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

**ANTELOPE VALLEY GROUNDWATER
CASES**

Included Actions:

Los Angeles County Waterworks District No. 40
v. Diamond Farming Co., Superior Court of
California, County of Los Angeles, Case No. BC
325201;

Los Angeles County Waterworks District No. 40
v. Diamond Farming Co., Superior Court of
California, County of Kern, Case No. S-1500-CV-
254-348;

Wm. Bolthouse Farms, Inc. v. City of Lancaster,
Diamond Farming Co. v. Lancaster, Diamond
Farming Co. v. Palmdale Water Dist., Superior
Court of California, County of Riverside, Case
No. RIC 353 840, RIC 344 436, RIC 344 668

Judicial Council Coordination No. 4408

Santa Clara Case No. 1-05-CV-049053
Assigned to Hon. Jack Komar

**NOTICE OF DEPOSITION OF
CHAD REED AND REQUEST FOR
PRODUCTION OF DOCUMENTS**

Date: March 18, 2013

Time: 9:30 a.m.

Place: Veritext

707 Wilshire Boulevard, Suite 3500
Los Angeles, CA 90017

Phase 4 Trial Date: May 28, 2013

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1 NOTICE IS HEREBY GIVEN as follows:

2 **I. NOTICE OF DEPOSITION**

3 TEJON RANCHCORP and GRANITE CONSTRUCTION COMPANY (the
4 "NOTICING PARTY") will take the deposition of CHAD REED (the "DEPONENT")
5 beginning at 9:30 on March 18, 2013 at VERITEXT, 707 WILSHIRE BOULEVARD, SUITE
6 3500 LOS ANGELES, CA 90017 and will continue from day-to-day thereafter until complete,
7 weekends and holidays excepted:

8 **II. REQUEST FOR PRODUCTION**

9 **A. DEFINITIONS**

10 The following words and phrases shall govern the construction of this document unless
11 the context otherwise requires:

12 1. "NOTICING PARTY" or "Tejon" means TEJON RANCHCORP and GRANITE
13 CONSTRUCTION COMPANY.

14 2. "DEPONENT" or "YOU" or "YOUR" means the deponent as set forth in the
15 notice.

16 3. "DOCUMENT" means "writing" as defined by Evidence Code section 250 and
17 includes drafts, originals and duplicates of written, graphic, computer or otherwise recorded
18 matters, whether stored in written, electronic, magnetic or photographic format or by any other
19 means.

20 **B. DOCUMENTS AND THINGS TO BE PRODUCED**

21 The DEPONENT is required to produce, at the date, time and location so noticed, all
22 DOCUMENTS described below. This demand relates not only to all DOCUMENTS under the
23 DEPONENT's possession, custody or control, but also those DOCUMENTS reasonably
24 available to the DEPONENT.
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1. All DOCUMENTS, including maps, plats and the like showing the location of the QUARTZ HILL WATER DISTRICT ("DISTRICT") wells.
2. All DOCUMENTS relating to the installation of each well installed by or on behalf of the DISTRICT since year 2000.
3. All DOCUMENTS evidencing the amount of groundwater pumped by the DISTRICT since year 2000.
4. All Notices of Groundwater Extraction and Diversion ("NOTICES") filed with the State Water Resources Control Board ("SWRCB") since 2000.
5. All correspondence with the SWRCB relating to groundwater extraction.
6. All check ledgers and cancelled checks evidencing payment of the filing fees associated with filing the NOTICES since 2000.
7. All DOCUMENTS that evidence the date the DISTRICT mailed or filed its NOTICES with the SWRCB.
8. All DISTRICT minutes that discuss, mention or refer to the payment of filing fees associated with filing the NOTICES since 2000.
9. The DISTRICT'S Accounts Payable ledgers for the period January 1, 2000 through December 31, 2012.
10. All DOCUMENTS evidencing the purchase of imported water by the DISTRICT at any time.
11. All DOCUMENTS evidencing the DISTRICT'S intent to capture return flows from imported water at any time.
12. All DOCUMENTS showing how the DISTRICT has accounted for return flows from imported water.
13. All DOCUMENTS, including memorandum, staff reports, resolutions of the

DISTRICT'S board, board meeting minutes and the like showing how the DISTRICT set water rates for years 1990 through current.

14. All DOCUMENTS evidencing any claimed overlying right of the DISTRICT to pump groundwater.

Dated: March 8, 2013

KUHS & PARKER

By 
Robert G. Kuhs, Attorney for
Tejon Ranchcorp and Granite Construction
Company

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