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**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

Coordinated Proceeding,  
Special Title (Rule 1550(b)),

ANTELOPE VALLEY GROUNDWATER  
CASES.

Judicial Council Coordination  
Proceeding No.: 4408  
LASC Case No. BC32501

Santa Clara Superior Court  
Case No.: 1-05-CV-049053

**GRIMMWAY ENTERPRISES, INC.'S  
AMENDED RESPONSES TO JOHNNY  
ZAMRZLA, PAMELLA ZAMRZLA,  
JOHNNY LEE ZAMRZLA AND  
JEANETTE ZAMRZLAS' SPECIAL  
INTERROGATORIES – SET ONE**

PROPOUNDING PARTY: Plaintiff, JOHNNY ZAMRZLA, PAMELLA ZAMRZLA,  
JOHNNY LEE ZAMRZLA AND JEANETTE ZAMRZLA  
RESPONDING PARTY: Defendant, GRIMMWAY ENTERPRISES, INC.  
SET NO.: ONE

**I. INTRODUCTION**

Plaintiffs JOHNNY ZAMRZLA, PAMELLA ZAMRZLA, JOHNNY LEE ZAMRZLA  
and JEANETTE ZAMRZLA (**Propounding Parties**) served Special Interrogatories, Set One  
(**Request**) by electronic mail on defendant GRIMMWAY ENTERPRISES, INC. (**Responding**

1 Party) on May 25, 2022. This is Responding Party's amended responses and objections to the  
2 Request.

## 3 II. DEFINITIONS

4 The following words and phrases, in addition to the words and phrases defined in Part I,  
5 shall govern the construction of these answers and objections unless the context otherwise  
6 requires:

7 1. "Ground 1" means that the matter sought is neither admissible in evidence nor  
8 reasonably calculated to lead to the discovery of admissible evidence. (Code Civ. Proc., §  
9 2017.010.)

10 2. "Ground 2" means that the Interrogatories are not timely. (Code Civ. Proc., §  
11 2024.020.)

12 3. "Ground 3" means that the Interrogatories contain a preface or instruction not  
13 approved under Chapter 17 of the Civil Discovery Act. (Code Civ. Proc., § 2030.060, subd. (d).)

14 4. "Ground 4" means that the Interrogatory is not full and complete in and of itself.  
15 (Code Civ. Proc., § 2030.060, subd. (d).)

16 5. "Ground 5" means that the Interrogatory contains subparts, or a compound,  
17 conjunctive, or disjunctive question. (Code Civ. Proc., § 2030.060, subd. (f).)

18 6. "Ground 6" means that the information sought is equally available to the  
19 Propounding Party. (Code Civ. Proc., § 2030.220, subd. (c).)

20 7. "Ground 7" means that the information sought would necessitate the preparation  
21 or the making of a compilation, abstract, audit, or summary of or from the documents of the  
22 Responding Party and the burden or expense of preparing or making it would be substantially the  
23 same for the Propounding Party as for the Responding Party. (Code Civ. Proc., § 2030.230.)

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

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

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

11. “Ground 11” means that the Interrogatory is oppressive, harassing, and burdensome.

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

13. “Ground 13” means that the Interrogatory seeks confidential or trade secret information.

14. “Ground 14” means that the information is protected by the right of privacy.

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

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

### III. GENERAL OBJECTIONS

Responding Party has not fully investigated the facts of this case, has not completed discovery in this case, and has not completed trial preparation. The responses below disclose only those contentions that presently occur to Responding Party. Further discovery, investigation, legal research, and analysis may supply more facts, add meaning to the known facts, and establish new factual and legal contentions. The responses below are given without prejudice to Responding Party's right to produce evidence of any later discovered fact or facts that Responding Party may later recall.

## IV. RESPONSES

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

**RESPONSE TO SPECIAL INTERROGATORY NO. 9:**

Objection on Grounds 1, 6, 10, 12 and 15. Discovery is just beginning, and the Responding party has not completed the deposition of Rich Koch and other witnesses, and therefore lacks sufficient information to form a contention. Without waiving such objections, approximately 294 acre-feet in 2006.

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**RESPONSE TO SPECIAL INTERROGATORY NO. 10:**

Objection on Grounds 1, 10 and 12. Without waiving such objections, the Responding Party farmed a portion of the Propounding Party’s land in 2006 and grew carrots. Discovery is continuing.

Dated: September 30, 2022

LeBEAU THELEN, LLP

By:   
Robert G. Kuhs, Esq.  
GRIMMWAY ENTERPRISES, INC.

**VERIFICATION**

STATE OF CALIFORNIA, COUNTY OF KERN

I have read the foregoing **GRIMMWAY ENTERPRISES, INC.'S AMENDED RESPONSE TO JOHNNY ZAMRZLA, PAMELLA ZAMRZLA, JOHNNY LEE ZAMRZLA AND JEANETTE ZAMRZLAS' SPECIAL INTERROGATORIES – SET ONE** and know its contents.

**XX** I am the **Land Manager for Grimmway Enterprises, Inc.** a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. I am informed and believe, and on that ground allege, that the matters stated in the foregoing document are true.

Executed on September 30, 2022, at Bakersfield, California.

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

CARL F. VOSS, JR.

Type or Print Name



Signature

**PROOF OF SERVICE**

**STATE OF CALIFORNIA     )**  
**)**     **SS**  
**COUNTY OF KERN            )**

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen (18) years and not a party to the within-entitled action. My business address is 5001 E. Commercenter Drive, Suite 300, Bakersfield, California 93309. On **September 30, 2022**, I served the within document(s):

**GRIMMWAY ENTERPRISES, INC.'S AMENDED RESPONSES TO JOHNNY ZAMRZLA, PAMELLA ZAMRZLA, JOHNNY LEE ZAMRZLA AND JEANETTE ZAMRZLAS' SPECIAL INTERROGATORIES – SET ONE**

☒ **BY ELECTRONIC SERVICE:** I caused said document(s) to be transmitted to the email address(es) of the addressee(s) designated by posting the document(s) listed above to the Antelope Valley Groundwater Cases to all parties listed on the Santa Clara Superior Court Service List as maintained via Glotrans. Electronic service completed through <http://www.avwatermaster.org>.

☐ **BY OVERNIGHT COURIER:** By causing the document(s) listed above to be picked up by an overnight courier service company for delivery to the address(es) listed below on the next business day.

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

Executed on **September 30, 2022**, at Bakersfield, California.

  
\_\_\_\_\_  
TILLIE CORONADO