

DOUGLAS J. EVERTZ, State Bar No. 123066  
STRADLING YOCCA CARLSON & RAUTH  
A Professional Corporation  
660 Newport Center Drive, Suite 1600  
Newport Beach, California 92660-6441  
Telephone: (949) 725-4000  
Fax: (949) 725-4100

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  
SPECIAL 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 special 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 interrogatory served on the City.

12 **RESPONSE TO SPECIAL INTERROGATORIES**

13  
14 **RESPONSE TO SPECIAL INTERROGATORY NO. 1:**

15  
16 Objection. The interrogatory is premature, burdensome and oppressive. This  
17 interrogatory seeks information concerning class members and the court has not yet completed  
18 its class certification process. No class representative has yet been approved by the court.

19 **RESPONSE TO SPECIAL INTERROGATORY NO. 2:**

20  
21 Objection. The interrogatory is premature, burdensome and oppressive. This  
22 interrogatory seeks information concerning class members and the court has not yet completed  
23 its class certification process. No class representative has yet been approved by the court.

24 **RESPONSE TO SPECIAL INTERROGATORY NO. 3:**

25  
26 Objection. The interrogatory is premature, burdensome and oppressive. This  
27 interrogatory seeks information concerning class members and the court has not yet completed  
28 its class certification process. No class representative has yet been approved by the court.

1 **RESPONSE TO SPECIAL INTERROGATORY NO. 4:**

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

6 **RESPONSE TO SPECIAL INTERROGATORY NO. 5:**

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

11 **RESPONSE TO SPECIAL INTERROGATORY NO. 6:**

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

16 **RESPONSE TO SPECIAL INTERROGATORY NO. 7:**

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

21 **RESPONSE TO SPECIAL INTERROGATORY NO. 8:**

22       Objection. The interrogatory is premature, burdensome and oppressive. This  
23 interrogatory seeks information concerning class members and the court has not yet completed  
24 its class certification process. No class representative has yet been approved by the court.  
25

26 ///

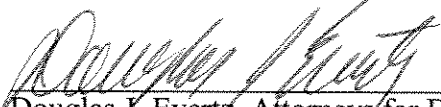
27 ///

1 **RESPONSE TO SPECIAL INTERROGATORY NO. 9:**

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

5 DATED: June 26, 2007

6 STRADLING YOCCA CARLSON & RAUTH  
A Professional Corporation

7  
8 By:   
9 Douglas J. Evertz, Attorneys for Defendant/  
Cross-Complainant and Cross-Defendant  
CITY OF LANCASTER

1 **PROOF OF SERVICE**

2 I am a resident of the State of California and over the age of eighteen years, and not a  
3 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):

4 **CITY OF LANCASTER'S OBJECTIONS TO DIAMOND FARMING**  
5 **COMPANY'S SPECIAL 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.

10  
11  
12  
13  
14 I declare under penalty of perjury under the laws of the State of California that the above  
is true and correct.

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

16  
17   
18 LORIN MORENO  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28