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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
RESPONSE TO DIAMOND
FARMING COMPANY'S FORM
INTERROGATORIES, SET ONE**

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 Form Interrogatories, Set One to the extent they intrude
9 into 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 **RESPONSES TO FORM INTERROGATORIES**

13
14 **RESPONSE TO FORM INTERROGATORY NO. 1.1:**

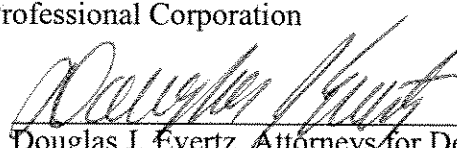
15 All responses to requests for admissions are objections by legal counsel.
16

17 **RESPONSE TO FORM INTERROGATORY NO. 17.1:**

18 All responses to requests for admissions are objections by legal counsel.
19

20 DATED: June 26, 2007

21 STRADLING Yocca CARLSON & RAUTH
22 A Professional Corporation

23 By: 
24 Douglas J. Evertz, Attorneys for Defendant/
25 Cross-Complainant and Cross-Defendant
26 CITY OF LANCASTER
27
28

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 RESPONSE TO DIAMOND FARMING
COMPANY'S FORM INTERROGATORIES, 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