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Attorneys for Granite Construction Company

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

OBJECTIONS TO LITTLE ROCK SAND AND GRAVEL, INC., ET AL.'S NOTICE AND SUPPLEMENTAL NOTICE TO GRANITE CONSTRUCTION COMPANY TO APPEAR AND PRODUCE DOCUMENTS AT TRIAL

[Code Civ. Proc., § 2025.410.]

Phase 4 Trial Date: May 28, 2013

I. INTRODUCTION

GRANITE CONSTRUCTION COMPANY (the "objecting party") hereby objects to LITTLE ROCK SAND AND GRAVEL, INC., ET AL.'S (the "noticing party") Notice and Supplemental Notice to Granite Construction Company to Appear and Produce Documents at Trial (the "Notice") as follows:

II. DEFINITIONS

The following words and phrases, in addition to the words and phrases defined in Part I hereof, shall govern the construction of this document unless the context otherwise requires:

- 1. "Ground 1" means that the matter sought is neither admissible in evidence nor reasonably calculated to lead to the discovery of admissible evidence. (Code Civ. Proc., § 2017.010.)
 - 2. "Ground 2" means that the Notice is not timely.
 - 3. "Ground 3" means that the matter sought is equally available to the noticing party.
- 4. "Ground 4" means that the matter sought comes within the lawyer-client privilege. (Code Civ. Proc., § 2025.460.)
- "Ground 5" means that the matter sought is protected work-product under Code of Civil Procedure section 2018.030.
 - 6. "Ground 6" means that the matter sought is protected by the right of privacy.
 - 7. "Ground 7" means that the request is oppressive, harassing and burdensome.
 - 8. "Ground 8" means that the request is not full and complete in and of itself.
- 9. "Ground 9" means that the Notice contains subparts, or a compound, conjunctive or disjunctive request.
- 10. "Ground 10" means that the request is vague, ambiguous and unintelligible and fails to describe the exact documents requested in violation of Code of Civil Procedure section 1987(c).
 - 11. "Ground 11" means that the request is overbroad.
- 12. "Ground 12" means that the request seeks matter protected from premature disclosure by Article 2 (commencing with section 2034.210) of Chapter 18 of the Civil Discovery Act.

- 13. "Ground 13" means that the request fails to describe the matter sought with reasonable particularity and is unduly burdensome and oppressive given the voluminous and confusing instructions and definitions contained therein. (Calcor Space Facility v. Superior Court (1997) 53 Cal.App.4th 216, 222-223.)
- 14. "Ground 14" means the request seeks "trade secret" and/or confidential and proprietary matter.
- 15. "Ground 15" means that the request improperly seeks disclosure of the objecting party's contentions and/or asks the objecting party to designate evidence supporting the same.

 (Rifkind v. Superior Court (1994) 22 Cal.App.4th 1255.)

III. GENERAL OBJECTIONS

The objecting party interposes and incorporates by reference the following general objections to the Notice and to each and every request contained therein.

- 1. The objecting party objects to the Notice on Grounds 2, 4, 5, 6, 13 and 14.
- 2. The objecting party objects to the Notice on Ground 7 to the extent it seeks information already in the possession of the noticing party or available to the noticing party from other sources.
- 3. The objecting party objects to the Notice to the extent it seeks to impose obligation on the witness that exceeds the scope of permissible discovery under the Discovery Act.

IV. OBJECTIONS TO DOCUMENTS TO BE PRODUCED

Without waiving the general objections contained in Part III hereof or the specific objections contained in this part, the Responding Party responds as follows:

As to Supplemental Notice to Appear:

1. Objection on Grounds 1, 7, 8, 10 and 14.

1	2.	Objection on Grounds 1, 7, 8, 10 and 14.	
2	3.	Objection on Grounds 1, 7, 8, 10 and 14.	
3	4.	Objection on Grounds 1, 7, 8, 10 and 14.	
4	5.	Objection on Grounds 1, 7, 8, 10 and 14.	
5	6.	Objection on Grounds 1, 7, 8, 10 and 14.	
6 7	7.	Objection on Grounds 1, 7, 8, 10 and 14.	
8	8.	Objection on Grounds 1, 7, 8, 10 and 14.	
9	9.	Objection on Grounds 1, 7, 8, 10 and 14.	
10	10	. Objection on Grounds 1, 7, 8, 10 and 14.	
11	1 1	. Objection on Grounds 1, 7, 8, 10 and 14.	
12	12	. Objection on Grounds 1, 7, 8, 10 and 14.	
13	13	. Objection on Grounds 1, 3, 7, 8, 10 and 14.	
14 15	14	. Objection on Grounds 1, 7, 8, 10 and 14.	
16	15	. Objection on Grounds 1, 7, 8, 10 and 14.	
17	16	. Objection on Grounds 1, 3, 7, 8, 10 and 14.	
18	The objecting party additionally objects to the noticing party's Notice to Appear and		
19	Produce Documents at Trial as follows:		
20	1.	Objection on Grounds 1, 7, 8, 10 and 14.	
21	2.	Objection on Grounds 1, 7, 8, 10 and 14.	
22	3.	Objection on Grounds 1, 7, 8, 10 and 14.	
24	4.	Objection on Grounds 1, 7, 8, 10 and 14.	
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