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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

**SPECIAL INTERROGATORIES, 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 In accordance with California *Code of Civil Procedure* ("C.C.P.") section 2030.210, et  
8 seq., you are required to provide responses under oath to each interrogatory by written answer  
9 containing the information sought to be discovered, or you may exercise your option to produce  
10 writings in lieu of a written answer. Each answer shall be as complete and straightforward as the  
11 information reasonably available to you permits. If an interrogatory cannot be answered  
12 completely, it shall be answered to the extent possible. If you do not have personal knowledge  
13 sufficient to respond fully to an interrogatory, you have an obligation to make a reasonable and  
14 good faith effort to obtain the information by inquiry to other persons or organizations unless that  
15 information is equally available to the Propounding Party. If only a part of the interrogatory is  
16 objectionable, the remainder of the interrogatory shall be answered. If an objection is made to an  
17 interrogatory or to part of an interrogatory, the specific ground for the objection shall be set forth  
18 clearly in the response. If an objection is based on the claim of privilege, the particular privilege  
19 invoked shall be clearly stated. If an objection is based on the claim that the information sought is  
20 protected work product under C.C.P. § 2018, each claim shall be expressly asserted. Your written  
21 response signed under oath is due thirty (30) days from the date of service of these interrogatories.

22  
23 **DEFINITIONS**

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

26 2. "LITTLE ROCK" shall refer to Little Rock Sand and Gravel, Inc., and all others acting  
27 on or for its behalf.

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

6           4.       “WELL 2” shall refer to the groundwater well located near the northwest corner of the  
7 parcel of land that YOU lease from Little Rock Sand and Gravel, Inc., with Assessor’s Parcel Number  
8 3050-028-015, and as shown by the numeral “2” written on the map attached as Exhibit 4 to the  
9 transcript of the November 21, 2017 deposition of LITTLE ROCK’s person most qualified to testify, a  
10 true and correct copy of which is attached hereto as Exhibit “A”.

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

16          6.       “WELL 4” shall refer to the groundwater well located on the parcel of land that YOU  
17 lease from Little Rock Sand and Gravel, Inc., with Assessor’s Parcel Number 3050-022-010, and as  
18 shown by the numeral “4” written on the map attached as Exhibit 4 to the transcript of the November  
19 21, 2017 deposition of LITTLE ROCK’s person most qualified to testify, a true and correct copy of  
20 which is attached hereto as Exhibit “A”.

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

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**SPECIAL INTERROGATORIES, SET ONE**

Demand is hereby made for production of the following:

**SPECIAL INTERROGATORY NO. 1.:**

State the residential address of William Taylor sufficiently to enable LITTLE ROCK to determine where to notice his deposition.

**SPECIAL INTERROGATORY NO. 2.:**

State the residential address of Richard Zimmer sufficiently to enable LITTLE ROCK to determine where to notice his deposition.

**SPECIAL INTERROGATORY NO. 3.:**

State the residential address of Joseph D. Hughes sufficiently to enable LITTLE ROCK to determine where to notice his deposition.

**SPECIAL INTERROGATORY NO. 4.:**

State the residential address of Bob Joyce sufficiently that LITTLE ROCK sufficiently to enable LITTLE ROCK to determine where to notice his deposition.

**SPECIAL INTERROGATORY NO. 5.:**

State the residential address of Mike McLachlan sufficiently to enable LITTLE ROCK to determine where to notice his deposition.

**SPECIAL INTERROGATORY NO. 6.:**

State the residential address of Michael D. Davis sufficiently to enable LITTLE ROCK to determine where to notice his deposition.

**SPECIAL INTERROGATORY NO. 7.:**

State the amount of groundwater that YOU pumped from WELL 1 for each year from 1987 through 2017.

**SPECIAL INTERROGATORY NO. 8.:**

State the amount of groundwater that YOU pumped from WELL 2 for each year from 1987 through 2017.

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

2 State the amount of groundwater that YOU pumped from WELL 3 for each year from  
3 1987 through 2017.

4 **SPECIAL INTERROGATORY NO. 10.:**

5 State the amount of groundwater that YOU pumped from WELL 4 for each year from  
6 1987 through 2017.

7 **SPECIAL INTERROGATORY NO. 11.:**

8 State the amount of groundwater that YOU pumped from any groundwater well located on  
9 the ADJACENT LAND for each year that YOU have owned the ADJACENT LAND.

10  
11 DATED: December 12, 2017

MUSICK, PEELER & GARRETT LLP

12  
13 By:



14 Theodore A. Chester, Jr.

15 Stephen R. Isbell

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



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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.

Attorneys for Granite Construction Company:  
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P.O. Box 2205  
Bakersfield, CA 93303

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

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