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Exempt from filing fee  
Government Code § 6103

Attorneys for Defendant/Cross-Complainant and  
Cross-Defendant CITY OF LANCASTER

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. BC 325 201;

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 353 840, RIC 344 436, RIC 344 668.

Judicial Council Coordination  
Proceeding No. 4408

**CLASS ACTION**

Santa Clara Case No. 1-05-CV 049053  
Assigned to The Honorable Jack Komar

**CITY OF LANCASTER'S  
OBJECTIONS TO DIAMOND  
FARMING COMPANY'S REQUEST  
FOR ADMISSIONS, SET ONE**

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1 **PROPOUNDING PARTY:** DIAMOND FARMING COMPANY  
2 **RESPONDING PARTY:** CITY OF LANCASTER ("CITY")  
3 **SET NO.:** ONE  
4  
5

6 **GENERAL OBJECTIONS**  
7

8 A. The City objects to the requests for admissions to the extent they intrude into  
9 confidential communications covered by the attorney-client privilege, and they intrude into  
10 confidential material covered by the attorney work-product privilege. This objection applies  
11 equally to each and every request for admission served on the City.  
12

13 **RESPONSE TO REQUEST FOR ADMISSIONS**  
14

15 **OBJECTION TO REQUEST NO. 1:**

16 Objection. This request is not reasonably calculated to lead to the discovery of  
17 admissible evidence. The request is manifestly irrelevant and calculated to harass.  
18

19 **OBJECTION TO REQUEST NO. 2:**

20 Lancaster admits it is a municipal corporation.  
21

22 **OBJECTION TO REQUEST NO. 3:**

23 Objection. The request is premature, burdensome and oppressive. This request seeks  
24 information concerning class members and the court has not yet completed its class certification  
25 process. No class representative has yet been approved by the court.  
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1 **OBJECTION TO REQUEST NO. 4:**

2       Objection. The request is premature, burdensome and oppressive. This request seeks  
3 information concerning class members and the court has not yet completed its class certification  
4 process. No class representative has yet been approved by the court.  
5

6 **OBJECTION TO REQUEST NO. 5:**

7       Objection. The request is premature, burdensome and oppressive. This request seeks  
8 information concerning class members and the court has not yet completed its class certification  
9 process. No class representative has yet been approved by the court.  
10

11 **OBJECTION TO REQUEST NO. 6:**

12       Objection. The request is premature, burdensome and oppressive. This request seeks  
13 information concerning class members and the court has not yet completed its class certification  
14 process. No class representative has yet been approved by the court.  
15

16 **OBJECTION TO REQUEST NO. 7:**

17       Objection. The request is premature, burdensome and oppressive. This request seeks  
18 information concerning class members and the court has not yet completed its class certification  
19 process. No class representative has yet been approved by the court.  
20

21 **OBJECTION TO REQUEST NO. 8:**

22       Objection. The request is premature, burdensome and oppressive. This request seeks  
23 information concerning class members and the court has not yet completed its class certification  
24 process. No class representative has yet been approved by the court.  
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1 **OBJECTION TO REQUEST NO. 9:**

2       Objection. The request is premature, burdensome and oppressive. This request seeks  
3 information concerning class members and the court has not yet completed its class certification  
4 process. No class representative has yet been approved by the court.  
5

6 **OBJECTION TO REQUEST NO. 10:**

7       Objection. The request is premature, burdensome and oppressive. This request seeks  
8 information concerning class members and the court has not yet completed its class certification  
9 process. No class representative has yet been approved by the court.  
10

11 **OBJECTION TO REQUEST NO. 11:**

12       Objection. The request is premature, burdensome and oppressive. This request seeks  
13 information concerning class members and the court has not yet completed its class certification  
14 process. No class representative has yet been approved by the court.  
15

16 **OBJECTION TO REQUEST NO. 12:**

17       Objection. The request is premature, burdensome and oppressive. This request seeks  
18 information concerning class members and the court has not yet completed its class certification  
19 process. No class representative has yet been approved by the court.  
20

21 **OBJECTION TO REQUEST NO. 13:**

22       Objection. The request is premature, burdensome and oppressive. This request seeks  
23 information concerning class members and the court has not yet completed its class certification  
24 process. No class representative has yet been approved by the court.  
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1 **OBJECTION TO REQUEST NO. 14:**

2       Objection. The request is premature, burdensome and oppressive. This request seeks  
3 information concerning class members and the court has not yet completed its class certification  
4 process. No class representative has yet been approved by the court.  
5

6 **OBJECTION TO REQUEST NO. 15:**

7       Objection. The request is premature, burdensome and oppressive. This request seeks  
8 information concerning class members and the court has not yet completed its class certification  
9 process. No class representative has yet been approved by the court.  
10

11 **OBJECTION TO REQUEST NO. 16:**

12       Objection. The request is premature, burdensome and oppressive. This request seeks  
13 information concerning class members and the court has not yet completed its class certification  
14 process. No class representative has yet been approved by the court.  
15

16 **OBJECTION TO REQUEST NO. 17:**

17       Objection. The request is premature, burdensome and oppressive. This request seeks  
18 information concerning class members and the court has not yet completed its class certification  
19 process. No class representative has yet been approved by the court.  
20

21 **OBJECTION TO REQUEST NO. 18:**

22       Objection. The request is premature, burdensome and oppressive. This request seeks  
23 information concerning class members and the court has not yet completed its class certification  
24 process. No class representative has yet been approved by the court.  
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1 **OBJECTION TO REQUEST NO. 19:**

2       Objection. The request is premature, burdensome and oppressive. This request seeks  
3 information concerning class members and the court has not yet completed its class certification  
4 process. No class representative has yet been approved by the court.

5  
6 **OBJECTION TO REQUEST NO. 20:**

7       Objection. The request is premature, burdensome and oppressive. This request seeks  
8 information concerning class members and the court has not yet completed its class certification  
9 process. No class representative has yet been approved by the court.

10  
11 **OBJECTION TO REQUEST NO. 21:**

12       Objection. The request is premature, burdensome and oppressive. This request seeks  
13 information concerning class members and the court has not yet completed its class certification  
14 process. No class representative has yet been approved by the court.

15  
16 **OBJECTION TO REQUEST NO. 22:**

17       Objection. The request is premature, burdensome and oppressive. This request seeks  
18 information concerning class members and the court has not yet completed its class certification  
19 process. No class representative has yet been approved by the court.

20  
21 **OBJECTION TO REQUEST NO. 23:**

22       Objection. The request is premature, burdensome and oppressive. This request seeks  
23 information concerning class members and the court has not yet completed its class certification  
24 process. No class representative has yet been approved by the court.

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1 **OBJECTION TO REQUEST NO. 24:**

2       Objection. The request is premature, burdensome and oppressive. This request seeks  
3 information concerning class members and the court has not yet completed its class certification  
4 process. No class representative has yet been approved by the court.  
5

6 **OBJECTION TO REQUEST NO. 25:**

7       Objection. The request is premature, burdensome and oppressive. This request seeks  
8 information concerning class members and the court has not yet completed its class certification  
9 process. No class representative has yet been approved by the court.  
10

11 **OBJECTION TO REQUEST NO. 26:**

12       Objection. The request is premature, burdensome and oppressive. This request seeks  
13 information concerning class members and the court has not yet completed its class certification  
14 process. No class representative has yet been approved by the court.  
15

16 **OBJECTION TO REQUEST NO. 27:**

17       Objection. The request is premature, burdensome and oppressive. This request seeks  
18 information concerning class members and the court has not yet completed its class certification  
19 process. No class representative has yet been approved by the court.  
20

21 **OBJECTION TO REQUEST NO. 28:**

22       Objection. The request is premature, burdensome and oppressive. This request seeks  
23 information concerning class members and the court has not yet completed its class certification  
24 process. No class representative has yet been approved by the court.  
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1 **OBJECTION TO REQUEST NO. 29:**

2       Objection. The request is premature, burdensome and oppressive. This request seeks  
3 information concerning class members and the court has not yet completed its class certification  
4 process. No class representative has yet been approved by the court.  
5

6 **OBJECTION TO REQUEST NO. 30:**

7       Objection. The request is premature, burdensome and oppressive. This request seeks  
8 information concerning class members and the court has not yet completed its class certification  
9 process. No class representative has yet been approved by the court.  
10

11 **OBJECTION TO REQUEST NO. 31:**

12       Objection. The request is premature, burdensome and oppressive. This request seeks  
13 information concerning class members and the court has not yet completed its class certification  
14 process. No class representative has yet been approved by the court.  
15

16 **OBJECTION TO REQUEST NO. 32:**

17       Objection. The request is premature, burdensome and oppressive. This request seeks  
18 information concerning class members and the court has not yet completed its class certification  
19 process. No class representative has yet been approved by the court.  
20

21 **OBJECTION TO REQUEST NO. 33:**

22       Objection. The request is premature, burdensome and oppressive. This request seeks  
23 information concerning class members and the court has not yet completed its class certification  
24 process. No class representative has yet been approved by the court.  
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1 **OBJECTION TO REQUEST NO. 34:**

2       Objection. The request is premature, burdensome and oppressive. This request seeks  
3 information concerning class members and the court has not yet completed its class certification  
4 process. No class representative has yet been approved by the court.  
5

6 **OBJECTION TO REQUEST NO. 35:**

7       Objection. The request is premature, burdensome and oppressive. This request seeks  
8 information concerning class members and the court has not yet completed its class certification  
9 process. No class representative has yet been approved by the court.  
10

11 **OBJECTION TO REQUEST NO. 36:**

12       Objection. The request is premature, burdensome and oppressive. This request seeks  
13 information concerning class members and the court has not yet completed its class certification  
14 process. No class representative has yet been approved by the court.  
15

16 **OBJECTION TO REQUEST NO. 37:**

17       Objection. The request is premature, burdensome and oppressive. This request seeks  
18 information concerning class members and the court has not yet completed its class certification  
19 process. No class representative has yet been approved by the court.  
20

21 **OBJECTION TO REQUEST NO. 38:**

22       Objection. The request is premature, burdensome and oppressive. This request seeks  
23 information concerning class members and the court has not yet completed its class certification  
24 process. No class representative has yet been approved by the court.  
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1 **OBJECTION TO REQUEST NO. 39:**

2       Objection. The request is premature, burdensome and oppressive. This request seeks  
3 information concerning class members and the court has not yet completed its class certification  
4 process. No class representative has yet been approved by the court.  
5

6 **OBJECTION TO REQUEST NO. 40:**

7       Objection. The request is premature, burdensome and oppressive. This request seeks  
8 information concerning class members and the court has not yet completed its class certification  
9 process. No class representative has yet been approved by the court.  
10

11 **OBJECTION TO REQUEST NO. 41:**

12       Objection. The request is premature, burdensome and oppressive. This request seeks  
13 information concerning class members and the court has not yet completed its class certification  
14 process. No class representative has yet been approved by the court.  
15

16 **OBJECTION TO REQUEST NO. 42:**

17       Objection. The request is premature, burdensome and oppressive. This request seeks  
18 information concerning class members and the court has not yet completed its class certification  
19 process. No class representative has yet been approved by the court.  
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21 **OBJECTION TO REQUEST NO. 43:**

22       Objection. The request is premature, burdensome and oppressive. This request seeks  
23 information concerning class members and the court has not yet completed its class certification  
24 process. No class representative has yet been approved by the court.  
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1 **OBJECTION TO REQUEST NO. 44:**

2       Objection. The request is premature, burdensome and oppressive. This request seeks  
3 information concerning class members and the court has not yet completed its class certification  
4 process. No class representative has yet been approved by the court.  
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6 **OBJECTION TO REQUEST NO. 45:**

7       Objection. The request is premature, burdensome and oppressive. This request seeks  
8 information concerning class members and the court has not yet completed its class certification  
9 process. No class representative has yet been approved by the court.  
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11 **OBJECTION TO REQUEST NO. 46:**

12       Objection. The request is premature, burdensome and oppressive. This request seeks  
13 information concerning class members and the court has not yet completed its class certification  
14 process. No class representative has yet been approved by the court.  
15

16 **OBJECTION TO REQUEST NO. 47:**

17       Objection. The request is premature, burdensome and oppressive. This request seeks  
18 information concerning class members and the court has not yet completed its class certification  
19 process. No class representative has yet been approved by the court.  
20

21 **OBJECTION TO REQUEST NO. 48:**

22       Objection. The request is premature, burdensome and oppressive. This request seeks  
23 information concerning class members and the court has not yet completed its class certification  
24 process. No class representative has yet been approved by the court.  
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1 **OBJECTION TO REQUEST NO. 49:**

2       Objection. The request is premature, burdensome and oppressive. This request seeks  
3 information concerning class members and the court has not yet completed its class certification  
4 process. No class representative has yet been approved by the court.  
5

6 **OBJECTION TO REQUEST NO. 50:**

7       Objection. The request is premature, burdensome and oppressive. This request seeks  
8 information concerning class members and the court has not yet completed its class certification  
9 process. No class representative has yet been approved by the court.  
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11 **OBJECTION TO REQUEST NO. 51:**

12       Objection. The request is premature, burdensome and oppressive. This request seeks  
13 information concerning class members and the court has not yet completed its class certification  
14 process. No class representative has yet been approved by the court.  
15

16 **OBJECTION TO REQUEST NO. 52:**

17       Objection. The request is premature, burdensome and oppressive. This request seeks  
18 information concerning class members and the court has not yet completed its class certification  
19 process. No class representative has yet been approved by the court.  
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21 **OBJECTION TO REQUEST NO. 53:**

22       Objection. The request is premature, burdensome and oppressive. This request seeks  
23 information concerning class members and the court has not yet completed its class certification  
24 process. No class representative has yet been approved by the court.  
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1 **OBJECTION TO REQUEST NO. 54:**

2       Objection. The request is premature, burdensome and oppressive. This request seeks  
3 information concerning class members and the court has not yet completed its class certification  
4 process. No class representative has yet been approved by the court.

5  
6 **OBJECTION TO REQUEST NO. 55:**

7       Objection. The request is premature, burdensome and oppressive. This request seeks  
8 information concerning class members and the court has not yet completed its class certification  
9 process. No class representative has yet been approved by the court.

10  
11 **OBJECTION TO REQUEST NO. 56:**

12       Objection. The request is premature, burdensome and oppressive. This request seeks  
13 information concerning class members and the court has not yet completed its class certification  
14 process. No class representative has yet been approved by the court.

15  
16 **OBJECTION TO REQUEST NO. 57:**

17       Objection. The request is premature, burdensome and oppressive. This request seeks  
18 information concerning class members and the court has not yet completed its class certification  
19 process. No class representative has yet been approved by the court.

20  
21 **OBJECTION TO REQUEST NO. 58:**

22       Objection. The request is premature, burdensome and oppressive. This request seeks  
23 information concerning class members and the court has not yet completed its class certification  
24 process. No class representative has yet been approved by the court.

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1 **OBJECTION TO REQUEST NO. 59:**

2       Objection. The request is premature, burdensome and oppressive. This request seeks  
3 information concerning class members and the court has not yet completed its class certification  
4 process. No class representative has yet been approved by the court.  
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6 **OBJECTION TO REQUEST NO. 60:**

7       Objection. The request is premature, burdensome and oppressive. This request seeks  
8 information concerning class members and the court has not yet completed its class certification  
9 process. No class representative has yet been approved by the court.  
10

11 DATED: June 26, 2007

STRADLING YOCCA CARLSON & RAUTH  
A Professional Corporation

12  
13 By:

  
\_\_\_\_\_  
Douglas J. Evertz, Attorneys for Defendant/  
Cross-Complainant and Cross-Defendant  
CITY OF LANCASTER

**PROOF OF SERVICE**

I am a resident of the State of California and over the age of eighteen years, and not a party to the within action; my business address is 660 Newport Center Drive, Suite 1600, Newport Beach, California 92660. On June 26, 2007, I served the within document(s):

**CITY OF LANCASTER'S OBJECTIONS TO DIAMOND FARMING  
COMPANY'S REQUEST FOR ADMISSIONS, SET ONE**



by posting the document(s) list above to the website <http://www.scefiling.org>, a dedicated link to the Antelope Valley Groundwater Cases; Santa Clara Case No. 1-05-CV 049053, Assigned to The Honorable Jack Komar.



by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m.



by placing the document(s) listed above in a sealed envelope, fully prepaid, via United States Mail addressed as set forth below.



by placing the document(s) listed above in a sealed FEDERAL EXPRESS package for overnight delivery at Newport Beach, California addressed as set forth below.

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

Executed on June 26, 2007, at Newport Beach, California.

  
LORIN MORENO