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7 Attorneys for LITTLE ROCK SAND AND GRAVEL, INC.

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

10 **ANTELOPE VALLEY GROUNDWATER**  
11 **CASES**

12 **INCLUDED ACTIONS:**

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

14 Los Angeles County Waterworks District No.  
15 40 v. Diamond Farming Co., Superior Court of  
California, County of Kern, Case No. S-1500-  
16 CV-254348;

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

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

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

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

Judicial Counsel Coordination No. 4408

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

Assigned to Honorable Jack Komar

**REQUESTS FOR ADMISSION, SET ONE,**  
**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.: ONE

6 TO GRANITE CONSTRUCTION COMPANY AND ITS ATTORNEYS OF RECORD:  
7 LITTLE ROCK SAND AND GRAVEL, INC., hereby requests that, pursuant to California  
8 *Code of Civil Procedure* §2033.010 et seq., GRANITE CONSTRUCTION COMPANY (“Responding  
9 Party”) respond under oath and in writing to the following Requests for Admission, Set One. Each  
10 request is addressed to the personal knowledge of the Responding Party and to the knowledge and  
11 information of his attorneys, investigators, employees, directors, officers, shareholders, agents,  
12 representatives and all parties acting on or for his behalf.

13  
14 **DEFINITIONS**

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

17 2. “WELL 1” shall refer to the groundwater well located on the parcel of land that YOU  
18 lease from Little Rock Sand and Gravel, Inc., with Assessor’s Parcel Number 3050-010-006, and as  
19 shown by the numeral “1” written on the map attached as Exhibit 4 to the transcript of the November  
20 21, 2017 deposition of LITTLE ROCK’s person most qualified to testify, a true and correct copy of  
21 which is attached hereto as Exhibit “A”.

22 3. “WELL 2” shall refer to the groundwater well located near the northwest corner of the  
23 parcel of land that YOU lease from Little Rock Sand and Gravel, Inc., with Assessor’s Parcel Number  
24 3050-028-015, and as shown by the numeral “2” written on the map attached as Exhibit 4 to the  
25 transcript of the November 21, 2017 deposition of LITTLE ROCK’s person most qualified to testify, a  
26 true and correct copy of which is attached hereto as Exhibit “A”.

27 4. “WELL 3” shall refer to the groundwater well located near the southern boundary of  
28 the parcel of land that YOU lease from Little Rock Sand and Gravel, Inc., with Assessor’s Parcel

1 Number 3050-028-015, and as shown by the numeral “3” written on the map attached as Exhibit 4 to  
2 the transcript of the November 21, 2017 deposition of LITTLE ROCK’s person most qualified to  
3 testify, a true and correct copy of which is attached hereto as Exhibit “A”.

4 5. “WELL 4” shall refer to the groundwater well located on the parcel of land that YOU  
5 lease from Little Rock Sand and Gravel, Inc., with Assessor’s Parcel Number 3050-022-010, and as  
6 shown by the numeral “4” written on the map attached as Exhibit 4 to the transcript of the November  
7 21, 2017 deposition of LITTLE ROCK’s person most qualified to testify, a true and correct copy of  
8 which is attached hereto as Exhibit “A”.

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

14  
15 **REQUESTS FOR ADMISSION**

16 Please admit that:

17 **REQUEST FOR ADMISSION NO. 1.:**

18 YOU have never extracted any groundwater from any source, well or otherwise, located on  
19 the ADJACENT LAND.

20 **REQUEST FOR ADMISSION NO. 2.:**

21 From 1987 to the present, YOU have extracted more groundwater from WELL 1 than  
22 WELL 2.

23 **REQUEST FOR ADMISSION NO. 3.:**

24 From 1987 to the present, YOU have extracted more groundwater from WELL 1 than  
25 WELL 3.

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1 **REQUEST FOR ADMISSION NO. 4.:**

2 From 1987 to the present, YOU have extracted more groundwater from WELL 1 than  
3 WELL 4.

4  
5 DATED: December 12, 2017

MUSICK, PEELER & GARRETT LLP

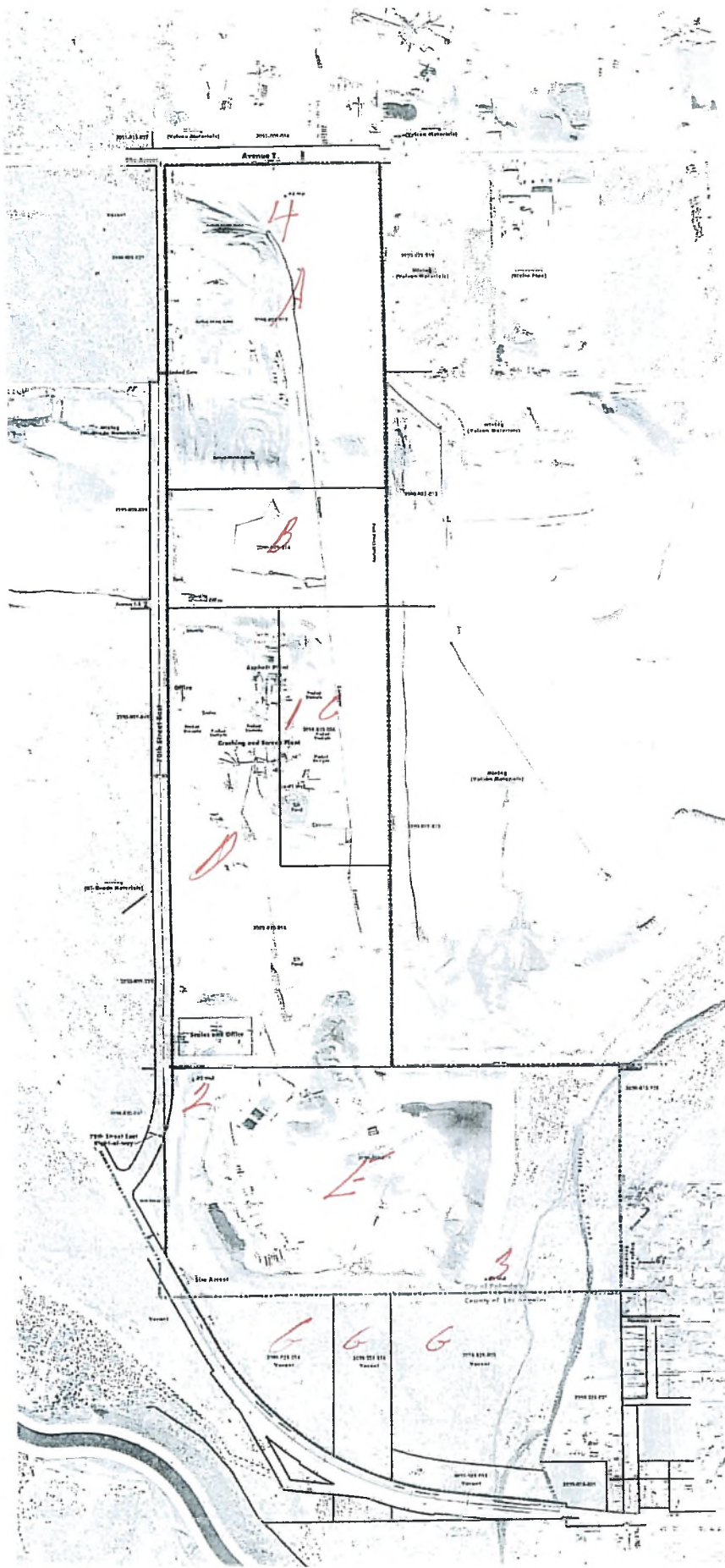
6  
7 By: 

8 Theodore A. Chester, Jr.

9 Stephen R. Isbell

10 Attorneys for LITTLE ROCK SAND AND  
11 GRAVEL, INC.  
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## **EXHIBIT “A”**



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

323  
 Scale  
 North Arrow  
 12 2015  
**ALBURN**  
 CONSULTING

Project Boundary  
 Parcel 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](http://www.Twolegal.com)) for the Antelope Valley Groundwater Cases, Case No. 2005-1-CV-049053; JCCP 4408.

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

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