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Exempt from filings fees under
Government Code Section 6103

Attorney for Quartz Hill Water District
Defendant/Cross Complainant

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

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. BC325201;

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. City of Lancaster
Diamond Farming Co. v. Palmdale Water Dist.
Superior Court of California
County of Riverside, consolidated actions
Case Nos. RIC 353840, RIC 344436,
RIC 344668.

**Judicial Council Coordination Proceeding
No. 4408**

OPPOSITION TO "AGWA" PROPOSED
THIRD AMENDMENT TO CASE
MANAGEMENT ORDER FOR PHASE
FOUR TRIAL

1 Quartz Hill Water District objects to the self-designated "AGWA" proposed Third
2 Amendment to Case Management Order for Phase Four trial as follows:

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4 **I. THE PROPOSED ORDER DOES NOT CONFORM TO THE ORDER**
5 **STATED BY THE COURT**

6 At the hearing on March 1, 2013, this court stated that a party noticing a deposition would
7 also need to state the general grounds of the deposition, analogous to the procedure for a deponent
8 who is not a natural person, *aka* a person most knowledgeable.

9 The court expressed an intention to limit the examination of the upcoming depositions to
10 the subject matters of the Phase 4 trial.

11 The proposed order proposed by the "AGWA" group does not conform to the specific
12 requirements of the court's order on March 1st. Nor does the proposed order set forth the intention
13 of the court to limit the scope of the depositions to the matters of the Phase 4 trial.

14 The proposed order requires that all deposition notices for overlying parties specify by
15 declaration item number the topics which the deposition questions will address and the nature of
16 the inquiry. This is improper, and is the equivalent to requiring a party to provide the questions to
17 the deponents ahead of time.

18 It is also unduly restrictive and will cause the undue consumption of time. Parties will need
19 to review each paragraph of the declaration before sending the depositions notice, even if, based
20 upon other factors, that witness will be deposed. If issues arise during the deposition that relate to
21 a paragraph that was not specified, then the implication of this order is that the deposition would
22 need to be continued, to give time to re-notice on that issue.

23 This court order should simply require the deposition notice to describe with reasonable
24 particularity the matters on which examination is requested. The examination should be limited to
25 the subject matters of the Phase 4 trial.

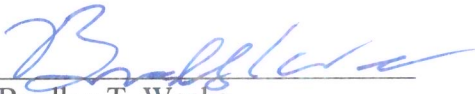
26 An alternative proposed order amending the case management order is included with this
27 opposition.
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Respectively submitted

CHARLTON WEEKS LLP

Dated: March 8, 2013


Bradley T. Weeks
Attorney for Quartz Hill Water District

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.

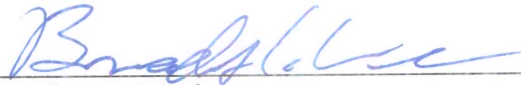
On March 8, 2013, at my place of business at Palmdale, California, a copy of the following DOCUMENT(s):

OPPOSITION TO "AGWA" PROPOSED THIRD AMENDMENT TO CASE MANAGEMENT ORDER FOR PHASE FOUR TRIAL

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 March 8, 2013


Bradley T. Weeks