and industrial purposes and maintains records of those quantities; compilation is necessary and none exists; expense of preparing compilation substantially same for interrogating party; response may be ascertained from Exhibit 1; it pumps to supply water to its customers for muni and industrial uses.	Burdensome and oppressive; outside scope; Per FAC Par. 3 Lancaster claims rights as an overlying user and claims a quantity reasonably necessary and avaialbel for municipal park purposes.	Objections: <b>Not applicable.</b>

		LAC Waterworks	Rosamond Comm	Littlerock Creek Irrig	Palm Ranch Irrig	Quartz Hill Water				City of Palmdale
	Cracial			_	_	-,	Dolm dolo Water Diet	Cal Water / Jahr	City of Lancaster	
	-	Dist 40 (Best, Best &		Dist (Lemieux &			Palmdale Water Dist	•	City of Lancaster	(Richards,
	Interrogatories	Krieger)	Best & Krieger)	O'Neill)	O'Neill)	Senecal)	(Lagerloff, Senecal)	Tootle)	(Luce Forward)	Watson)
				Does not seek info for Phase 2	Does not seek info for Phase 2					
				trial; not relevant to Phase 2;	trial; not relevant to Phase 2;			Does not seek info for Phase 2		
				testimony not yet fully	testimony not yet fully			trial; not reasonably calculated		
				developed; LCID maintains	developed; PRID maintains			to lead to admissible evidence		
		Does not seek info for Phase 2	Does not seek info for Phase 2	records showing quantity of	records showing quantity of			for Phase 2 trial; Company		
		trial; not reasonably calculated	trial; not reasonably calculated	groundwater pumped for	groundwater pumped for			responds it has pumped		
		to lead to admissible evidence	to lead to admissible evidence	municipal and industrial	municipal and industrial			groundwater for municipal		
		for Phase 2 trial; <i>District</i>	for Phase 2 trial; <b>District</b>	uses; compilation necessary	uses; compilation necessary			and industrial purposes and		
		responds it maintains	responds it has pumped	and none exists; expense of	and none exists; expense of			maintains records of those		
	,	records of groundwater	groundwater for municipal	preparing compilation	preparing compilation			quantities; compilation is		
	1 1 2	quantities pumped for	and industrial purposes and	substantially same for		Does not seek info for Phase 2		necessary and none exists;		
	Class had constructive notice	-	maintains records of those	interrogating party; a	interrogating party; a	trial; not reasonably calculated	trial; not reasonably calculated	expense of preparing	Burdenseme ord correction	
	,	purposes; compilation is	quantities; compilation is	response may be	response may be	to lead to admissible evidence	to lead to admissible evidence	compilation substantially same	Burdensome and oppressive;	
	groundwater was adverse to	necessary and none exists;	necessary and none exists;	ascertained from records in LCID's possession which	ascertained from records in PRID's possession which	for Phase 2 trial; Court has		for interrogating party; response may be	outside scope; Per FAC Par. 3 Lancaster claims rights as	
		expense of preparing	expense of preparing	will be produced for	will be produced for	directed parties to focus	directed parties to focus		an overlying user and claims	
	groundwater underlying their property, please identify each	compilation substantially same	compilation substantially same for interrogating party;	inspection and copying at a	•	dicovery requests upon Phase 2 matters; subject of testimony	dicovery requests upon Phase 2 matters; subject of testimony	pumps to supply water to its	an overlying user and claims	
	and every such property owner.	0 01 37	response may be	reasonable time and	reasonable time and	which has not yet been fully	which has not yet been fully	customers for muni and	necessary and avaialbel for	
35	(constructive notice)	ascertained from Exhibit 1	ascertained from Exhibit 1.	location.	location.	developed.	developed.	industrial uses.	municipal park purposes.	Objections; Not applicable.
33	(constructive notice)	ascertained from Exhibit 1	ascertained from Exhibit 1.			developed.	developed.	muusmar uses.	municipal park purposes.	Objections, Not applicable.
					Does not seek info for Phase 2					
				trial; not relevant to Phase 2;	trial; not relevant to Phase 2;			Does not seek info for Phase 2		
				testimony not yet fully	testimony not yet fully			trial; not reasonably calculated		
		Dana mat analy info for Dhann O	Dana and analy info for Phone 2	developed; LCID maintains	developed; PRID maintains records showing quantity of			to lead to admissible evidence for Phase 2 trial; <b>Company</b>		
				records showing quantity of groundwater pumped for	groundwater pumped for			responds it has pumped		
		trial; not reasonably calculated to lead to admissible evidence	trial; not reasonably calculated to lead to admissible evidence	municipal and industrial	municipal and industrial			groundwater for municipal		
		for Phase 2 trial; <b>District</b>	for Phase 2 trial; <b>District</b>	uses; compilation necessary	uses; compilation necessary			and industrial purposes and		
		responds it maintains	responds it has pumped	and none exists; expense of	and none exists; expense of			maintains records of those		
		records of groundwater	groundwater for municipal	preparing compilation	preparing compilation			quantities; compilation		
	Class had constructive notice	quantities pumped for	and industrial purposes and	substantially same for	substantially same for	Does not seek info for Phase 2	Does not seek into for Phase 2	necessary and none exists;		
		municipal and industial	maintains records of those	interrogating party; <b>a</b>		trial; not reasonably calculated	trial; not reasonably calculated	expense of preparing		
	groundwater was adverse to	purposes; compilation is	quantities; compilation is	response may be	response may be	to lead to admissible evidence	to lead to admissible evidence	compilation substantially same	Burdensome and oppressive;	
1	their right to use the	necessary and none exists;	necessary and none exists;	ascertained from records in	•	for Phase 2 trial; Court has		for interrogating party;	outside scope; Per FAC Par. 3	
	groundwater underlying their	expense of preparing	expense of preparing	LCID's possession which	PRID's possession which	directed parties to focus	directed parties to focus	response may be	Lancaster claims rights as	
		compilation substantially same	compilation substantially same	will be produced for	will be produced for	dicovery requests upon Phase	dicovery requests upon Phase		an overlying user and claims	
	and every fact in support of	for interrogating party;	for interrogating party;	inspection and copying at a	-	2 matters; subject of testimony	2 matters; subject of testimony	pumps to supply water to its	a quantity reasonably	
	your contention. (constructive	response may be	response may be	reasonable time and	reasonable time and	which has not yet been fully	which has not yet been fully	customers for muni and	necessary and avaialbel for	
36	notice)	ascertained from Exhibit 1	ascertained from Exhibit 1.	location;	location	developed.	developed.	industrial uses.	municipal park purposes.	Objections; Not applicable.
1	If YOU contend that any									
	property owner in the Willis									
	Class had constructive notice					Does not seek info for Phase 2				
	that your use of the					trial; not reasonably calculated	trial; not reasonably calculated		L	
	groundwater was adverse to			Does not seek info for Phase 2			to lead to admissible evidence	Does not seek info for Phase 2		
1	· ·	trial; not reasonably calculated	,	,	,		for Phase 2 trial; Court has	trial; not reasonably calculated	outside scope; Per FAC Par. 3	
1		to lead to admissible evidence	to lead to admissible evidence		to lead to admissible evidence	directed parties to focus	directed parties to focus	to lead to admissible evidence	Lancaster claims rights as	
		for Phase 2 trial; Court has	for Phase 2 trial; Court has	for Phase 2 trial; Court has	for Phase 2 trial; Court has	dicovery requests upon Phase	dicovery requests upon Phase	for Phase 2 trial; Court has	an overlying user and claims	
	describe each WRITING which supports that contention.	directed parties to focus	directed parties to focus	directed parties to focus	directed parties to focus	2 matters; subject of testimony	2 matters; subject of testimony	directed parties to focus	a quantity reasonably necessary and avaialbel for	
27		dicovery requests upon Phase	dicovery requests upon Phase 2 matters.	dicovery requests upon Phase 2 matters.	dicovery requests upon Phase 2 matters.	, ,	which has not yet been fully	dicovery requests upon Phase	1	Objections: Not applies his
3/	(constructive notice)	2 matters.	z mauers.	z mauers.	z mauers.	developed.	developed.	2 matters.	municipal park purposes.	Objections; Not applicable.

Special Interrogatories	LAC Waterworks Dist 40 (Best, Best & Krieger)	Rosamond Comm Serv Dist (Best, Best & Krieger)	Littlerock Creek Irrig Dist (Lemieux & O'Neill)	Palm Ranch Irrig Dist (Lemieux & O'Neill)	Quartz Hill Water Dist (Lagerloff, Senecal)	Palmdale Water Dist (Lagerloff, Senecal)	•	City of Lancaster (Luce Forward)	City of Palmdale (Richards, Watson)
If YOU contend that all groundwater YOU have pumped from within the Basin has been put to a reasonable and beneficial use, please describe all uses of that groundwater. (rabu)	Does not seek info for Phase 2 trial; not relevant to Phase 2; testimony not yet fully developed; <i>District responds it has pumped groundwater for municipal and industrial purposes</i> ; compilation is necessary and none exists; expense of preparing compilation substantially same for interrogating party; response may be ascertained from Exhibit 1; the District's 2005 Urban Water Management Plan is available to the public on the Internet.	Does not seek info for Phase 2 trial; not relevant to Phase 2; District responds it has pumped groundwater for municipal and industrial purposes and maintains records of those quantities; compilation is necessary and none exists; expense of preparing compilation substantially same for interrogating party; response may be ascertained from Exhibit 1.	Does not seek info for Phase 2 trial; not relevant to Phase 2; testimony not yet fully developed; LCID maintains records showing quantity of groundwater pumped for municipal and industrial uses; compilation of LCID's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; a response may be ascertained from records in LCID's possession which will be produced for inspection and copying at a reasonable time and location; LCID pumps groundwater for customers muni and industrial uses.	Does not seek info for Phase 2 trial; not relevant to Phase 2; testimony not yet fully developed; PRID maintains records showing quantity of groundwater pumped for municipal and industrial uses; compilation of PRID's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; a response may be ascertained from records in PRID's possession which will be produced for inspection and copying at a reasonable time and location; PRID pumps groundwater for customers muni and industrial uses.	Does not seek info for Phase 2 trial; not relevant to Phase 2; testimony not yet fully developed; <i>District responds it has pumped groundwater for municipal and industrial purposes</i> ; compilation is necessary and none exists; expense of preparing compilation substantially same for interrogating party; <i>response may be ascertained from Exhibit 1.</i>	purposes and district maintains such records;	Company maintains records showing quantity of groundwater pumped; compilation of Company's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; not yet fully developed; company pumps for customer's muni and industrial uses; response may be ascertained from Exhibit 1	Burdensome and oppressive; outside scope; Per FAC Par. 3 Lancaster claims rights as an overlying user and claims a quantity reasonably necessary and avaialbel for municipal park purposes.	Objections, etc.; not applicable.
State each and every fact in support of your contention that YOU have pumped groundwater from Basin by "reasonable extraction" as alleged in paragraph 37 of your cross-complaint. (rabu)	none exists; expense of preparing compilation substantially same for interrogating party; <i>response</i>	Does not seek info for Phase 2 trial; not relevant to Phase 2; District responds it has pumped groundwater for municipal and industrial purposes and maintains records of those quantities; compilation is necessary and none exists; expense of preparing compilation substantially same for interrogating party; response may be ascertained from Exhibit 1.	Does not seek info for Phase 2 trial; not relevant to Phase 2; testimony not yet fully developed; LCID maintains records showing quantity of groundwater pumped for municipal and industrial uses; compilation of LCID's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; a response may be ascertained from records in LCID's possession which will be produced for inspection and copying at a reasonable time and location; LCID pumps groundwater for customers muni and industrial uses.	Does not seek info for Phase 2 trial; not relevant to Phase 2; testimony not yet fully developed; PRID maintains records showing quantity of groundwater pumped for municipal and industrial uses; compilation of PRID's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; a response may be ascertained from records in PRID's possession which will be produced for inspection and copying at a reasonable time and location; PRID pumps groundwater for customers muni and industrial uses.	Does not seek info for Phase 2 trial; not relevant to Phase 2; testimony not yet fully developed; District responds it has pumped groundwater for municipal and industrial purposes and maintains records of those quantities; compilation is necessary and none exists; expense of preparing compilation substantially same for interrogating party; response may be ascertained from Exhibit 1	Does not seek info for Phase 2 trial; not relevant to Phase 2; testimony not yet fully developed; District responds it has pumped groundwater for municipal and industrial purposes and maintains records of those quantities; compilation is necessary and none exists; expense of preparing compilation substantially same for interrogating party; response may be ascertained from Exhibit 1	1 -1 - 3 1	Burdensome and oppressive; outside scope; Per FAC Par. 3 Lancaster claims rights as an overlying user and claims a quantity reasonably necessary and avaialbel for municipal park purposes.	Objections, etc.; <i>not</i>

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		LAC Waterworks Dist 40 (Best, Best & Krieger)	Rosamond Comm Serv Dist (Best, Best & Krieger)	Littlerock Creek Irrig Dist (Lemieux & O'Neill)	Dist (Lemieux &	` •	Palmdale Water Dist (Lagerloff, Senecal)	•	City of Lancaster (Luce Forward)	City of Palmdale (Richards, Watson)
24	State each and every fact in support of your contention that you have used all groundwater that you have pumped from the Basin for reasonable and beneficial purposes as alleged in paragraph 37 of your crosscomplaint. (rabu)	compilation is necessary and none exists; expense of preparing compilation substantially same for interrogating party; <b>response</b>	Does not seek info for Phase 2 trial; not reasonably calculated to lead to admissible evidence for Phase 2 trial; District responds it has pumped groundwater for municipal and industrial purposes and maintains records of those quantities; compilation is necessary and none exists; expense of preparing compilation substantially same for interrogating party; response may be ascertained from Exhibit 1.	trial; not relevant to Phase 2; testimony not yet fully developed; LCID maintains records showing quantity of groundwater pumped for municipal and industrial uses; compilation of LCID's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; a response may be	Does not seek info for Phase 2 trial; not relevant to Phase 2; testimony not yet fully developed; PRID maintains records showing quantity of groundwater pumped for municipal and industrial uses; compilation of PRID seconds is necessary and none exists; expense of preparing compilation substantially same for interrogating party; a response may be ascertained from records in PRID's possession which will be produced for inspection and copying at a reasonable time and location; PRID pumps groundwater for customers muni and industrial uses.	developed; District responds it has pumped groundwater for municipal and industrial purposes and maintains records of those quantities; compilation is necessary and none exists; expense of preparing compilation substantially same for interrogating party; response may be ascertained from	Does not seek info for Phase 2 trial; not relevant to Phase 2; testimony not yet fully developed; District responds it has pumped groundwater for municipal and industrial purposes and maintains records of those quantities; compilation is necessary and	for interrogating party; response may be	Burdensome and oppressive; outside scope; Per FAC Par. 3 Lancaster claims rights as an overlying user and claims a quantity reasonably necessary and avaialbel for municipal park purposes.	Objections; Palmdale has never pumped from the Basin.
25	support of your contention that YOU have pumped or used groundwater from the Basin	preparing compilation substantially same for interrogating party; <i>response</i>	Does not seek info for Phase 2 trial; not reasonably calculated to lead to admissible evidence for Phase 2 trial; District responds it has pumped groundwater for municipal and industrial purposes and maintains records of those quantities; compilation is necessary and none exists; expense of preparing compilation substantially same for interrogating party; response may be ascertained from Exhibit 1.	Does not seek info for Phase 2 trial; not relevant to Phase 2; testimony not yet fully developed; LCID maintains records showing quantity of groundwater pumped for municipal and industrial uses; compilation of LCID's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; a response may be ascertained from records in LCID's possession which will be produced for inspection and copying at a reasonable time and location; LCID pumps groundwater for customers muni and industrial uses.	will be produced for inspection and copying at a reasonable time and location; PRID pumps	Does not seek info for Phase 2 trial; not reasonably calculated to lead to admissible evidence for Phase 2 trial; Court has directed parties to focus dicovery requests upon Phase 2 matters; subject of testimony which has not yet been fully developed.		Does not seek info for Phase 2 trial; not reasonably calculated to lead to admissible evidence for Phase 2 trial; Company responds it has pumped groundwater for municipal and industrial purposes and maintains records of those quantities; compilation is necessary and none exist; expense of preparing compilation substantially same for interrogating party; response may be ascertained from Exhibit 1; it pumps to supply water to its customers for muni and industrial uses.	Burdensome and oppressive; outside scope; Per FAC Par. 3 Lancaster claims rights as an overlying user and claims a quantity reasonably necessary and avaialbel for municipal park purposes.	

_	LAC Waterworks Dist 40 (Best, Best & Krieger)	Rosamond Comm Serv Dist (Best, Best & Krieger)	Littlerock Creek Irrig Dist (Lemieux & O'Neill)			Palmdale Water Dist (Lagerloff, Senecal)	Cal-Water (John Tootle)	City of Lancaster (Luce Forward)	City of Palmdale (Richards, Watson)
State each and every fact in support of your contention that YOU have pumped or used groundwater from the Basin in an "actual" manner as alleged in paragraph 37 of your cross-	Does not seek info for Phase 2 trial; not relevant to Phase 2; testimony not yet fully developed; District responds it has pumped groundwater for municipal and industrial purposes and maintains records of those quantities; compilation is necessary and none exists; expense of preparing compilation substantially same for interrogating party; response may be ascertained from Exhibit 1	Does not seek info for Phase 2 trial; not reasonably calculated to lead to admissible evidence for Phase 2 trial; District responds it has pumped groundwater for municipal and industrial purposes and maintains records of those quantities; compilation is necessary and none exists; expense of preparing compilation substantially same for interrogating party; response may be ascertained from Exhibit 1.	trial; not relevant to Phase 2; testimony not yet fully developed; LCID maintains records showing quantity of groundwater pumped for municipal and industrial uses; compilation of LCID's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; a response may be	-	Does not seek info for Phase 2 trial; not reasonably calculated to lead to admissible evidence for Phase 2 trial; Court has directed parties to focus dicovery requests upon Phase 2 matters; subject of testimony which has not yet been fully developed.		Does not seek info for Phase 2 trial; not reasonably calculated to lead to admissible evidence for Phase 2 trial; Company responds it has pumped groundwater for municipal and industrial purposes and maintains records of those quantities; compilation is necessary and none exists; expense of preparing compilation substantially same for interrogating party; response may be ascertained from Exhibit 1; it pumps to supply water to its customers for muni and industrial uses.	Burdensome and oppressive; outside scope; Per FAC Par. 3 Lancaster claims rights as an overlying user and claims a quantity reasonably necessary and avaialbel for municipal park purposes.	Objections; <i>Palmdale has</i> never pumped from the <i>Basin</i> .
Identify each and every use of water by any landowner in the Basin that YOU contend has made an unreasonable use of	Does not seek info for Phase 2 trial; not reasonably calculated to lead to admissible evidence for Phase 2 trial; Court has directed parties to focus dicovery requests upon Phase 2 matters; will further supplement its response at a reasonable time after the Phase 2 trial.	Does not seek info for Phase 2 trial; not reasonably calculated to lead to admissible evidence for Phase 2 trial; Court has directed parties to focus dicovery requests upon Phase 2 matters; will further supplement its response at a reasonable time after the Phase 2 trial.	trial; not reasonably calculated	trial; not reasonably calculated to lead to admissible evidence for Phase 2 trial; Court has directed parties to focus	Does not seek info for Phase 2 trial; not reasonably calculated to lead to admissible evidence for Phase 2 trial; Court has directed parties to focus dicovery requests upon Phase 2 matters; not yet fully developed; will further supplement its response at a reasonable time after the Phase 2 trial.	Does not seek info for Phase 2 trial; not reasonably calculated to lead to admissible evidence for Phase 2 trial; Court has directed parties to focus dicovery requests upon Phase 2 matters; will further supplement its response at a reasonable time after the Phase 2 trial.	Does not seek info for Phase 2 trial; not reasonably calculated to lead to admissible evidence for Phase 2 trial; will further supplement its response at a reasonable time after the Phase 2 trial.	Burdensome and oppressive; outside scope; Per FAC Par. 3 Lancaster claims rights as an overlying user and claims a oventy reasonably necessary and avaialbel for municipal park purposes.	Objections; <i>Discovery has</i> not been conducted on each party's method of use and use of water within the Basin.
Please state the identity of each landowner in the Basin that YOU contend has made an unreasonable use of water	Does not seek info for Phase 2 trial; not reasonably calculated to lead to admissible evidence for Phase 2 trial; Court has directed parties to focus dicovery requests upon Phase 2 matters; will agree to supplement at a reasonable time agreed on by parties.	Does not seek info for Phase 2 trial; not reasonably calculated to lead to admissible evidence for Phase 2 trial; Court has directed parties to focus dicovery requests upon Phase 2 matters; will agree to supplement at a reasonable time agreed on by parties.	trial; not reasonably calculated	Does not seek info for Phase 2 trial; not reasonably calculated to lead to admissible evidence for Phase 2 trial; Court has directed parties to focus dicovery requests upon Phase 2 matters; will agree to supplement at a reasonable time agreed on by parties.	trial; not reasonably calculated to lead to admissible evidence	Does not seek info for Phase 2 trial; not reasonably calculated to lead to admissible evidence for Phase 2 trial; Court has directed parties to focus dicovery requests upon Phase 2 matters; not yet fully developed; will further supplement its response at a reasonable time after the Phase 2 trial.	Does not seek info for Phase 2 trial; not reasonably calculated to lead to admissible evidence for Phase 2 trial; will agree to supplement at a reasonable time agreed on by parties.	Lancaster claims rights as	Objections; Discovery has not been conducted on each party's method of use and use of water within the Basin.

-	LAC Waterworks Dist 40 (Best, Best & Krieger)	• •	•	Dist (Lemieux &		Palmdale Water Dist (Lagerloff, Senecal)	•	City of Lancaster (Luce Forward)	City of Palmdale (Richards, Watson…)
Please state the period of time that YOU contend each such landowner has made an unreasonable use of water.	trial; not reasonably calculated to lead to admissible evidence for Phase 2 trial; answer is	to lead to admissible evidence for Phase 2 trial; answer is subject of testimony which has not been fully developed; will agree to supplement at a reasonable time agreed on	trial; not reasonably calculated to lead to admissible evidence for Phase 2 trial; answer is subject of testimony which has not been fully developed; will agree to supplement at a reasonable time agreed on	Does not seek info for Phase 2 trial; not reasonably calculated to lead to admissible evidence for Phase 2 trial; answer is	for Phase 2 trial; Court has directed parties to focus dicovery requests upon Phase 2 matters; not yet fully	dicovery requests upon Phase 2 matters; has not been fully	Does not seek info for Phase 2 trial; not reasonably calculated to lead to admissible evidence for Phase 2 trial; will agree to supplement at a reasonable time agreed on by parties.	Burdensome and oppressive; outside scope; Per FAC Par. 3 Lancaster claims rights as an overlying user and claims a quantity reasonably necessary and avaialbel for municipal park purposes.	Objections; Discovery has
					Does not seek info for Phase 2 trial; not reasonably calculated	Does not seek info for Phase 2			
landowner in the Basin has made an unreasonable use of	to lead to admissible evidence for Phase 2 trial; will agree to supplement at a reasonable	2 matters; will agree to		trial; not reasonably calculated to lead to admissible evidence for Phase 2 trial; will agree to supplement at a reasonable	directed parties to focus dicovery requests upon Phase	dicovery requests upon Phase 2 matters; has not been fully developed; will agree to	Does not seek info for Phase 2 trial; not reasonably calculated to lead to admissible evidence	Lancaster claims rights as an overlying user and claims a quantity reasonably	Objections; Discovery has

	Special	Dist 40 (Best, Best &			Dist (Lemieux &		Palmdale Water Dist (Lagerloff, Senecal)		City of Lancaster (Luce Forward)	City of Palmdale (Richards, Watson)
n	dentify by name and title each on-expert witness you intend									
	call at the next phase of the rial. (expert)		Attorney Work Product	Attorney Work Product	None at this time.	Attorney Work Product; Expert witness.				