

BRADLEY T. WEEKS, Bar No. 173745
CHARLTON WEEKS LLP
1031 West Avenue M-14, Suite A
Palmdale, CA 93551
(661) 265-0969
www.charltonweeks.com

Exempt from filings fees under
Government Code Section 6103

[See Next Page For Additional Counsel]

Attorney for Quartz Hill Water District
Defendant/Cross Complainant

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES-CENTRAL DISTRICT

ANTELOPE VALLEY GROUNDWATER
CASES

**Judicial Council Coordination Proceeding
No. 4408**

Included Actions:

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

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

**PUBLIC WATER SUPPLIER NOTICE OF
DEPOSITION**

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.

Deponent: Ramin Zomorodi
Date: 04/19/13
Time: 9:00 AM

PUBLIC WATER SUPPLIER NOTICE OF DEPOSITION

Deponent: Ramin Zomorodi
Date: 4/19/2013
Time: 9:00 AM

BEST BEST & KRIEGER LLP

ERIC L. GARNER, Bar No. 130665

JEFFREY V. DUNN, Bar No. 131926

STEFANIE D. MORRIS, Bar No. 239787

18101 VON KARMAN, SUITE 1000

IRVINE, CALIFORNIA 92612

TELEPHONE: (949) 263-2600

TELECOPIER: (949) 260-0972

Attorneys for Cross-Complainant

LOS ANGELES COUNTY WATERWORKS DISTRICT NO. 40

OFFICE OF COUNTY COUNSEL

COUNTY OF LOS ANGELES

JOHN F. KRATTLI, Bar No. 82149

COUNTY COUNSEL

WARREN WELLEN, Bar No. 139152

PRINCIPAL DEPUTY COUNTY COUNSEL

500 WEST TEMPLE STREET

LOS ANGELES, CALIFORNIA 90012

TELEPHONE: (213) 974-8407

TELECOPIER: (213) 687-7337

Attorneys for Cross-Complainant LOS ANGELES COUNTY WATERWORKS DISTRICT NO. 40

LEMIEUX & O'NEILL

Wayne Lemieux, Bar No. 43501

2393 Townsgate Road, Ste. 201

Westlake Village, CA 91361

(805) 495-4770 (805) 495-2787 fax

Attorneys for Littlerock Creek Irrigation District and
Palm Ranch Irrigation District

LAGERLOF SENEAL GOSNEY & KRUSE

Thomas Bunn III, Bar No. 89502

301 North Lake Avenue, 10th Floor

Pasadena, CA 91101-4108

(626) 793-9400 (626) 793-5900 fax

Attorneys for Palmdale Water District

PUBLIC WATER SUPPLIER NOTICE OF DEPOSITION

Deponent: Ramin Zomorodi

Date: 4/19/2013

Time: 9:00 AM

1 TO ALL INTERESTED PARTIES AND THEIR ATTORNEY OF RECORD:

2 PLEASE TAKE NOTICE THAT THE DEPOSITION OF Ramin Zomorodi will be taken
3 on 4/19/2013, commencing at 9:00 AM at the offices of Veritext, 707 Wilshire Boulevard, Suite
4 3500, Los Angeles, California, 90017, upon oral examination before a Certified Shorthand
5 Reporter. This noticing party also intends to record the testimony by audio technology, video
6 technology, and the testimony by stenographic method through the instant visual display of the
7 testimony.

8 Said deposition will continue from day to day, excluding Sundays and holidays, until
9 complete. Please note: If an interpreter is needed and/or desired by the deponent, it is requested
10 that the undersigned be notified no later than five (5) days before the date of the deposition.

11 YOU ARE FURTHER NOTIFIED THAT:

12 The deponent is required to produce the following documents, records, or other materials
13 at the deposition:

14 **DEFINITIONS**

15 "BASIN" BASIN shall be defined as on and below the ground surface within the
16 jurisdictional area defined by the court in this matter by order dated March 16, 2007.

17 "DOCUMENT" shall be defined as and have the same broad meaning as it has in
18 California Evidence Code § 250 and Code of Civil Procedure §2031.010 et seq. and includes
19 documents, papers, books, accounts, letters, records, photographs, objects, and all other tangible
20 things. It includes all forms of written communication. It specifically includes all originals,
21 copies, duplicates, drafts, or other recordings of any written, graphic, or otherwise recorded
22 matter, however produced or reproduced, whether inscribed by hand or by mechanical, electronic,
23 microfilm, photographic, phonic, or any other means. It includes abstracts; address books;
24 advertisements; affidavits or statements; agreements; analyses of any kind; appointment books;
25 architectural blueprints or drawings; balance sheets; bids; billings; blueprints; books or records of
26 account; purchase orders; work papers; brochures; bulletins; calendars; charts; checks and
27 canceled checks; circulars; compilations; computer cards, runs, and printouts; computer programs;

PUBLIC WATER SUPPLIER NOTICE OF DEPOSITION

Deponent: Ramin Zomorodi
Date: 4/19/2013
Time: 9:00 AM

1 computer tapes and discs; consultants' reports or studies; contracts; correspondence; data
2 processing input and output; data sheets; desk calendars; diagrams; diaries; directories; discs;
3 drawings; estimates; expense account records; experts' reports or studies; financial statements or
4 calculations; graphs; house publications; income statements; inspection records, sheets, and
5 reports; interoffice and intra-office communications; invoices; job descriptions or assignments;
6 journals; layouts; ledgers; letters; licenses; lists; magnetic tapes; manuals; maps; memorandums of
7 any kind; microfiche; microfilm; minutes or records of any kind; movies; notations; notes;
8 notebooks; opinions; organizational charts; pamphlets; permits; photographs; pictures; plans;
9 projections; promotional materials; press releases or clippings; publications; punch cards;
10 procedures; questionnaires and answers to them; quotations; records and recordings of any kind;
11 renderings; reports of any kind; rework instructions, orders, and procedures; routing slips;
12 schedules; sound recordings; specifications; statistical analyses; stenographers' notebooks; studies
13 of any kind, analyses, forecasts, and evaluations; subcontracts; summaries; surveys; tables,
14 indices, and lists; tabulations; tallies; tapes; telegrams; cables; telephone messages, telephone logs,
15 and telephone billings and statements; teletype and telex messages; trade letters; transcripts,
16 minutes, reports, and recordings of telephone or other conversations, interviews, conferences,
17 committee meetings, or other meetings; undertakings; video tapes; vouchers; and working
18 drawings, papers, and files.

19 “YOU” or “YOUR” shall mean Ramin Zomorodi, and shall also include all representatives
20 and agents of Ramin Zomorodi, predecessors or successors in interest, and all other PERSONS
21 acting or purporting to act on behalf of respondent to this notice.

22 All documents produced by YOU pursuant to a verified response to the Discovery Order
23 For Phase 4 Trial issued by the Honorable Jack Komar December 12, 2012 and posted to the Santa
24 Clara Superior Court in the Antelope Valley Groundwater Litigation, are excluded from this
25 request.

PUBLIC WATER SUPPLIER NOTICE OF DEPOSITION

Deponent: Ramin Zomorodi
Date: 4/19/2013
Time: 9:00 AM

REQUESTS FOR PRODUCTION

Request for Production Number 1.

Produce all DOCUMENTS identified in YOUR response to the Discovery Order For Phase 4 Trial issued by the Honorable Jack Komar December 12, 2012.

Request for Production Number 2.

If YOU contend that the groundwater YOU pumped in the years 2011 and 2012 are not representative of YOUR current pumping, produce all DOCUMENTS THAT relate to YOUR current pumping.

Request for Production Number 3.

Produce all groundwater pump meter records for all groundwater YOU pumped in the BASIN from January 1, 2000 through December 31, 2004 from real property YOU own or lease in the BASIN.

Request for Production Number 4.

Produce all groundwater pump meter records for all groundwater YOU pumped in the BASIN after December 31, 2010 from real property YOU own or lease in the BASIN.

Request for Production Number 5.

Produce all groundwater pump electrical meter records from January 1, 2000 through December 31, 2004 from real property YOU own or lease in the BASIN.

Request for Production Number 6.

Produce all electrical meter records for all groundwater YOU pumped in the BASIN after December 31, 2010 from real property YOU own or lease in the BASIN.

Request for Production Number 7.

Produce all groundwater pump diesel records from January 1, 2000 through December 31, 2004 from real property YOU own or lease in the BASIN.

Request for Production Number 8.

Produce all groundwater pump diesel records for all groundwater YOU pumped in the BASIN after December 31, 2010 from real property YOU own or lease in the BASIN.

Request for Production Number 9.

Produce all DOCUMENTS which indicate the amount of groundwater pumped from January 1, 2000 through December 31, 2004 from real property YOU own ore lease in the BASIN.

Request for Production Number 10.

Produce all DOCUMENTS which indicate the amount of groundwater pumped from after December 31, 2010 from real property YOU own ore lease in the BASIN.

Request for Production Number 11.

Produce all tests that relate to groundwater pumps that are located in the BASIN, wherein the tests were performed after December 31, 1982. Included in this request are all pump tests that are used by YOU to calculate the amount of groundwater pumped. Also included is any test that has any of the following information: (1) Standing water level; (2) Drawdown; (3) Discharge; (4) Total Head; Capacity; (5) Acre Feed Pumped ; kW input to Motor; (6) kWh per Acre Foot; (7) Overall Plant Efficiency.

Request for Production Number 12.

1 Produce all DOCUMENTS which relate to YOUR calculation of the amount of groundwater
2 pumped or used by YOU or YOUR predecessors in the BASIN since December 31, 1999 from
3 real property YOU own in the BASIN, with the exception of the years 2005 through 2010.

4
5 **Request for Production Number 13.**

6 Produce all First and Annual Notices for Groundwater Extraction YOU have filed with the
7 California State Water Reassurances Control Board for all groundwater pumped in the BASIN
8 since December 31, 1999.

9
10 **Request for Production Number 14.**

11 Produce all First and Annual Notices for Groundwater Extraction YOU have filed with Los
12 Angeles County for all groundwater pumped in the BASIN since December 31, 1999.

13
14 **Request for Production Number 15.**

15 For the year 2011, all DOCUMENTS that reflect the following:

- 16 a) For each parcel of property YOU owned or leased, the amount of acres of crops grown on
17 that parcel and the type of crop.
- 18 b) The total amount of water used on each parcel.
- 19 c) The total amount of groundwater used on each parcel.
- 20 d) For each crop identified above the amount of crop produced on each parcel for the year
21 2011.
- 22 e) For each crop identified above, the amount of water per acre used for that crop.
- 23 f) All DOCUMENTS that relate to the amount of water used by YOU to for all purposes for all
24 agriculture in the BASIN.

25
26 **Request for Production Number 16.**

27 For the year 2012, all DOCUMENTS that reflect the following:

PUBLIC WATER SUPPLIER NOTICE OF DEPOSITION

Deponent: Ramin Zomorodi
Date: 4/19/2013
Time: 9:00 AM

- a) For each parcel of property YOU owned or leased, the amount of acres of crops grown on that parcel and the type of crop.
- b) The total amount of water used on each parcel.
- c) The total amount of groundwater used on each parcel.
- d) For each crop identified above the amount of crop produced on each parcel for the year 2011.
- e) For each crop identified above, the amount of water per acre used for that crop.
- f) All DOCUMENTS that relate to the amount of water used by YOU to for all purposes for all agriculture in the BASIN.

Request for Production Number 17.

All DOCUMENTS that show how groundwater is used by YOU in the mining of minerals from the BASIN, and the separation, and processing of the minerals.


Request for Production Number 18.

Produce all DOCUMENTS that indicate how much groundwater any party to this ligation, other than YOU, has pumped in the BASIN since 1945. Documents provided by other parties pursuant to pervious discovery demands, responses to expert witness designations, or disclosed in any previous phase of trial need not be provided.

To the extent the court's March 7, 2013 order applies to this deposition, the additional information required will be provided by supplement.

Dated: March 22, 2013

CHARLTON WEEKS LLP



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 22, 2013, at my place of business at Palmdale, California, a copy of the following DOCUMENT(s):

PUBLIC WATER SUPPLIER NOTICE OF DEPOSITION

By posting the DOCUMENT listed above to the Santa Clara Superior Court website in regard to the Antelope Valley Groundwater Matter. All parties listed on the Santa Clara Superior Court in regard to the Antelope Valley Groundwater Matter are hereby incorporated here at by this reference.

Deponent: Ramin Zomorodi

Date: 4/19/2013

Time: 9:00 AM

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

Dated: March 22, 2013

CHARLTON WEEKS LLP



Bradley T. Weeks

Attorney for Quartz Hill Water District