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Attorney 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-254348;

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 353840,
RIC 344436, RIC 344668

Rebecca Lee Willis v. Los Angeles County
Waterworks District No. 40
Superior Court of California, County of Los
Angeles, Case No. BC 364553

Wood v. A.V. Materials, Inc., et al., Superior
Court of California, County of Los Angeles,
Case No. BC 509546

Little Rock Sand and Gravel, Inc. v. Granite
Construction Co., Superior Court of
California, County of Los Angeles, North
Judicial District, Case No. MC026932

Judicial Council Coordination No. 4408

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

**GRANITE CONSTRUCTION
COMPANY'S SUPPLEMENTAL
RESPONSES TO REQUEST FOR
PRODUCTION OF DOCUMENTS, SET
ONE**

RESPONDING PARTY: GRANITE CONSTRUCTION COMPANY
DEMANDING PARTY: LITTLE ROCK SAND AND GRAVEL, INC.
SET NUMBER: ONE

I. INTRODUCTION

LITTLE ROCK SAND AND GRAVEL, INC. (the "Demanding Party") served its Request for Production of Documents, Set One (the "Demand"), on GRANITE CONSTRUCTION COMPANY (the "Responding Party"). The Responding party objected to the Demanding Party's Demand on July 5, 2017. These are the Responding Party's supplemental responses to the Demand.

I. DEFINITIONS

The following words and phrases, in addition to the words and phrases defined in Part I hereof, shall govern the construction of these answers and objections 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 Demand is not timely under Code of Civil Procedure section 2024.020.

3. "Ground 3" means that the Demand contains a preface or instruction not approved under Chapter 17 of the Civil Discovery Act.

4. "Ground 4" means that the Demand is not full and complete in and of itself.

5. "Ground 5" means that the Demand contains subparts, or a compound, conjunctive or disjunctive request.

6. "Ground 6" means that the documents sought are equally available to the Demanding Party.

7. "Ground 7" means that the excessive use of definitions and instructions makes the Demand vague, ambiguous and unintelligible, overly burdensome and oppressive, and fail to

1 describe the requested documents with reasonable particularity. (*Calcor Space Facility v.*
2 *Superior Court* (1997) 53 Cal.App.4th 216.)

3 8. "Ground 8" means that the documents sought come within the lawyer-client
4 privilege. (Code Civ. Proc., § 2031.240(b).)

5 9. "Ground 9" means that the documents sought are protected work-product under
6 Code of Civil Procedure section 2018.030. (Code Civ. Proc., § 2031.240(b).)

7 10. "Ground 10" means that the Demand is vague, ambiguous and unintelligible and
8 fails to describe documents with reasonable particularity. (Code Civ. Proc., § 2031.030(c)(1);
9 *Calcor Space Facility v. Superior Court* (1997) 53 Cal.App.4th 216.)

10 11. "Ground 11" means that the Demand is oppressive, harassing and burdensome.

11 12. "Ground 12" means that the Demand is overbroad.

12 13. "Ground 13" means that the Demand seeks confidential and/or trade secret
13 information.

14 14. "Ground 14" means that the documents sought are protected by the right of
15 privacy.

16 15. "Ground 15" means that the Demand seeks matter protected from premature
17 disclosure by Code of Civil Procedure section 2034.210 et. seq.

18 16. "Ground 16" means that the Demand seeks to impose an obligation on the
19 Responding Party that exceeds the scope of permissible discovery under the Discovery Act.

20 17. "Ground 17" means that the Demand seeks discovery in a matter in which the
21 court lacks jurisdiction over the subject matter of the action and any discovery in the proceeding
22 at this stage is premature and improper.

23 II. GENERAL OBJECTIONS

24 The Responding Party objects to the Demand on the grounds that this action should have
25 been filed, if at all, as a post-judgment proceeding in the Antelope Valley Groundwater Cases
26 before Judge Komar, and not as a separate action and discovery in this action, if any, should be
27 conducted only to the extent authorized by Judge Komar. In other words, the improper filing of
28 this separate action should not operate to require the Responding Party to respond to discovery

1 pertaining to the subject matter of the Antelope Valley Groundwater Cases except as authorized
2 by Judge Komar.

3 The Responding Party objects to the Demand on Grounds 1, 3, 6, 7, 8, 9, 10, 11, 12, 16
4 and 17.

5 The Responding Party objects to the production of documents on the date specified, at the
6 location specified, and in the form specified in the Demand on the grounds that the Demand is
7 oppressive, harassing and burdensome, and that the Demand seeks to impose an obligation on the
8 Responding Party that exceeds the scope of permissible discovery under the Discovery Act. The
9 Responding Party will produce the documents noted in part III hereof at Kuhs & Parker, 1200
10 Truxtun Avenue, Suite 200, Bakersfield, California 93301, or at another location agreed to
11 between counsel, on a date agreed to between counsel, or by delivering copies to Demanding
12 Party's counsel.

13 III. RESPONSES

14 RESPONDING PARTY hereby answers DEMANDING PARTY's Request for
15 Production:

16 **RESPONSE TO REQUEST FOR PRODUCTION 1:**

17 In addition to and without waiving the General Objections stated in Part II above,
18 Responding Party objects to Request No. 1 on grounds 1, 3, 4, 6, 7, 8, 9, 10, 11, 12, 16 and 17.

19 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION 1:**

20 In addition to and without waiving the General Objections stated in Part II above,
21 Responding Party objects to Request No. 2 on grounds 6, 7, 8, 9, 10, 11, and 12. Subject to and
22 without waiving the foregoing objections, Responding Party responds as follows: the documents
23 that support Responding Party's denial of paragraph 6 of the Complaint include the documents
24 attached to and/or referenced in Responding Party's Answer, the documents introduced in
25 evidence by the Responding Party during the course of the Antelope Valley Groundwater Cases,
26 and the documents attached to the Declaration of Robert G. Kuhs in Opposition to Lane Family's
27 Motion for Post Judgment Supplemental Order Re Granite Construction Company, which
28 documents have already been provided to the Demanding Party.

1 **RESPONSE TO REQUEST FOR PRODUCTION 2:**

2 In addition to and without waiving the General Objections stated in Part II above,
3 Responding Party objects to Request No. 3 on grounds 1, 3, 4, 6, 7, 8, 9, 10, 11, 12, 16 and 17.

4 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION 2:**

5 In addition to and without waiving the General Objections stated in Part II above,
6 Responding Party objects to Request No. 2 on grounds 6, 7, 8, 9, 10, 11, and 12. Subject to and
7 without waiving the foregoing objections, Responding Party responds as follows: the documents
8 that support Responding Party's denial of paragraph 21 of the Complaint include the documents
9 attached to and/or referenced in Responding Party's Answer, the documents introduced in
10 evidence by the Responding Party during the course of the Antelope Valley Groundwater Cases,
11 and the documents attached to the Declaration of Robert G. Kuhs in Opposition to Lane Family's
12 Motion for Post Judgment Supplemental Order Re Granite Construction Company, which
13 documents have already been provided to the Demanding Party.

14 **RESPONSE TO REQUEST FOR PRODUCTION 3:**

15 In addition to and without waiving the General Objections stated in Part II above,
16 Responding Party objects to Request No. 4 on grounds 1, 3, 4, 6, 7, 8, 9, 10, 11, 12, 16 and 17.

17 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION 3:**

18 In addition to and without waiving the General Objections stated in Part II above,
19 Responding Party objects to Request No. 3 on grounds 6, 7, 8, 9, 10, 11, and 12. Subject to and
20 without waiving the foregoing objections, Responding Party responds as follows: the documents
21 that support Responding Party's denial of paragraph 23 of the Complaint include the documents
22 attached to and/or referenced in Responding Party's Answer, the documents introduced in
23 evidence by the Responding Party during the course of the Antelope Valley Groundwater Cases,
24 and the documents attached to the Declaration of Robert G. Kuhs in Opposition to Lane Family's
25 Motion for Post Judgment Supplemental Order Re Granite Construction Company, which
26 documents have already been provided to the Demanding Party.

1 **RESPONSE TO REQUEST FOR PRODUCTION 4:**

2 In addition to and without waiving the General Objections stated in Part II above,
3 Responding Party objects to Request No. 5 on grounds 1, 3, 4, 6, 7, 8, 9, 10, 11, 12, 16 and 17.

4 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION 4:**

5 In addition to and without waiving the General Objections stated in Part II above,
6 Responding Party objects to Request No. 4 on grounds 6, 7, 8, 9, 10, 11, and 12. Subject to and
7 without waiving the foregoing objections, Responding Party responds as follows: the documents
8 that "RELATE to the allegations stated in paragraph 6 of" Responding Party's Answer are all
9 documents served, filed or introduced into evidence and all correspondence exchanged among
10 the parties and their counsel during the course of the Antelope Valley Groundwater Cases. Such
11 documents include the documents attached to Responding Party's Answer and the documents
12 attached to the Declaration of Robert G. Kuhs in Opposition to Lane Family's Motion for Post
13 Judgment Supplemental Order Re Granite Construction Company.

14 **RESPONSE TO REQUEST FOR PRODUCTION 5:**

15 In addition to and without waiving the General Objections stated in Part II above,
16 Responding Party objects to Request No. 6 on grounds 1, 3, 4, 6, 7, 8, 9, 10, 11, 12, 16 and 17.

17 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION 5:**

18 In addition to and without waiving the General Objections stated in Part II above,
19 Responding Party objects to Request No. 5 on grounds 6, 7, 8, 9, 10, 11, and 12. Subject to and
20 without waiving the foregoing objections, Responding Party responds as follows: As phrased
21 Responding Party is uncertain what documents this demand requests. Responding Party admitted
22 the allegations contained in paragraph 14 of the Complaint to the extent alleged in paragraph 8 of
23 Responding Party's Answer and denied the allegations in paragraph 14 of the Complaint only to
24 the extent not admitted. Responding Party is willing to meet and confer with the Demanding
25 Party to discuss what documents, if any, Demanding Party seeks by this request.

26 **RESPONSE TO REQUEST FOR PRODUCTION 6:**

27 In addition to and without waiving the General Objections stated in Part II above,
28 Responding Party objects to Request No. 7 on grounds 1, 3, 4, 6, 7, 8, 9, 10, 11, 12, 16 and 17.

1 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION 6:**

2 In addition to and without waiving the General Objections stated in Part II above,
3 Responding Party objects to Request No. 6 on grounds 6, 7, 8, 9, 10, 11, and 12. Subject to and
4 without waiving the foregoing objections, Responding Party responds as follows: the documents
5 that support Responding Party's First Affirmative Defense (Jurisdiction) include the documents
6 attached to and/or referenced in Responding Party's Answer, which documents have already
7 been provided to the Demanding Party.

8 **RESPONSE TO REQUEST FOR PRODUCTION 7:**

9 In addition to and without waiving the General Objections stated in Part II above,
10 Responding Party objects to Request No. 8 on grounds 1, 3, 4, 6, 7, 8, 9, 10, 11, 12, 16 and 17.

11 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION 7:**

12 In addition to and without waiving the General Objections stated in Part II above,
13 Responding Party objects to Request No. 7 on grounds 6, 7, 8, 9, 10, 11, and 12. Subject to and
14 without waiving the foregoing objections, Responding Party responds as follows: the documents
15 that support Responding Party's Second Affirmative Defense (Another Action Pending) are all
16 documents served, filed or introduced into evidence and all correspondence exchanged among
17 the parties and their counsel during the course of the Antelope Valley Groundwater Cases. Such
18 documents include the documents attached to Responding Party's Answer, which documents
19 have already been provided to the Demanding Party.

20 **RESPONSE TO REQUEST FOR PRODUCTION 8:**

21 In addition to and without waiving the General Objections stated in Part II above,
22 Responding Party objects to Request No. 9 on grounds 1, 3, 4, 6, 7, 8, 9, 10, 11, 12, 16 and 17.

23 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION 8:**

24 In addition to and without waiving the General Objections stated in Part II above,
25 Responding Party objects to Request No. 8 on grounds 6, 7, 8, 9, 10, 11, and 12. Subject to and
26 without waiving the foregoing objections, Responding Party responds as follows: the documents
27 that support Responding Party's Third Affirmative Defense (California Constitution Article X,
28 Section 2) include the documents attached to and/or referenced in Responding Party's Answer

1 and the documents introduced in evidence by the Responding Party during the course of the
2 Antelope Valley Groundwater Cases, and the documents attached to the Declaration of Robert G.
3 Kuhs in Opposition to Lane Family's Motion for Post Judgment Supplemental Order Re Granite
4 Construction Company, which documents have already been provided to the Demanding Party

5 **RESPONSE TO REQUEST FOR PRODUCTION 9:**

6 In addition to and without waiving the General Objections stated in Part II above,
7 Responding Party objects to Request No. 10 on grounds 1, 3, 4, 6, 7, 8, 9, 10, 11, 12, 16 and 17.

8 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION 9:**

9 In addition to and without waiving the General Objections stated in Part II above,
10 Responding Party objects to Request No. 9 on grounds 6, 7, 8, 9, 10, 11, and 12. Subject to and
11 without waiving the foregoing objections, Responding Party responds as follows: the documents
12 that support Responding Party's Fourth Affirmative Defense (Effect of Stipulation for Entry of
13 Judgment and Physical Solution and Judgment) include the documents attached to and/or
14 referenced in Responding Party's Answer, which documents have already been provided to the
15 Demanding Party.

16 **RESPONSE TO REQUEST FOR PRODUCTION 10:**

17 In addition to and without waiving the General Objections stated in Part II above,
18 Responding Party objects to Request No. 11 on grounds 1, 3, 4, 6, 7, 8, 9, 10, 11, 12, 16 and 17.

19 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION 10:**

20 In addition to and without waiving the General Objections stated in Part II above,
21 Responding Party objects to Request No. 10 on grounds 6, 7, 8, 9, 10, 11, and 12. Subject to and
22 without waiving the foregoing objections, Responding Party responds as follows: the documents
23 that support Responding Party's Fifth Affirmative Defense (Estoppel) include the documents
24 attached to and/or referenced in Responding Party's Answer, all documents served, filed or
25 introduced in evidence by the Responding Party or the Demanding Party during the course of the
26 Antelope Valley Groundwater Cases, the documents attached to the Declaration of Robert G.
27 Kuhs in Opposition to Lane Family's Motion for Post Judgment Supplemental Order Re Granite
28 Construction Company, and all correspondence between Responding Party and Demanding Party

1 and their counsel during the pendency of the Antelope Valley Groundwater Cases, all of which
2 have already been provided to the Demanding Party.

3 **RESPONSE TO REQUEST FOR PRODUCTION 11:**

4 In addition to and without waiving the General Objections stated in Part II above,
5 Responding Party objects to Request No. 12 on grounds 1, 3, 4, 6, 7, 8, 9, 10, 11, 12, 16 and 17.

6 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION 11:**

7 In addition to and without waiving the General Objections stated in Part II above,
8 Responding Party objects to Request No. 11 on grounds 6, 7, 8, 9, 10, 11, and 12. Subject to and
9 without waiving the foregoing objections, Responding Party responds as follows: the documents
10 that support Responding Party's Sixth Affirmative Defense (Waiver) include the documents
11 attached to and/or referenced in Responding Party's Answer, all documents served, filed or
12 introduced in evidence by the Responding Party or the Demanding Party during the course of the
13 Antelope Valley Groundwater Cases, the documents attached to the Declaration of Robert G.
14 Kuhs in Opposition to Lane Family's Motion for Post Judgment Supplemental Order Re Granite
15 Construction Company, and all correspondence between Responding Party and Demanding Party
16 and their counsel during the pendency of the Antelope Valley Groundwater Cases, all of which
17 have already been provided to the Demanding Party.

18 **RESPONSE TO REQUEST FOR PRODUCTION 13:**

19 In addition to and without waiving the General Objections stated in Part II above,
20 Responding Party objects to Request No. 13 on grounds 1, 3, 4, 6, 7, 8, 9, 10, 11, 12, 16 and 17.

21 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION 13:**

22 In addition to and without waiving the General Objections stated in Part II above,
23 Responding Party objects to Request No. 13 on grounds 6, 7, 8, 9, 10, 11, and 12. Subject to and
24 without waiving the foregoing objections, Responding Party responds as follows: documents that
25 support Responding Party's Eighth Affirmative Defense (Unjust Enrichment) include the
26 documents attached to and/or referenced in Responding Party's Answer, all documents served,
27 filed or introduced in evidence by the Responding Party or the Demanding Party during the
28 course of the Antelope Valley Groundwater Cases, the documents attached to the Declaration of

Robert G. Kuhs in Opposition to Lane Family's Motion for Post Judgment Supplemental Order Re Granite Construction Company, and all correspondence between Responding Party and Demanding Party and their counsel during the pendency of the Antelope Valley Groundwater Cases, all of which have already been provided to the Demanding Party.

RESPONSE TO REQUEST FOR PRODUCTION 14:

In addition to and without waiving the General Objections stated in Part II above, Responding Party objects to Request No. 14 on grounds 1, 3, 4, 6, 7, 8, 9, 10, 11, 12, 16 and 17.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION 14:

In addition to and without waiving the General Objections stated in Part II above, Responding Party objects to Request No. 14 on grounds 6, 7, 8, 9, 10, 11, and 12. Subject to and without waiving the foregoing objections, Responding Party responds as follows: Responding Party asserted the Ninth Affirmative Defense (Statute of Limitations) out of an abundance of caution, and Responding Party is not presently aware of any documents supporting this defense.

RESPONSE TO REQUEST FOR PRODUCTION 15:

In addition to and without waiving the General Objections stated in Part II above, Responding Party objects to Request No. 15 on grounds 1, 3, 4, 6, 7, 8, 9, 10, 11, 12, 16 and 17.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION 15:

In addition to and without waiving the General Objections stated in Part II above, Responding Party objects to Request No. 15 on grounds 6, 7, 8, 9, 10, 11, and 12. Subject to and without waiving the foregoing objections, Responding Party responds as follows: Responding Party asserted the Tenth Affirmative Defense (Laches) out of an abundance of caution, and Responding Party is not presently aware of any documents supporting this defense.

RESPONSE TO REQUEST FOR PRODUCTION 16:

In addition to and without waiving the General Objections stated in Part II above, Responding Party objects to Request No. 16 on grounds 1, 3, 4, 6, 7, 8, 9, 10, 11, 12, 16 and 17.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION 16:

In addition to and without waiving the General Objections stated in Part II above, Responding Party objects to Request No. 16 on grounds 6, 7, 8, 9, 10, 11, and 12. Subject to and

1 without waiving the foregoing objections, Responding Party responds as follows: the documents
2 that support Responding Party's Eleventh Affirmative Defense (Unclean Hands) include the
3 documents attached to and/or referenced in Responding Party's Answer, all documents served,
4 filed or introduced in evidence by the Responding Party or the Demanding Party during the
5 course of the Antelope Valley Groundwater Cases, the documents attached to the Declaration of
6 Robert G. Kuhs in Opposition to Lane Family's Motion for Post Judgment Supplemental Order
7 Re Granite Construction Company, and all correspondence between Responding Party and
8 Demanding Party and their counsel during the pendency of the Antelope Valley Groundwater
9 Cases, all of which have already been provided to the Demanding Party.

10 **RESPONSE TO REQUEST FOR PRODUCTION 17:**

11 In addition to and without waiving the General Objections stated in Part II above,
12 Responding Party objects to Request No. 17 on grounds 1, 3, 4, 6, 7, 8, 9, 10, 11, 12, 16 and 17.

13 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION 17:**

14 In addition to and without waiving the General Objections stated in Part II above,
15 Responding Party objects to Request No. 17 on grounds 6, 7, 8, 9, 10, 11, and 12. Subject to and
16 without waiving the foregoing objections, Responding Party responds as follows: the documents
17 that support Responding Party's Twelfth Affirmative Defense (Unconscionability) include the
18 documents attached to and/or referenced in Responding Party's Answer, all documents served,
19 filed or introduced in evidence by the Responding Party or the Demanding Party during the
20 course of the Antelope Valley Groundwater Cases, the documents attached to the Declaration of
21 Robert G. Kuhs in Opposition to Lane Family's Motion for Post Judgment Supplemental Order
22 Re Granite Construction Company, and all correspondence between Responding Party and
23 Demanding Party and their counsel during the pendency of the Antelope Valley Groundwater
24 Cases, all of which have already been provided to the Demanding Party.

25 **RESPONSE TO REQUEST FOR PRODUCTION 18:**

26 In addition to and without waiving the General Objections stated in Part II above,
27 Responding Party objects to Request No. 18 on grounds 1, 3, 4, 6, 7, 8, 9, 10, 11, 12, 16 and 17.
28

1 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION 18:**

2 In addition to and without waiving the General Objections stated in Part II above,
3 Responding Party objects to Request No. 18 on grounds 6, 7, 8, 9, 10, 11, and 12. Subject to and
4 without waiving the foregoing objections, Responding Party responds as follows: the documents
5 that support Responding Party's Thirteenth Affirmative Defense (Res Judicata) include the
6 documents attached to and/or referenced in Responding Party's Answer, all documents served,
7 filed or introduced in evidence by the Responding Party or the Demanding Party during the
8 course of the Antelope Valley Groundwater Cases, and the documents attached to the
9 Declaration of Robert G. Kuhs in Opposition to Lane Family's Motion for Post Judgment
10 Supplemental Order Re Granite Construction Company.

11 **RESPONSE TO REQUEST FOR PRODUCTION 19:**

12 In addition to and without waiving the General Objections stated in Part II above,
13 Responding Party objects to Request No. 19 on grounds 1, 3, 4, 6, 7, 8, 9, 10, 11, 12, 16 and 17.

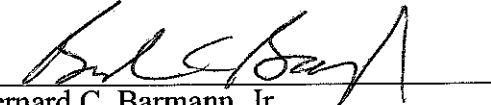
14 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION 19:**

15 In addition to and without waiving the General Objections stated in Part II above,
16 Responding Party objects to Request No. 19 on grounds 6, 7, 11, and 12. Subject to and without
17 waiving the foregoing objections, Responding Party responds as follows: the documents
18 identified in Responding Party's responses to Form Interrogatories, Set One have previously
19 been provided to the Demanding Party.

20 DATED: October 31, 2017

As to objections only,

21 KUHS & PARKER

22 By 
23 Bernard C. Barmann, Jr.
24 Attorneys for Granite Construction Company

(VERIFICATION — 446, 2015.5 C.C.P.)

STATE OF CALIFORNIA, COUNTY OF KERN

I am an employee of Granite Construction Company, a party in the above-entitled action, and am authorized to make this verification on its behalf; I have read the foregoing **GRANITE CONSTRUCTION COMPANY'S SUPPLEMENTAL RESPONSES TO REQUEST FOR PRODUCTION OF DOCUMENTS, SET ONE**, and know the contents thereof; and I certify that the same is true of my own knowledge, except as to those matters which are therein stated upon my information or belief, and as to those matters I believe it to be true.

I certify (or declare) under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on October 30, 2017, at Ventura, California.



William Taylor

**PROOF OF SERVICE
STATE OF CALIFORNIA, COUNTY OF KERN**

I, Valerie Hanners, declare:

I am employed in the County of Kern, State of California. I am over the age of 18 and am not a party to the within action; my business address is Kuhs & Parker, 1200 Truxtun Avenue, Suite 200, Bakersfield, California 93301.

On October 31, 2017, I caused the foregoing document(s) described as **GRANITE CONSTRUCTION COMPANY'S SUPPLEMENTAL RESPONSES TO REQUEST FOR PRODUCTION OF DOCUMENTS, SET ONE** to be served on the parties in this action, as follows:

Theodore A. Chester, Jr. (U.S. Mail)
Stephen R. Isbell
Musick, Peeler & Garrett, LLP
One Wilshire Boulevard, Suite 2000
Los Angeles, CA 90017-3383

All Parties in the Antelope Valley Groundwater Cases
(Electronic service via Glotrans)

X (BY ELECTRONIC SERVICE) by serving the document(s) listed above via Antelope Valley Watermaster Electronic Document Service – (www.avwatermaster.org) c/o Glotrans, to all parties appearing on the electronic service list for the Antelope Valley Groundwater case. Electronic service is complete at the time of transmission. My electronic notification email address is vhanners@kuhsparkerlaw.com

X (BY U.S. MAIL) on October 31, 2017, at Bakersfield, California, pursuant to C.C.P. section 1013(a), I:
___ deposited the sealed envelope with the United States Postal Service, with the postage fully prepaid.

X placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is place for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

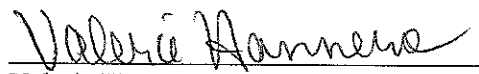
___ (BY EMAIL TRANSMISSION) on October 31, 2017, at approximately p.m. to:

___ (BY FACSIMILE TRANSMISSION) on October 31, 2017 at approximately ___ p.m., pursuant to Rule 2008 of the California Rules of Court. The telephone number of the sending facsimile machine was 661/322-2906. A transmission report (copy attached hereto) was properly issued by the sending facsimile machine, and the transmission was reported as completed and without error.

___ (BY PERSONAL SERVICE) on October 31, 2017 pursuant to C.C.P. section 1011, I caused such envelope to be delivered by hand personally to the addressee(s):

___ (BY OVERNIGHT COURIER) on October 31, 2017 pursuant to C.C.P. section 1013I(d), I caused such envelope with delivery fees fully prepared to be sent by Federal Express to **Theodore A. Chester, Jr. at Musick, Peeler & Garrett, LLP.**

___ (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct, and that the foregoing was executed on October 31, 2017, in Bakersfield, California.


Valerie Hanners