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10 Attorneys for Granite Construction Company

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

13 **ANTELOPE VALLEY GROUNDWATER**
14 **CASES**

15 **INCLUDED ACTIONS:**

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

20 Los Angeles County Waterworks District No. 40
21 v. Diamond Farming Co., Superior Court of
22 California, County of Kern, Case No. S-1500-CV-
23 254348;

24 Wm. Bolthouse Farms, Inc. v. City of Lancaster,
25 Diamond Farming Co. v. Lancaster, Diamond
26 Farming Co. v. Palmdale Water Dist., Superior
27 Court of California, County of Riverside, Case
28 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

RESPONSE TO LITTLE ROCK
SAND AND GRAVEL INC.'S FORM
INTERROGATORIES, SET TWO

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

I. INTRODUCTION

LITTLE ROCK SAND AND GRAVEL, INC. (the “Demanding Party” or “Little Rock”) served its Form Interrogatories, Set Two (the “Interrogatories”), on GRANITE CONSTRUCTION COMPANY (the “Responding Party” or “Granite”). This is the Responding Party's responses and objections to the Interrogatories.

II. 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 Interrogatory is not timely. (Code Civ. Proc., § 2024.020.)
3. “Ground 3” means that the Interrogatory contains a preface or instruction not approved under Chapter 17 of the Civil Discovery Act. (Code Civ. Proc., § 2030.060(d).)
4. “Ground 4” means that the Interrogatory is not full and complete in and of itself. (Code Civ. Proc., § 2030.060(d).)
5. “Ground 5” means that the Interrogatory contains subparts, or a compound, conjunctive, or disjunctive question. (Code Civ. Proc., § 2030.060(f).)
6. “Ground 6” means that the information sought is equally available to the Demanding Party. (Code Civ. Proc., § 2030.220(c).)
7. “Ground 7” means that the information sought would necessitate the preparation or the making of a compilation, abstract, audit, or summary of or from the documents of the Responding Party and the burden or expense of preparing or making it would be substantially the

1 same for the Propounding Party as for the Responding Party. (Code Civ. Proc., § 2030.230.)

2 8. "Ground 8" means that the information sought comes within the lawyer-client
3 privilege. (Code Civ. Proc., § 2030.240(b).)

4 9. "Ground 9" means that the information sought is protected work-product under
5 Code of Civil Procedure section 2018.030. (Code Civ. Proc., § 2030.240(b).)

6 10. "Ground 10" means that the Interrogatory is vague, ambiguous and unintelligible.

7 11. "Ground 11" means that the Interrogatory is oppressive, harassing and
8 burdensome.

9 12. "Ground 12" means that the Interrogatory is overbroad.

10 13. "Ground 13" means that the Interrogatory seeks confidential and/or trade secret
11 information.

12 14. "Ground 14" means that the information is protected by the right of privacy.

13 15. "Ground 15" means that the Interrogatory seeks matter protected from premature
14 disclosure by Code of Civil Procedure section 2034.210 et. seq.

15 16. "Ground 16" means that the excessive use of definitions and instructions makes
16 the Interrogatory vague, ambiguous and unintelligible, overly burdensome and oppressive. (See
17 e.g., *Calcor Space Facility v. Superior Court* (1997) 53 Cal.App.4th 216.)

18 **III. GENERAL OBJECTIONS**

19 The Responding Party has not fully completed an investigation of the facts relating to this
20 case, has not completed discovery concerning this case, and has not completed trial preparation.
21 The answers herein disclose only those contentions which presently occur to the Responding
22 Party. It is anticipated that further discovery, investigation, legal research and analysis will
23 supply additional facts, add meaning to the known facts, as well as establish entirely new factual
24 contentions and legal contentions. The following responses are given without prejudice to the
25 Responding Party's right to produce evidence of any subsequently discovered fact or facts which
26 the Responding Party may later recall.
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IV. RESPONSES

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

FORM INTERROGATORY NO. 1.1:

State the name, **ADDRESS**, telephone number, and relationship to you of each **PERSON** who prepared or assisted in the preparation of the responses to these interrogatories. (Do not identify anyone who simply typed or reproduced the responses.)

RESPONSE TO FORM INTERROGATORY NO. 1.1:

Responding Party objects to this form interrogatory on the ground that the responses below consist solely of objections by counsel, who is identified above and below. Accordingly, it is not necessary or appropriate, and would be unduly burdensome, to require Responding Party to provide a verified response identifying the persons who prepared the responses.

FORM INTERROGATORY NO. 17.1

Is your response to each request for admission served with these interrogatories an unqualified admission? If not, for each response that is not an unqualified admission:

- (a) state the number of the request;
- (b) state all facts upon which you base your response;
- (c) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of those facts; and
- (d) identify all **DOCUMENTS** and other tangible things that support your response and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.


1 **RESPONSE TO FORM INTERROGATORY NO. 17.1:**

2 Responding Party objects to this form interrogatory on the ground that Responding Party
3 objected to each Request for Admission on the grounds stated in the Responding Party's
4 responses to the Requests for Admissions. Accordingly, no substantive response to this form
5 interrogatory is appropriate or required.
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7 Dated: January 12, 2018

As to objections only,

8 KUHS & PARKER

9 By 
10 Bernard C. Barmann, Jr., Attorneys for
11 Granite Construction Company
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**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 January 12, 2018, I caused the foregoing document(s) described as **RESPONSE TO LITTLE ROCK SAND AND GRAVEL INC.'S FORM INTERROGATORIES, SET TWO** 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 January 12, 2018, 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.

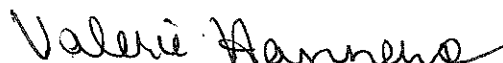
— (BY EMAIL TRANSMISSION) on January 12, 2018, at approximately p.m. to:

— (BY FACSIMILE TRANSMISSION) on January 12, 2018 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 January 12, 2018 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 January 12, 2018 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 January 12, 2018, in Bakersfield, California.


Valerie Hanners