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14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
15 **COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

16 **ANTELOPE VALLEY GROUNDWATER**
17 **CASES**

18 **INCLUDED ACTIONS:**

19 Los Angeles County Waterworks District No.
20 40 v. Diamond Farming Co., Superior Court of
21 California, County of Los Angeles, Case No.
22 BC325201;

23 Los Angeles County Waterworks District No.
24 40 v. Diamond Farming Co., Superior Court of
25 California, County of Kern, Case No. S-1500-
26 CV-254348;

27 Wm. Bolthouse Farms, Inc. v. City of
28 Lancaster, Diamond Farming Co. v. Lancaster,
Diamond Farming Co. v. Palmdale Water
Dist., Superior Court of California, County of
Riverside, Case Nos. RIC 353840, RIC
344436, RIC 344668;

Rebecca Lee Willis v. Los Angeles County
Waterworks District No. 40
Superior Court of California, County of Los
Angeles, Case No. BC364553;

Wood v. A.V. Materials, Inc., et al. v. Superior
Court of California, County of Los Angeles,
Case No. BC 509546; and

Little Rock Sand and Gravel, Inc. v. Granite
Construction Co., Superior Court of
California, County of Los Angeles, Case No.
MC026932

Judicial Counsel Coordination No. 4408

Santa Clara Case No. 1-05-CV-049053

Assigned to Honorable Jack Komar

REQUESTS FOR PRODUCTION OF
DOCUMENTS, SET TWO,
PROPOUNDED TO GRANITE
CONSTRUCTION COMPANY

1 PROPOUNDING PARTY: LITTLE ROCK SAND AND GRAVEL, INC., a California
2 Corporation

3 RESPONDING PARTY: GRANITE CONSTRUCTION COMPANY, a California
4 Corporation

5 SET NO.: TWO

6 LITTLE ROCK SAND AND GRAVEL, INC., a California Corporation, hereby requests that,
7 pursuant to California *Code of Civil Procedure* § 2031.010 et seq., GRANITE CONSTRUCTION
8 COMPANY, a California Corporation ("Responding Party"), respond under oath and in writing to the
9 following Requests for Production of Documents within thirty (30) days after the service hereof and
10 identify and produce within thirty (30) days after the service hereof the original documents and/or
11 other tangible items requested herein or, if the originals are not available, copies for inspection and
12 photocopying at the offices of Musick, Peeler & Garrett, LLP at 650 Town Center Drive, Suite 1200,
13 Costa Mesa, California 92626-1925.

14 This Request seeks documents and/or other tangible items that are believed to be in
15 Responding Party's possession, custody and/or control or in the possession, custody and/or control of
16 Responding Party's representatives or agents, including Responding Party's attorneys of record
17 herein. If any such documents and/or other tangible items were, but are no longer, in Responding
18 Party's possession, custody and/or control, Responding Party must state the name, address, and
19 telephone number of the present custodian of each document or thing or state whatever disposition
20 was made of each document or thing. Each document or thing produced by Responding Party shall be
21 produced in its original folder or other container with all file labels intact.

22 **INSTRUCTIONS**

23 With respect to the requests for documents listed below, the following instructions apply:

24 1. Responding Party is required to identify and produce all those documents in
25 Responding Party's possession, custody and/or control and those documents in the possession,
26 custody and/or control of Responding Party's representatives, agents, attorneys, investigators,
27 accountants and persons and/or entities acting together, for, or on Responding Party's behalf.

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2. If any requested document is known to have existed, but no longer exists or is no longer in the possession, custody or control of Responding Party, Responding Party shall identify the name, address and telephone number of its last known custodian and state the date upon which it was lost, destroyed or became unavailable. If the document still exists, Responding Party shall identify its present custodian and location.

3. Whenever appropriate, the singular form of the word "shall" be interpreted in the plural and, similarly, the plural form shall be interpreted in the singular.

4. If the Responding Party claims privilege as a ground for refusing to produce any document or other tangible thing, describe the factual basis for such claim of privilege and sufficient detail to permit adjudication of validity of that claim, including but not limited to the following:

- a. a brief description of the type of the document or other tangible things;
- b. the date of the document;
- c. the name, title and job description of the author of the document or other tangible things;
- d. the name, title and job description of the addressee(s) and recipient(s) of the document or other tangible things;
- e. the name, title and job description of all other persons who received the document or other tangible things;
- f. a brief description of the subject matter of the document or other tangible things; and
- g. the nature of the privileged claim with respect to each document or other tangible things.

Such identification must be sufficient to enable the document or other tangible thing to be identified in a subpoena duces tecum or in any subsequent motion that may be brought to compel its production and/or challenge the assertion of any such privilege or protection.

DEFINITIONS

1. "YOU" and "YOUR" shall refer to Granite Construction Company, a California corporation, and all others acting on or for its behalf.

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2. "WELL 1" shall refer to the groundwater well located on the parcel of land that YOU lease from Little Rock Sand and Gravel, Inc., with Assessor's Parcel Number 3050-010-006, and as shown by the numeral "1" written on the map attached as Exhibit 4 to the transcript of the November 21, 2017 deposition of LITTLE ROCK's person most qualified to testify, a true and correct copy of which is attached hereto as Exhibit "A".

3. "WELL 2" shall refer to the groundwater well located near the northwest corner of the parcel of land that YOU lease from Little Rock Sand and Gravel, Inc., with Assessor's Parcel Number 3050-028-015, and as shown by the numeral "2" written on the map attached as Exhibit 4 to the transcript of the November 21, 2017 deposition of LITTLE ROCK's person most qualified to testify, a true and correct copy of which is attached hereto as Exhibit "A".

4. "WELL 3" shall refer to the groundwater well located near the southern boundary of the parcel of land that YOU lease from Little Rock Sand and Gravel, Inc., with Assessor's Parcel Number 3050-028-015, and as shown by the numeral "3" written on the map attached as Exhibit 4 to the transcript of the November 21, 2017 deposition of LITTLE ROCK's person most qualified to testify, a true and correct copy of which is attached hereto as Exhibit "A".

5. "WELL 4" shall refer to the groundwater well located on the parcel of land that YOU lease from Little Rock Sand and Gravel, Inc., with Assessor's Parcel Number 3050-022-010, and as shown by the numeral "4" written on the map attached as Exhibit 4 to the transcript of the November 21, 2017 deposition of LITTLE ROCK's person most qualified to testify, a true and correct copy of which is attached hereto as Exhibit "A".

6. "ADJACENT LAND" shall refer to the parcels of land that YOU own and that are located immediately south of the land that YOU lease from LITTLE ROCK and which are shown by the letter "G" written on the map attached as Exhibit 4 to the transcript of the November 21, 2017 deposition of LITTLE ROCK's person most qualified to testify, a true and correct copy of which is attached hereto as Exhibit "A".

7. "DOCUMENT" or "DOCUMENTS" shall mean a "writing," as defined in California *Evidence Code* section 250; shall include, but not be limited to, each and every form in which information is kept, produced, reproduced or stored; shall also include, but not be limited to, letters,

1 reports, agreements, correspondence, intra-office or inter-office correspondence, telegrams, minutes or
2 records of meetings, reports or summaries of investigations, expressions or statements of policy,
3 opinions or reports of consultants, lists, drafts, revisions, invoices, receipts, original and preliminary
4 notes, preliminary sketches, records, ledgers, contracts, bills of lading, bills, inventories, financial
5 data, maps, memoranda, accounting and financial records, diaries, journals, calendars, statements,
6 work papers, videotapes, audiotapes, photographs, pamphlets, brochures, advertisements, trade letters,
7 press releases, drawings, recaps, tables, articles, summaries of conversations, electronic mail
8 messages, computer cards, tapes, disks, and any other means of electronically or magnetically
9 maintained information, and printouts; and shall also include, without limitation, all originals and non-
10 identical copies.

11 8. "RELATE TO" and "RELATES TO" shall mean disclose, discuss, support, evidence,
12 constitute, identify, indicate, involve, reference or reflect the subject matter referred to.

13
14 **REQUEST FOR PRODUCTION OF DOCUMENTS**

15 Demand is hereby made for production of the following:

16 **REQUEST FOR PRODUCTION NO. 20:**

17 All DOCUMENTS that RELATE TO the amount of groundwater that YOU extracted from
18 WELL 1 in any year from 1987 to the present.

19 **REQUEST FOR PRODUCTION NO. 21:**

20 All DOCUMENTS that RELATE TO the amount of groundwater that YOU extracted from
21 WELL 2 in any year from 1987 to the present.

22 **REQUEST FOR PRODUCTION NO. 22:**

23 All DOCUMENTS that RELATE TO the amount of groundwater that YOU extracted from
24 WELL 3 in any year from 1987 to the present.

25 **REQUEST FOR PRODUCTION NO. 23:**

26 All DOCUMENTS that RELATE TO the amount of groundwater that YOU extracted from
27 WELL 4 in any year from 1987 to the present.

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1 **REQUEST FOR PRODUCTION NO. 24:**

2 All DOCUMENTS that RELATE TO the amount of groundwater that YOU extracted from
3 any source, well or otherwise, located on the ADJACENT LAND from the time that YOU first
4 owned the ADJACENT LAND to the present.

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6 DATED: December 12, 2017

MUSICK, PEELER & GARRETT LLP

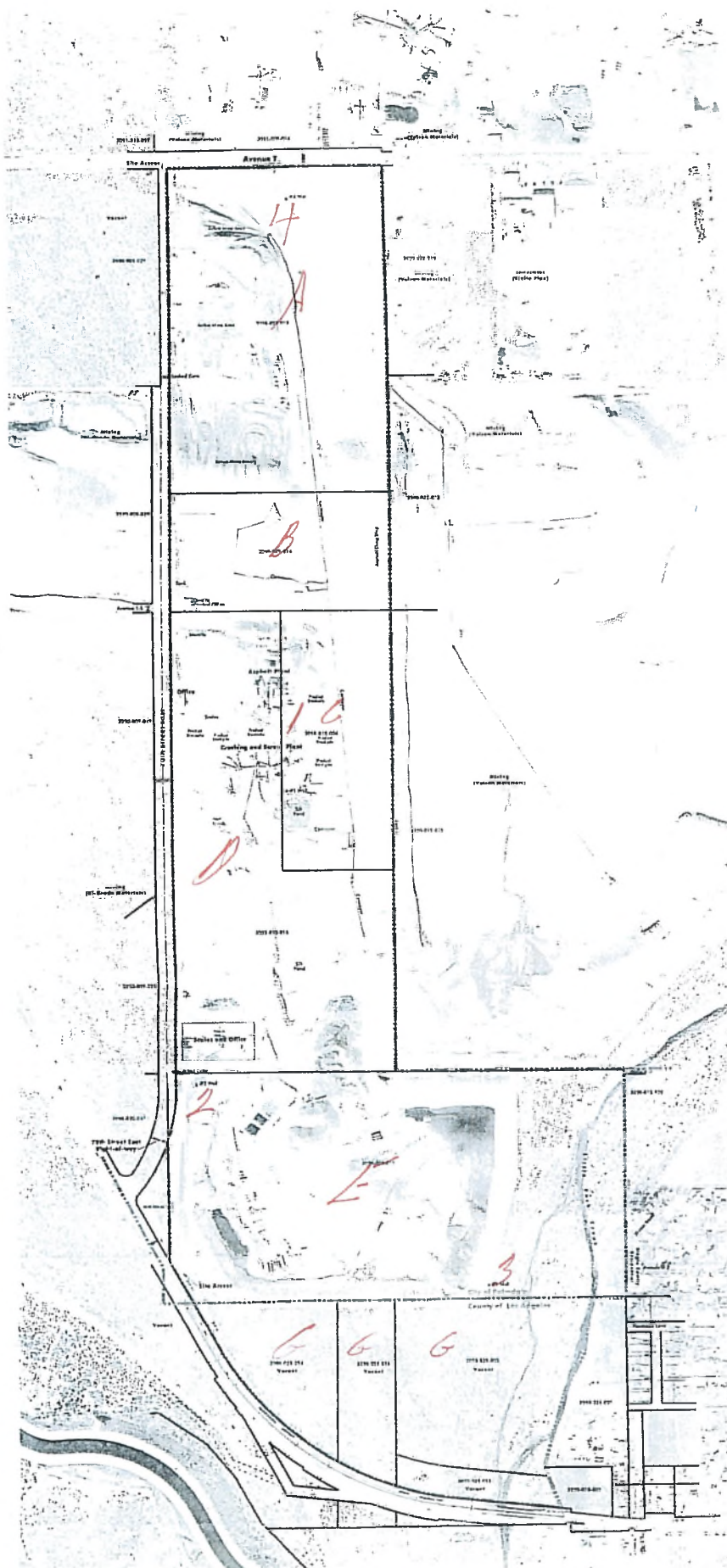
7
8 By: 

9 Theodore A. Chester, Jr.

10 Stephen R. Isbell

11 Attorneys for LITTLE ROCK SAND AND
12 GRAVEL, INC.
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EXHIBIT “A”



PLF/DEF Line
 EXHIBIT 4
 DATE 11.21.17
 Vanessa Zaragoza, CSR 13924



Project Boundary
 Farm Line
 Drainage Course
 Dirt Road
 Power Pole
 Building and Conveyors

Aerial - Existing Mine Conditions

Granite Construction Inc., - Little Rock Quarry
 City of Palmdale, California

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At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Orange, State of California. My business address is Musick Peeler & Garrett LLP, 650 Town Center Drive, Suite 1200, Costa Mesa, CA 92626-1925.

The file transmission was reported as complete to all parties appearing on the <http://www.avwatermaster.org> electronic service list and (www.Twolegal.com) for the Antelope Valley Groundwater Cases, Case No. 2005-1-CV-049053; JCCP 4408.

17 Attorneys for Granite Construction Company:
18 Robert G. Kuhs
19 Bernard C. Barmann, Jr.
20 Kuhs & Parker
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P.O. Box 2205
Bakersfield, CA 93303

Executed on December 12, 2017, at Costa Mesa, California.