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James W. Lewis (SBN 207599)

TAYLOR & RING

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Attorneys for Cross-defendants,

LITTLE ROCK SAND AND GRAVEL, INC.,

a California Corporation;

THE GEORGE AND CHARLENE LANE FAMILY TRUST;

THE FRANK AND YVONNE LANE 1993 FAMILY

TRUST, DATED MARCH 5, 1993, AS RESTATED

JULY 20, 2000; MONTE VISTA BUILDING SITES, INC.,

a California Corporation; A.V. MATERIALS, INC.,

a California Corporation;

HOLLIDAY ROCK CO., INC.,

successor in interest to

LITTLEROCK AGGREGATE CO., INC. dba

ANTELOPE VALLEY AGGREGATE, INC.;

LITTLEROCK AGGREGATE CO., INC. dba

ANTELOPE VALLEY AGGREGATE, INC.

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

ANTELOPE VALLEY GROUNDWATER CASES

Judicial Council Coordination No.
4408

Included Actions:

For filing purposes only:
Santa Clara County Case No.
1-05-CV-049053

Los Angeles County Waterworks

District No. 40 v. Diamond

Farming Co. Superior Court of

California County of Los Angeles,

Case No. BC 325 201

[Assigned to the Honorable Jack
Komar]

Los Angeles County Waterworks 2

District No. 40 v. Diamong

Farming Co. Superior court of

Califronia, County of Kern, Case

No. S-1500-CV-254-348

**NOTICE TO ANTELOPE VALLEY EAST
KERN WATER AGENCY'S CUSTODIAN OF
RECORDS TO APPEAR AND PRODUCE
DOCUMENTS AT TRIAL**

Date: February 10, 2014

Time: 9:00 a.m.

Place: 111 N. Hill Street

Los Angeles, CA

Dept.: Old Dept. 1

Wm. Bolthouse Farms, Inc. V. City

1 of Lancaster Diamong Farming Co.)
V. City of Lancaster Diamond)
2 Farming Co. V. Palmdale Water)
Dist. Superior Court of)
3 California, County of Riverside,)
consolidated actions, Case No.)
4 RIC 353 840, RIC 344 436, RIC 344)
668)

5
6 PLEASE TAKE NOTICE that PURSUANT TO Code of Civil Procedure
7 section 1987(b) and (c) these cross-defendants request that
8 ANTELOPE VALLEY EAST KERN WATER AGENCY's ("AVEK") designated
9 Custodian of Records appear at the trial in the above-captioned
10 matter on February 10, 2014 at 9:00 a.m. in (old) Department "1"
11 of the Los Angeles Superior Court, located at 111 North Hill
12 Street, Los Angeles, California, or such other location as may
13 be ordered by the court, to testify as witnesses in this case.

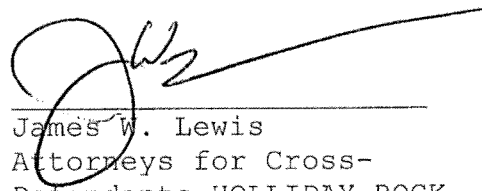
14 PLEASE TAKE FURTHER NOTICE THAT pursuant to Code of Civil
15 Procedure section 1987(c) these cross-defendants request that
16 its Custodian of Records produce the original documents listed
17 in the attached Exhibit A, which AVEK has in their possession or
18 under their control.

19 These requests are made pursuant to section 1987(b) and (c)
20 of the Code of Civil Procedure, which provide that the giving of
21 this notice has the same effect as the service of a subpoena and
22 that, in the event of noncompliance with this notice, the
23 parties shall have such rights, and the court may make such
24 orders, including the imposition of sanctions, as in the case of

1 a subpoena for attendance before the court.

2 Dated: January 17, 2014

TAYLOR & RING

3
4 By: 

James W. Lewis
Attorneys for Cross-
Defendants HOLLIDAY ROCK
CO., INC., successor in
interest to LITTLEROCK
AGGREGATE CO., INC. dba
ANTELOPE VALLEY
AGGREGATE, INC.; THE
FRANK AND YVONNE LANE
1993 FAMILY TRUST, DATED
MARCH 5, 1993, AS
RESTATED JULY 20, 2000,
successor in interest to
FRANK A. LANE, ROE 612;
THE GEORGE AND CHARLENE
LANE FAMILY TRUST,
Successor in interest to
George M. Lane, Roe 316;
MONTE VISTA BUILDING
SITES, INC., a
California Corporation;
A.V. MATERIALS, INC., a
California Corporation,
ROE 9; A.C. WARNACK,
as Trustee of the A.C.
WARNACK TRUST; LITTLE
ROCK SAND AND GRAVEL,
INC.

EXHIBIT A

I. DEFINITIONS

The following words and phrases shall govern the construction of this document unless the context otherwise requires:

1. "DOCUMENTS" means "writing" as defined by Evidence Code section 250 and includes drafts, originals and duplicates of written, graphic, computer or otherwise recorded matters, whether stored in written, electronic, magnetic or photographic format or by any other means.

2. "AVEK" shall mean ANTELOPE VALLEY EAST KERN WATER AGENCY, any of their agents, representatives, officers or employees.

II. DOCUMENTS TO BE PRODUCED

1. The DOCUMENTS prepared by AVEK, including sales ledgers, or other similar documents, showing the quantities of water purchased from AVEK by George Lane, the George and Charlene Lane Family Trust, Frank Lane, the Frank and Yvonne Lane Family Trust, and/or Yvonne Lane between 1962 and the present date at real property located at 60th Street West and Avenue L in Lancaster, California.

2. The DOCUMENTS prepared by AVEK, including sales ledgers, or other similar documents, showing the quantities of water purchased from AVEK by George Lane, the George and

1 Charlene Lane Family Trust, Frank Lane, the Frank and Yvonne
2 Lane Family Trust, and Yvonne Lane between 1962 and the present
3 at real property located at or near 70th Street West and Avenue N
4 in Palmdale, California 93551.

1 PROOF OF SERVICE
2 (C.C.P. 1013A, 2015.5)

3 STATE OF CALIFORNIA

4 I am employed in the County of Los Angeles, State of California.
5 I am over the age of eighteen years and not a party to the within
6 action; my business address is 10900 Wilshire Boulevard, Suite 920,
7 Los Angeles, California 90024.

8 On January 17, 2014, I served the foregoing document, described
9 as:

10 NOTICE TO ANTELOPE VALLEY EAST KERN WATER AGENCY'S CUSTODIAN OF
11 RECORDS TO APPEAR AND PRODUCE DOCUMENTS AT TRIAL

12 on the interested parties in this action in the following manner:

13 X BY ELECTRONIC SERVICE AS FOLLOWS by posting the document(s)
14 listed above to the Santa Clara website in the action of the Antelope
15 Valley Groundwater Litigation, Judicial Council Coordination
16 Proceeding No. 4408, Santa Clara Case No. 1-05-CV-049053.

17 Executed on January 17, 2014 at Los Angeles, California.

18 XX (State) I declare under penalty of perjury under the laws of
19 the State of California that the above is true and correct.

20 James W. Lewis
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