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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

**Judicial Council Coordination Proceeding  
No. 4408**

Included Actions:

**OBJECTION TO NOTICE OF DEPOSITION  
OF CHAD REED**

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.

1 To Tejon Ranchcorp, Granite Construction Company, and all other parties, and its  
2 attorneys of record:

3  
4 PLEASE TAKE NOTICE that Quartz Hill Water District objects to Tejon Ranchcorp's and  
5 Granite Construction Company's, notice of deposition and request for production of documents on  
6 the grounds as stated below.

7  
8 Mr. Reed will appear as required in the notice of deposition, but will not comply with the  
9 document production request contained in the Notice of Deposition.

10  
11 OBJECTIONS

12 Request 1.

13 This request is overbroad, oppressive, and burdensome, vague and ambiguous. This request calls  
14 for the production of irrelevant information and documents that exceed the scope of the phase 4  
15 trial.

16 Request 2.

17 This request is overbroad, oppressive, and burdensome, vague and ambiguous. This request calls  
18 for the production of irrelevant information and documents that exceed the scope of the phase 4  
19 trial.

20 Request 3.

21 This request is overbroad, oppressive, and burdensome, vague and ambiguous. This request calls  
22 for the production of irrelevant information and documents that exceed the scope of the phase 4  
23 trial. This request calls for documents previously posted to the Superior Court of California,  
24 County of Santa Clara, e-filing web site, and are equally available to all parties.

25 Request 4.

26 This request is overbroad, oppressive, and burdensome, vague and ambiguous. This request calls  
27 for the production of irrelevant information and documents that exceed the scope of the phase 4  
28

1 trial. This request calls for documents previously posted to the Superior Court of California,  
2 County of Santa Clara, e-filing web site, and are equally available to all parties.

3 Request 5.

4 This request is overbroad, oppressive, and burdensome, vague and ambiguous. This request calls  
5 for the production of irrelevant information and documents that exceed the scope of the phase 4  
6 trial. This request calls for documents previously posted to the Superior Court of California,  
7 County of Santa Clara, e-filing web site, and are equally available to all parties.

8 Request 6.

9 This request is overbroad, oppressive, and burdensome, vague and ambiguous. This request calls  
10 for the production of irrelevant information and documents that exceed the scope of the phase 4  
11 trial.

12 Request 7.

13 This request is overbroad, oppressive, and burdensome, vague and ambiguous. This request calls  
14 for the production of irrelevant information and documents that exceed the scope of the phase 4  
15 trial.

16 Request 8.

17 This request is overbroad, oppressive, and burdensome, vague and ambiguous. This request calls  
18 for the production of irrelevant information and documents that exceed the scope of the phase 4  
19 trial.

20 Request 9.

21 This request is overbroad, oppressive, and burdensome, vague and ambiguous. This request calls  
22 for the production of irrelevant information and documents that exceed the scope of the phase 4  
23 trial.

24 Request 10.

25 This request is overbroad, oppressive, and burdensome, vague and ambiguous. This request calls  
26 for the production of irrelevant information and documents that exceed the scope of the phase 4  
27 trial. This request calls for documents previously posted to the Superior Court of California,  
28 County of Santa Clara, e-filing web site, and are equally available to all parties.



Request 11.

This request is overbroad, oppressive, and burdensome, vague and ambiguous. This request calls for the production of irrelevant information and documents that exceed the scope of the phase 4 trial. This request calls for documents previously posted to the Superior Court of California, County of Santa Clara, e-filing web site, and are equally available to all parties.

Request 12.

This request is overbroad, oppressive, and burdensome, vague and ambiguous. This request calls for the production of irrelevant information and documents that exceed the scope of the phase 4 trial. This request calls for documents previously posted to the Superior Court of California, County of Santa Clara, e-filing web site, and are equally available to all parties.

Request 13.

This request is overbroad, oppressive, and burdensome, vague and ambiguous. This request calls for the production of irrelevant information and documents that exceed the scope of the phase 4 trial. This request calls for documents previously posted to the Superior Court of California, County of Santa Clara, e-filing web site, and are equally available to all parties.


Request 14.

This request is overbroad, oppressive, and burdensome, vague and ambiguous. This request calls for the production of irrelevant information and documents that exceed the scope of the phase 4 trial. This request calls for documents previously posted to the Superior Court of California, County of Santa Clara, e-filing web site, and are equally available to all parties.

Respectively submitted

CHARLTON WEEKS LLP

Dated: March 14, 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.

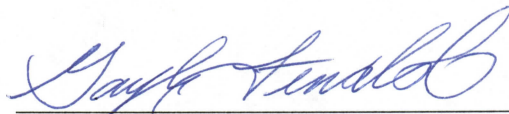
On March 14, 2013, at my place of business at Palmdale, California, a copy of the following DOCUMENT(s):

OPPOSITION TO APPLICATION TO AMEND CASE MANAGEMENT ORDER

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 14, 2013



Gayle P.J. Fenald