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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 PRODUCTION
OF DOCUMENTS, SET ONE**

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1 **PROPOUNDING PARTY:** DIAMOND FARMING COMPANY
2 **RESPONDING PARTY:** CITY OF LANCASTER ("CITY")
3 **SET NO.:** ONE
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6 **GENERAL OBJECTIONS**
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8 A. The City objects to this first set of demand for inspection of documents and
9 things to the extent they intrude into confidential communications covered by the attorney-client
10 privilege and they intrude into confidential material covered by the attorney work-product
11 privilege. This objection applies equally to each and every request served on the City.

12 **OBJECTIONS TO REQUEST FOR PRODUCTION**
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14 **OBJECTION TO REQUEST NO. 1:**
15

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

19 **OBJECTION TO REQUEST NO. 2:**
20

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

24 **OBJECTION TO REQUEST NO. 3:**
25

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

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.
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16 DATED: June 26, 2007

STRADLING YOCCA CARLSON & RAUTH
A Professional Corporation

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19 By: 

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