

1 Robert G. Kuhs, State Bar No. 160291  
2 Bernard C. Barmann, State Bar No. 149890  
3 Kuhs & Parker  
4 P. O. Box 2205  
5 1200 Truxtun Avenue, Suite 200  
6 Bakersfield, CA 93303  
7 Telephone: (661) 322-4004  
8 Facsimile: (661) 322-2906  
9 E-Mail: rgkuhs@kuhsparkerlaw.com  
10 bbarmann@kuhsparkerlaw.com

11 Attorneys for Tejon Ranchcorp, Tejon Ranch Company,  
12 and Granite Construction Company

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

14 **COUNTY OF LOS ANGELES - CENTRAL DISTRICT**

15 **ANTELOPE VALLEY GROUNDWATER**  
16 **CASES**

17 Included Actions:  
18 Los Angeles County Waterworks District No. 40  
19 v. Diamond Farming Co., Superior Court of  
20 California, County of Los Angeles, Case No. BC  
21 325201;

22 Los Angeles County Waterworks District No. 40  
23 v. Diamond Farming Co., Superior Court of  
24 California, County of Kern, Case No. S-1500-CV-  
25 254-348;

26 Wm. Bolthouse Farms, Inc. v. City of Lancaster,  
27 Diamond Farming Co. v. Lancaster, Diamond  
28 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 TO PALMDALE WATER  
DISTRICT TO APPEAR AND  
PRODUCE DOCUMENTS AT TRIAL**

[Code Civ. Proc., § 1987(b)-(c)]

Date: May 28, 2013  
Time: 9:00 a.m.  
Place: 111 N. Hill Str.  
Los Angeles, CA  
Dept.: TBD

To PALMDALE WATER DISTRICT ("District") and its attorney of record:


NOTICE IS HEREBY GIVEN that the District and Dennis Lamoreaux is hereby  
requested to attend the trial before the Superior Court of the County of Los Angeles in

1 Hill Street, Los Angeles, California or such other location pursuant to court order upon notice on  
2 May 28, 2013 at 9:00 a.m. to testify as a witness in this case.

3 The District has in its possession or under its control and is hereby requested to bring to  
4 the trial the documents described in the attached **Exhibit A**.

5 Dated: May 7, 2013

KUHS & PARKER

7  
8 By   
9 Robert G. Kuhs,  
10 Attorney for Tejon Ranchcorp, Tejon Ranch  
11 Company and Granite Construction Company

12  
13 f:\1291.01 - tejon ranch - antelope valley\notice to appear at trial palmdale wd phase iv.docx  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**EXHIBIT A**

**I. DEFINITIONS**

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

1. "DEMANDING PARTIES" means Tejon Ranchcorp and Granite Construction Co.
2. "DISTRICT" means Palmdale Water District.
3. "NOTICES" means Notices of Groundwater Extraction and Diversion filed with the SWRCB pursuant to Division 2, Part 5 of the Water Code, commencing with Section 4999, et seq.
4. "SWRCB" means the California State Water Resources Control Board.
5. "DOCUMENTS" means "writing" as defined by Evidence Code section 250 and includes drafts, originals and duplicates of written, graphic, computer or otherwise recorded matters, whether stored in written, electronic, magnetic or photographic format or by any other means.

**II. DOCUMENTS TO BE PRODUCED**

The DISTRICT is required to produce, at the date, time and location so noticed, the original of all DOCUMENTS described below.

1. All DOCUMENTS constituting the DISTRICT's records evidencing the amount of groundwater pumped by the DISTRICT since January 1, 2000.
2. All NOTICES filed with the SWRCB since January 1, 2000.
3. All DOCUMENTS evidencing the DISTRICT's correspondence with the SWRCB relating to groundwater extraction from January 1, 2000 to the present.

1           4.     All check ledgers and cancelled checks evidencing the payment of the filing fees  
2 associated with filing the NOTICES since January 1, 2000.

3           5.     The DISTRICT's accounts payable ledgers for the period January 1, 2000 through  
4 December 31, 2012.

5           6.     The DISTRICT's general ledgers for the period January 1, 2000 through  
6 December 31, 2012.

7           7.     Excel Spreadsheets showing the amount of groundwater pumped by the  
8 DISTRICT since 2006.

9           8.     Monthly well meter reading for DISTRICT wells from January 1, 2000 through  
10 December 31, 2012.

11           9.     Annual Southern California Edison pump efficiency test results for years 2,000  
12 through 2012.

13           10.    Excel Spreadsheets and monthly invoices showing the amount of imported water  
14 purchased by the District.

15           11.    All DOCUMENTS showing how the DISTRICT has accounted for return flows  
16 from imported water since 2000, including all budgets, audited financial statements, and audits  
17 of the DISTRICT for years 2000 through 2012.

18           12.    All DISTRICT water management plans since year 2000.

19           13.    All DOCUMENTS, including memorandum, staff reports, resolutions of the  
20 DISTRICT'S board, Board meeting minutes and the like showing how the DISTRICT set water  
21 rates for years 1990 through current.  
22  
23  
24  
25  
26  
27  
28