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6 Attorney for Quartz Hill Water District
7 Defendant/Cross Complainant

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA

9 FOR THE COUNTY OF LOS ANGELES

10 ANTELOPE VALLEY GROUNDWATER
11 CASES

12 Included Actions:

13 Los Angeles County Waterworks District No.
14 40 v. Diamond Farming Co.
15 Superior Court of California, County of Los
16 Angeles, Case No. BC325201;

17 Los Angeles County Waterworks District
18 No. 40 v. Diamond Farming Co.
19 Superior Court of California
20 County of Kern, Case No. S-1500-CV-254-
21 348;

22 Wm. Bolthouse Farms, Inc. v. City of
23 Lancaster
24 Diamond Farming Co. v. City of Lancaster
25 Diamond Farming Co. v. Palmdale Water Dist.
26 Superior Court of California
27 County of Riverside, consolidated actions
28 Case Nos. RIC 353840, RIC 344436,
RIC 344668.

**Judicial Council Coordination Proceeding
No. 4408**

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

Date: February 14, 2012
Time: 9:00 a.m.
Location: Room 1515
Judge Jack Komar

Declaration of Bradley T. Weeks in support of
Motion to:

1. Compel Answers to Special Interrogatories
2. Compel Answers to Form Interrogatories
3. Deem the Truth of Matters Admitted and Conclusively Established
4. Compel Responses to Demand for Production Document

For Order Reserving Award Monetary Sanctions

1 I, Bradley T. Weeks, declare as follows.

2 1. If called to testify as a witness in the above mentioned matter, I could
3 competently testify to the following matters, which are within my personal knowledge.

4 2. I am an attorney licensed to practice law in the State of California I
5 represent Quartz Hill Water District in this matter.

6 3. On the dated indicated below, I caused there to be served, by electronic
7 service, the following discovery demands:

<u>Type</u>	<u>Exhibit Number</u>	<u>Service Date</u>	<u>Set Number</u>
Form Interrogatories	One	November 10, 2011	One
Request for Production	Two	November 10, 2011	One
Special Interrogatories	Three	November 10, 2011	One
Request For Admission	Four	November 10, 2011	One
Request For Admission	Five	November 11, 2011	Two
Form Interrogatories	Six	November 11, 2011	Two

15 4. Each discovery demand is attached to this declaration as the exhibit number
16 set forth above. The last page of each exhibit is the filing receipt I received from the Santa
17 Clara Superior Court.

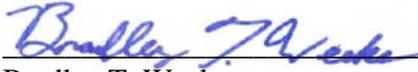
18 5. I served the above discovery by posting it to the Santa Clara Superior Court
19 website. The discovery was initially directed against numerous parties. This motion is only
20 brought against parties who have registered with the Santa Clara Superior Court. I have
21 personally reviewed the court's E-Service list and have confirmed that every party against
22 whom the discovery was served, and against whom this motion is brought, is on that list.

23 6. The court may observe there are other parties against whom discovery was
24 served. No relief is requested against those parties in this motion.

25 7. As a result of parties failure to respond with the discovery demands, the
26 party Quartz Hill Water District represent has incurred and will incur reasonable costs and
27 attorney's fees in connection with this motion and the hearing thereon. Due to the large
28

1 number of parties this motion is directed against, I request this issue be deferred by the
2 court to a time that is just.

3
4 Date: December 10, 2012

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6 _____
7 Bradley T. Weeks

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PROOF OF SERVICE

I am employed in the aforesaid county, State of California; I am over eighteen years of age and not a party to the within action; my business address is 1031 West Avenue M-14, Suite A, Palmdale, California, 93551.

On January 10, 2012, at my place of business at Palmdale, California, a copy of the following DOCUMENT(s):

- Declaration of Bradley T. Weeks in support of Motion to:**
- 1. Compel Answers to Special Interrogatories**
 - 2. Compel Answers to Form Interrogatories**
 - 3. Deem the Truth of Matters Admitted and Conclusively Established**
 - 4. Compel Responses to Demand for Production Document**

For Order Reserving Award Monetary Sanctions

By posting the DOCUMENT listed above to the Santa Clara Superior Court website in regard to the Antelope Valley Groundwater Matter:

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

Executed on January 10, 2012

/s/Gayle Fenald