

EXHIBIT 1

MUNICIPAL WATER PURVEYORS' RESPONSES TO WILLIS' SPECIAL INTERROGATORIES - SET 1

Requests Served: May 29, 2008

Responses Served: July 14, 2008

	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)	Cal-Water (John Tootle)	City of Lancaster (Luce Forward)	City of Palmdale (Richards, Watson...)
1	State the date when YOU first started pumping water from the Basin. (pumping)	1921	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.
2	State by month and year, the quantity of groundwater YOU have pumped from from each well that YOU have operated in the Basin during the RELEVANT PERIOD. (pumping)	response may be ascertained from Exhibit 1: Waterworks District Meter Readings For 1990	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	LCID maintains records showing quantity of groundwater pumped by LCID; 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.	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	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	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.
3	State by month and year the amount of State Project water, i.e. imported water, YOU have purchased from the Antelope Valley-East Kern Water Agency, over the Relevant Period. (pumping)	may be ascertained from Exhibit 2:	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.	PRID maintains records showing quantity 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 records in PRID's possession which will be produced for inspection and copying at a reasonable time.	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 purchases from LAC Water No. 40 which is believed to be a mix of groundwater and AVEK water.	Not applicable.	Vague; Answer is "None"

MUNICIPAL WATER PURVEYORS' RESPONSES TO WILLIS' SPECIAL INTERROGATORIES - SET 1

Requests Served: May 29, 2008

Responses Served: July 14, 2008

	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)	Cal-Water (John Tootle)	City of Lancaster (Luce Forward)	City of Palmdale (Richards, Watson...)
4	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. (pumping)	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.	"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; response may be ascertained from Exhibit 3 (NO EXHIBIT 3?)	"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 may be ascertained from Exhibit 3 (NO EXHIBIT 3?)	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 purchahses 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.
5	State the total quantity, by month and year, of non-municipal/non-industrial pumping of groundwater from the Basin for the years 1990 to date. (pumping)	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 "non-municipal/non-industrial pumping of groundwater"; 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";	Work product; AC Privilege; Expert witness; Does not pump groundwater for non-municipal/non-industrial use.	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.

MUNICIPAL WATER PURVEYORS' RESPONSES TO WILLIS' SPECIAL INTERROGATORIES - SET 1

Requests Served: May 29, 2008

Responses Served: July 14, 2008

	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)	Cal-Water (John Tootle)	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 cross-complaint. (safe yield)	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; 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; 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 "natural sources," "amount or quantity," and "recharge."; Expert witness; Work product; may 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; 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 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; 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," "recharge" and agricultural uses."; Expert witness; Work product; may supplement when expert study is completed.

MUNICIPAL WATER PURVEYORS' RESPONSES TO WILLIS' SPECIAL INTERROGATORIES - SET 1

Requests Served: May 29, 2008

Responses Served: July 14, 2008

	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)	Cal-Water (John Tootle)	City of Lancaster (Luce Forward)	City of Palmdale (Richards, Watson...)
10	For the years 1990 to the present, please state each year that you contend there was an overdraft of the Basin. (overdraft)	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; 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 privilege; AC Privilege; Work product; Expert witness; may 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; 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 privilege; 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; 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; may 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 groundwater from the Basin in excess of the safe yield of the Basin. (overdraft)	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; burdensome and oppressive.	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" (DWR?, PRID?) has restricted access to records or confidentiality requirements regarding use; burdensome and oppressive.	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 records; persons already identified as parties; burdensome and oppressive.	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.	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	Burdensome; legal conclusion; Vague; Joint defense privilege; AC Privilege; Work product; Expert witness; may supplement when expert study is completed.

MUNICIPAL WATER PURVEYORS' RESPONSES TO WILLIS' SPECIAL INTERROGATORIES - SET 1

Requests Served: May 29, 2008

Responses Served: July 14, 2008

	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)	Cal-Water (John Tootle)	City of Lancaster (Luce Forward)	City of Palmdale (Richards, Watson...)
14	If YOU contend that YOU have any correlative rights to the use of groundwater in the Basin, state each and every fact in support of your contention. (rights/priorities)	<i>The District does not contend it has such rights except for County landscaping, park and other recreational uses.</i>	<i>Assuming request concerns overlying rights, District does not have rights except for landscaping, park and other recreational uses.</i>	<i>LCID as irrigation district has the same rights to water as the State of CA and its customers.</i>	<i>PRID as irrigation district has the same rights to water as the State of CA and its customers.</i>	<i>Assuming request concerns overlying rights, District does not have rights except for landscaping of District property.</i>	<i>Assuming request concerns overlying rights, District does not have rights except for landscaping of District property.</i>	<i>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.</i>	Burdensome and oppressive; outside scope; <i>Per FAC Par. 3 Lancaster claims rights as an overlying user and claims a quantity reasonably necessary and avaialbel for municipal park purposes.</i>	Vague as to "use of groundwater"; <i>Palmdale owns substantial acreage of real property from which it could produce or use groundwater in the Basin, and accordingly Palmdale may have dormant correlative rights</i>
15	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; <i>the District uses a nominal amount of water.</i>	Attorney Work-Product; assuming overlying rights, <i>the District uses a nominal amount of water.</i>	Attorney Work-Product/Privilege; Expert Witness; <i>has not been fully developed and may be answered when studies are complete; LCID as irrigation district has the same rights to water as the State of CA and its customers.</i>	Attorney Work-Product/Privilege; Expert Witness; <i>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.</i>	Attorney Work-Product; Expert witness; <i>the District uses a nominal amount of water.</i>	Attorney Work-Product; Expert witness; <i>the District uses a nominal amount of water.</i>	Attorney Work-Product; Expert witness; <i>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.</i>	Burdensome and oppressive; outside scope; <i>Per FAC Par. 3 Lancaster claims rights as an overlying user and claims a quantity reasonably necessary and avaialbel for municipal park purposes.</i>	Vague as to "quantity"; <i>The quantity of Plamdales' rights in Basin is not presently ascertainable because they are dormant.</i>

MUNICIPAL WATER PURVEYORS' RESPONSES TO WILLIS' SPECIAL INTERROGATORIES - SET 1

Requests Served: May 29, 2008

Responses Served: July 14, 2008

	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)	Cal-Water (John Tootle)	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 fact in support of your contention. (rights/priorities)	<i>District maintains records showing quantity of groundwater pumped;</i> Compilation is necessary; no such compilation exists; burden would be substantially the same for interrogating party; <i>District has pumped since 1921; Response may be ascertained from Exhibit 1</i>	<i>District maintains records showing quantity of groundwater pumped;</i> Compilation is necessary; no such compilation exists; burden would be substantially the same for interrogating party; <i>District has pumped since 1966; Response may be ascertained from Exhibit 1</i>	<i>LCID maintains records showing quantity of groundwater pumped for muni and industrial uses;</i> compilation necessary and none exists; expense substantially same for interrogating party; <i>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.</i>	<i>PRID maintains records showing quantity of groundwater pumped for muni and industrial uses;</i> compilation necessary and none exists; expense substantially same for interrogating party; <i>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.</i>	<i>District maintains records showing quantity of groundwater pumped;</i> Compilation is necessary; no such compilation exists; burden would be substantially the same for interrogating party; <i>District has pumped since 1954; Response may be ascertained from Exhibit 1</i>	<i>Appropriative rights from District pumping since 1918; District maintains records showing quantity of groundwater pumped;</i> Compilation is necessary; no such compilation exists; burden would be substantially the same for interrogating party; <i>Response may be ascertained from Exhibit 1</i>	<i>Company maintains records showing quantity of groundwater pumped;</i> compilation of Company's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; <i>company has pumped since prior to 1965; response may be ascertained from Exhibit 1</i>	Burdensome and oppressive; outside scope; <i>Per FAC Par. 3 Lancaster claims rights as an overlying user and claims a quantity reasonably necessary and avaialbel for municipal park purposes.</i>	Vague as to "use of groundwater"; <i>Palmdale has not yet, but is in a position to exercise appropriatiev rights to produce and distribute groundwater at any time there is surplus in basin.</i>
17	If YOU contend that YOU have any appropriative rights to the use of groundwater in the Basin, state the quantity of such rights. (rights/priorities)	<i>District maintains records showing quantity of groundwater pumped;</i> Compilation is necessary; no such compilation exists; burden would be substantially the same for interrogating party; <i>District has pumped since 1921; Response may be ascertained from Exhibit 1</i>	<i>District maintains records showing quantity of groundwater pumped;</i> Compilation is necessary; no such compilation exists; burden would be substantially the same for interrogating party; <i>District has pumped since 1966; Response may be ascertained from Exhibit 1</i>	<i>LCID maintains records showing quantity of groundwater pumped for muni and industrial uses;</i> compilation necessary and none exists; expense substantially same for interrogating party; <i>a response may be ascertained from records in LCID's possession which will be produced for inspection and copying at a reasonable time.</i>	<i>PRID maintains records showing quantity of groundwater pumped for muni and industrial uses;</i> compilation necessary and none exists; expense substantially same for interrogating party; <i>a response may be ascertained from records in PRID's possession which will be produced for inspection and copying at a reasonable time.</i>	<i>District maintains records showing quantity of groundwater pumped;</i> Compilation is necessary; no such compilation exists; burden would be substantially the same for interrogating party; <i>District has pumped since 1954; Response may be ascertained from Exhibit 1</i>	<i>District maintains records showing quantity of groundwater pumped;</i> Compilation is necessary; no such compilation exists; burden would be substantially the same for interrogating party; <i>District has pumped since 1918; Response may be ascertained from Exhibit 1</i>	<i>Company maintains records showing quantity of groundwater pumped;</i> compilation of Company's records is necessary and none exists; expense of preparing compilation substantially same for interrogating party; not yet fully developed <i>company has pumped since prior to 1965; response may be ascertained from Exhibit 1</i>	Burdensome and oppressive; outside scope; <i>Per FAC Par. 3 Lancaster claims rights as an overlying user and claims a quantity reasonably necessary and avaialbel for municipal park purposes.</i>	Vague as to "quantity"; <i>The quantity of Plamdales' rights in Basin is not presently ascertainable because tPalmdale has not exercised.</i>

MUNICIPAL WATER PURVEYORS' RESPONSES TO WILLIS' SPECIAL INTERROGATORIES - SET 1

Requests Served: May 29, 2008

Responses Served: July 14, 2008

	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)	Cal-Water (John Tootle)	City of Lancaster (Luce Forward)	City of Palmdale (Richards, Watson...)
18	If YOU contend that YOU have acquired prescriptive rights to use groundwater within the Basin as against the Willis Class, please state each and every fact in support of your contention. (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; 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 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; 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.	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; 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.	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.	Premature; burdensome; No class rep has been approved; Palmdale does not contend it has acquired prescriptive rights within the Basin.
19	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.	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; compilation is necessary but does not exist; burden of expense substantially the 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 reasonbale time; 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; compilation is necessary but does not exist; burden of expense substantially the 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 reasonbale time; 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; 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.	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.	Vague as to "quantity"; No class rep has been approved; Palmdale does not contend it has acquired prescriptive rights within the Basin.

MUNICIPAL WATER PURVEYORS' RESPONSES TO WILLIS' SPECIAL INTERROGATORIES - SET 1

Requests Served: May 29, 2008

Responses Served: July 14, 2008

	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)	Cal-Water (John Tootle)	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 Basin, when was that prescriptive right acquired? (prescription)	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 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 prescriptive right five years after pumping groundwater from the basin in its overdraft condition the right has continued and continues to present time.</i>	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 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 prescriptive right five years after pumping groundwater from the basin in its overdraft condition, the right has continued and continues to present time.</i>	Does not seek info for Phase 2 trial; not relevant to Phase 2; testimony not yet fully developed; <i>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.</i>	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. 1959 and has been in overdraft since at least 1946; will further supplement its response at a reasonable time after the Phase 2 trial; PRID first acquired prescriptive right 5 years after pumping groundwater from Basin in overdraft , the right has continued and does continue to present.</i>	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 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; District first acquired prescriptive 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.</i>	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 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 prescriptive right five years after pumping groundwater from the basin in its overdraft condition, the right has continued and continues to present time.</i>	Does not seek info for Phase 2 trial; not relevant to Phase 2; testimony not yet fully developed; <i>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.</i>	Burdensome and oppressive; outside scope; <i>Per FAC Par. 3 Lancaster claims rights as an overlying user and claims a quantity reasonably necessary and avaiabel for municipal park purposes.</i>	<i>Palmdale does not contend it has acquired prescriptive rights within the Basin.</i>
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 commenced. (prescription)	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 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 prescriptive 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.</i>	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 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 prescriptive right five years after pumping groundwater from the basin in its overdraft condition, the right has continued and continues to present time.</i>	Does not seek info for Phase 2 trial; not relevant to Phase 2; testimony not yet fully developed; <i>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.</i>	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. 1959 and has been in overdraft since at least 1946; will further supplement its response at a reasonable time after the Phase 2 trial; PRID first acquired prescriptive right 5 years after pumping groundwater from Basin in overdraft, the right has continued and does continue to present.</i>	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 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; District first acquired prescriptive right five years after pumping groundwater from the basin in its overdraft condition which is no later than 1959, the right has continued and continues to present time.</i>	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 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 prescriptive 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.</i>	Does not seek info for Phase 2 trial; not relevant to Phase 2; testimony not yet fully developed; <i>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.</i>	Burdensome and oppressive; outside scope; <i>Per FAC Par. 3 Lancaster claims rights as an overlying user and claims a quantity reasonably necessary and avaiabel for municipal park purposes.</i>	<i>Palmdale does not contend it has acquired prescriptive rights within the Basin.</i>

MUNICIPAL WATER PURVEYORS' RESPONSES TO WILLIS' SPECIAL INTERROGATORIES - SET 1

Requests Served: May 29, 2008

Responses Served: July 14, 2008

	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)	Cal-Water (John Tootle)	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 paragraph 37 of your cross-complaint. (prescription)	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; 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 discovery 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 discovery 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; Palmdale has 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. (prescription)	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 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.	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 discovery 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 discovery 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; Palmdale has never pumped from the Basin.

MUNICIPAL WATER PURVEYORS' RESPONSES TO WILLIS' SPECIAL INTERROGATORIES - SET 1

Requests Served: May 29, 2008

Responses Served: July 14, 2008

	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)	Cal-Water (John Tootle)	City of Lancaster (Luce Forward)	City of Palmdale (Richards, Watson...)
29	State each and every fact in support of your contention that YOU have pumped or used water from the Basin in an "exclusive" manner as alleged in paragraph 37 of your cross-complaint. (prescription)	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 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.	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 discovery 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 discovery 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; Palmdale has never pumped from the Basin.
30	State each and every fact in support of your contention that YOU have pumped or used water from the Basin in a "continuous" manner as alleged in paragraph 37 of your cross-complaint. (prescription)	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 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.	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 discovery 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 discovery 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; Palmdale has never pumped from the Basin.

MUNICIPAL WATER PURVEYORS' RESPONSES TO WILLIS' SPECIAL INTERROGATORIES - SET 1

Requests Served: May 29, 2008

Responses Served: July 14, 2008

	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)	Cal-Water (John Tootle)	City of Lancaster (Luce Forward)	City of Palmdale (Richards, Watson...)
31	State each and every fact in support of your contention that YOU have pumped or used water from the Basin in an "uninterrupted" manner as alleged in paragraph 37 of your cross-complaint. (prescription)	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 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.	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 dicoverly 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 dicoverly 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; Palmdale has never pumped from the Basin.

MUNICIPAL WATER PURVEYORS' RESPONSES TO WILLIS' SPECIAL INTERROGATORIES - SET 1

Requests Served: May 29, 2008

Responses Served: July 14, 2008

	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)	Cal-Water (John Tootle)	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 the Basin, please identify and describe each WRITING that supports that contention. (Notice of extraction)	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.	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 LCID'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 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 response to doc production.	Notice of Extraction filed by District; will produce as response to doc production.	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 extracted more than 25 acre-feet of groundwater from the Basin, please state each and every fact in support of your contention. (Notice of extraction)	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.	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 LCID'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 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 response to doc production.	Notice of Extraction filed by District; will produce as response to doc production.	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;

MUNICIPAL WATER PURVEYORS' RESPONSES TO WILLIS' SPECIAL INTERROGATORIES - SET 1

Requests Served: May 29, 2008

Responses Served: July 14, 2008

	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)	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 dicoverly requests upon Phase 2 matters.	Does not seek info for Phase 2 trial; not relevant to Phase 2; Court has directed parties to focus dicoverly requests upon Phase 2 matters.	Does not seek info for Phase 2 trial; not relevant to Phase 2; Court has directed parties to focus dicoverly requests upon Phase 2 matters.	Does not seek info for Phase 2 trial; not relevant to Phase 2; Court has directed parties to focus dicoverly requests upon Phase 2 matters.	Does not seek info for Phase 2 trial; not relevant to Phase 2; Court has directed parties to focus dicoverly 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 dicoverly 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 dicoverly 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 avaiabel for municipal park purposes.	Objections; Not applicable.
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 each and every fact in support of your contention. (actual notice)	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 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	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 dicoverly 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 avaiabel for municipal park purposes.	Objections; Not applicable.
34	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 notice)	Does not seek info for Phase 2 trial; not reasonably calculated to lead to admissible evidence for Phase 2 trial; District responds it maintains records of groundwater quantities pumped for municipal and industial purposes; 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.	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;	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 reasonably calculated to lead to admissible evidence for Phase 2 trial; Court has directed parties to focus dicoverly 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 dicoverly 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 avaiabel for municipal park purposes.	Objections; Not applicable.

MUNICIPAL WATER PURVEYORS' RESPONSES TO WILLIS' SPECIAL INTERROGATORIES - SET 1

Requests Served: May 29, 2008

Responses Served: July 14, 2008

	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)	Cal-Water (John Tootle)	City of Lancaster (Luce Forward)	City of Palmdale (Richards, Watson...)
35	If YOU contend that any property owner in the Willis Class had constructive 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. (constructive notice)	Does not seek info for Phase 2 trial; not reasonably calculated to lead to admissible evidence for Phase 2 trial; District responds it maintains records of groundwater quantities pumped for municipal and industrial purposes ; 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.	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 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.	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 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 reasonably calculated to lead to admissible evidence for Phase 2 trial; Court has directed parties to focus discovery 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 discovery 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; Not applicable.
36	If YOU contend that any property owner in the Willis Class had constructive notice that your use of the groundwater was adverse to their right to use the groundwater underlying their property, please state each and every fact in support of your contention. (constructive notice)	Does not seek info for Phase 2 trial; not reasonably calculated to lead to admissible evidence for Phase 2 trial; District responds it maintains records of groundwater quantities pumped for municipal and industrial purposes ; 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.	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 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;	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 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 reasonably calculated to lead to admissible evidence for Phase 2 trial; Court has directed parties to focus discovery 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 discovery 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 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; Not applicable.
37	If YOU contend that any property owner in the Willis Class had constructive notice that your use of the groundwater was adverse to their right to use the groundwater underlying their property, please identify and describe each WRITING which supports that contention. (constructive notice)	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 discovery requests upon Phase 2 matters.	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 discovery requests upon Phase 2 matters.	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 discovery requests upon Phase 2 matters.	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 discovery requests upon Phase 2 matters.	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 discovery 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 discovery 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 discovery requests upon Phase 2 matters.	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; Not applicable.

MUNICIPAL WATER PURVEYORS' RESPONSES TO WILLIS' SPECIAL INTERROGATORIES - SET 1

Requests Served: May 29, 2008

Responses Served: July 14, 2008

	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)	Cal-Water (John Tootle)	City of Lancaster (Luce Forward)	City of Palmdale (Richards, Watson...)
22	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; District responds it has pumped groundwater for municipal and industrial purposes ; 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; District responds it has pumped groundwater for municipal and industrial purposes ; 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 district maintains such records ; 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.	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 avaiabel for municipal park purposes.	Objections, etc.; not applicable.
23	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)	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; 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 quntity 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	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 avaiabel for municipal park purposes.	Objections, etc.; not applicable.

MUNICIPAL WATER PURVEYORS' RESPONSES TO WILLIS' SPECIAL INTERROGATORIES - SET 1

Requests Served: May 29, 2008

Responses Served: July 14, 2008

	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)	Cal-Water (John Tootle)	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 cross-complaint. (rabu)	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.	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	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; Palmdale has never pumped from the Basin.
25	State each and every fact in support of your contention that YOU have pumped or used groundwater from the Basin under a "claim of right" as alleged in paragraph 37 of your cross-complaint. (rabu)	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.	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 dicoverly 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 dicoverly 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; Palmdale has never pumped from the Basin.

MUNICIPAL WATER PURVEYORS' RESPONSES TO WILLIS' SPECIAL INTERROGATORIES - SET 1

Requests Served: May 29, 2008

Responses Served: July 14, 2008

	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)	Cal-Water (John Tootle)	City of Lancaster (Luce Forward)	City of Palmdale (Richards, Watson...)
26	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-complaint. (rabu)	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.	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 discovery 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 discovery 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; Palmdale has never pumped from the Basin.
40	Identify each and every use of water by any landowner in the Basin that YOU contend has made an unreasonable use of water as you contend in paragraph 76 of your Cross-Complaint. (rabu)	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 discovery 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 discovery 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 discovery 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 discovery 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 discovery 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 discovery 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 quantity reasonably necessary and avaialbel for municipal park purposes.	Objections; Discovery has not been conducted on each party's method of use and use of water within the Basin.
41	Please state the identity of each landowner in the Basin that YOU contend has made an unreasonable use of water from 1990 to present. (rabu)	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 discovery 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 discovery 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 discovery 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 discovery 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 discovery 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 discovery 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.	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 not been conducted on each party's method of use and use of water within the Basin.

MUNICIPAL WATER PURVEYORS' RESPONSES TO WILLIS' SPECIAL INTERROGATORIES - SET 1

Requests Served: May 29, 2008

Responses Served: July 14, 2008

	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)	Cal-Water (John Tootle)	City of Lancaster (Luce Forward)	City of Palmdale (Richards, Watson...)
42	Please state the period of time that YOU contend each such landowner has made an unreasonable use of water. (rabu)	Does not seek info for Phase 2 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 by parties.	Does not seek info for Phase 2 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 by parties.	Does not seek info for Phase 2 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 by parties.	Does not seek info for Phase 2 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 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 discovery 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 discovery requests upon Phase 2 matters; has not been fully developed; 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; 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 avaiabel for municipal park purposes.	Objections; Discovery has not been conducted on each party's method of use and use of water within the Basin.
43	If YOU contend that any landowner in the Basin has made an unreasonable use of water, please state the annual quantity of such unreasonable use by each landowner. (rabu)	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.	Does not seek info for Phase 2 trial; Court has directed parties to focus discovery 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; 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; 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 discovery 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 discovery requests upon Phase 2 matters; has not been fully developed; 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; 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 avaiabel for municipal park purposes.	Objections; Discovery has not been conducted on each party's method of use and use of water within the Basin.

MUNICIPAL WATER PURVEYORS' RESPONSES TO WILLIS' SPECIAL INTERROGATORIES - SET 1

Requests Served: May 29, 2008

Responses Served: July 14, 2008

	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)	Cal-Water (John Tootle)	City of Lancaster (Luce Forward)	City of Palmdale (Richards, Watson...)
44	Identify by name and title each non-expert witness you intend to call at the next phase of the trial. (expert)	Attorney Work Product	Attorney Work Product	Attorney Work Product	Attorney Work Product	Attorney Work Product	Attorney Work Product	Attorney Work Product	None at this time.	Attorney Work Product; Expert witness.