1	MUSICK, PEELER & GARRETT LLP ATTORNEYS AT LAW				
2	ONE WILSHIRE BOULEVARD, SUITE 2000 LOS ANGELES, CALIFORNIA 90017-3383 TELEHANE (213) 629-1600 EACIMMER (213) 624-1376				
3	Theodore A. Chester, Jr. (State Bar No. 105405)				
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5	s.casselberry@mpglaw.com Stephen R. Isbell (State Bar No. 247151)				
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7	Attorneys for LITTLE ROCK SAND AND GRAVEL, INC.				
8	SUPERIOR COURT OF THE STATE OF CALIFORNIA COUNTY OF LOS ANGELES, CENTRAL DISTRICT				
10	ANTELOPE VALLEY GROUNDWATER	Judicial Counsel Coordination No. 4408			
11	CASES	Santa Clara Case No. 1-05-CV-049053			
12	INCLUDED ACTIONS: Los Angeles County Waterworks District No.	Assigned to Honorable Jack Komar			
12	40 v. Diamond Farming Co., Superior Court of California, County of Los Angeles, Case No.	SPECIAL INTERROGATORIES, SET			
14	BC325201;	ONE, PROPOUNDED TO GRANITE			
15	Los Angeles County Waterworks District No. 40 v. Diamond Farming Co., Superior Court of	CONSTRUCTION COMPANY			
16	California, County of Kern, Case No. S-1500- CV-254348;				
17	Wm. Bolthouse Farms, Inc. v. City of				
18	Lancaster, Diamond Farming Co. v. Lancaster, Diamond Farming Co. v. Palmdale Water				
19	Dist., Superior Court of California, County of Riverside, Case Nos. RIC 353840, RIC				
20	344436, RIC 344668;				
21	Rebecca Lee Willis v. Los Angeles County Waterworks District No. 40				
22	Superior Court of California, County of Los Angeles, Case No. BC364553;				
23					
24	Court of California, County of Los Angeles, 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				
28					
	1080937.1	1			
	SPECIAL INTERROGATORIES, SET ONE, PRO	POUNDED 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 information reasonably available to you permits. If an interrogatory cannot be answered 11 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 objectionable, the remainder of the interrogatory shall be answered. If an objection is made to an 16 17 interrogatory or to part of an interrogatory, the specific ground for the objection shall be set forth clearly in the response. If an objection is based on the claim of privilege, the particular privilege 18 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

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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MUSICK, PEELER & GARRETT LLP

ATTORNEYS AT LAW

SPECIAL INTERROGATORIES, SET ONE, PROPOUNDED TO GRANITE CONSTRUCTION COMPANY

3. "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".

4. "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".

5. "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".

6. "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".

7. "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".

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MUSICK, PEELER & GARRETT LLP

1	SPECIAL INTERROGATORIES, SET ONE	
2	2 Demand is hereby made for production of the following:	
3	3 SPECIAL INTERROGATORY NO. 1.:	
4	State the residential address of William Taylor sufficiently to enable LITTLE ROCK to	
5	determine where to notice his deposition.	
6	SPECIAL INTERROGATORY NO. 2.:	
7	State the residential address of Richard Zimmer sufficiently to enable LITTLE ROCK to	
8	determine where to notice his deposition.	
9	SPECIAL INTERROGATORY NO. 3.:	
10	State the residential address of Joseph D. Hughes sufficiently to enable LITTLE ROCK to	
11	determine where to notice his deposition.	
12	SPECIAL INTERROGATORY NO. 4.:	
13	State the residential address of Bob Joyce sufficiently that LITTLE ROCK sufficiently to	
14	enable LITTLE ROCK to determine where to notice his deposition.	
15	SPECIAL INTERROGATORY NO. 5.:	
16	State the residential address of Mike McLachlan sufficiently to enable LITTLE ROCK to	
17	determine where to notice his deposition.	
18	SPECIAL INTERROGATORY NO. 6.:	
19	State the residential address of Michael D. Davis sufficiently to enable LITTLE ROCK to	
20	determine where to notice his deposition.	
21	SPECIAL INTERROGATORY NO. 7.:	
22	State the amount of groundwater that YOU pumped from WELL 1 for each year from	
23	1987 through 2017.	
24 SPECIAL INTERROGATORY NO. 8.:		
25	State the amount of groundwater that YOU pumped from WELL 2 for each year from	
26	1987 through 2017.	
27	///	
28	///	
MUSICK, PEELER & GARRETT LLP	1080937.1 4	
ATTORNEYS AT LAW	SPECIAL INTERROGATORIES, SET ONE, PROPOUNDED TO GRANITE CONSTRUCTION COMPANY	

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 <u>2</u> , 2017 MUSICK, PEELER & GARRETT LLP			
12				
13	By:			
14	Theodore A. Chester, Jr.			
15	Stephen R. Isbell Attorneys for LITTLE ROCK SAND AND			
16	GRAVEL, INC.			
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MUSICK, PEELER & GARRETT LLP	1080937.1 5			
ATTORNEYS AT LAW	SPECIAL INTERROGATORIES, SET ONE, PROPOUNDED TO GRANITE CONSTRUCTION COMPANY			

11

EXHIBIT "A"



Image: state of the second state state of the second state			
2 Sama Clara County Case No. 1-05-CV-040053 Judicial Council Coordination ("JCCP") No. 4408 California Court of Appeal, Fourth District, Division Two, Case No. E065512 4 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 Musck Peeler & Garrett LLP, 650 Town Center Drive, Suite 1200, Costa Mesa, CA 92626-1925. 6 On December 12, 2017, I served the foregoing document described as: SPECIAL INTERROGATORES, SET ONE, PROPONDED TO GRANTE CONSTRUCTION COMPANY on the interested parties in this action by posting the document listed above to the http://www.avvatermaster.org website in regard to the Antelope Valley Groundwater Adjudication matter, pursuant to the Electronic Filing and Service Standing Order of Judge Komar and through the TwoLegal website (www.Twolegal.com). 10 The file transmission was reported as complete to all parties appearing on the http://www.avvatermaster.org electronic service list and (www.Twolegal.com) for the Antelope Valley Groundwater Case, Case No. 2005-1-CV-049053; ICCP 4408. 11 MatL: I enclosed the cocument(s) in a sealed envelope or package addressed to the persons at the address listed below and placed the envelope for collection and mailing. following our ordinary business practices. I am readity familiar with the practice of Musick, Peeler & Garrett LLP for collecting and processing correspondence for maliting. 14 Musick, Peeler & Garrett LLP for collecting and processing underschama, Jr. Kubs & Parker Statemann, Jr. Kubs & Parker State of California. 15 Motaner penalty of perjury under the laws of the State of	1	PROOF OF SERVICE	
3 Dudicial Council Coordination ("JCCP") No. 4408 4 California Court of Appeal, Fourth District, Division Two, Case No. E065512 4 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 9266-1925. 6 On December 12, 2017, I served the foregoing document described as: SPECIAL INTERNOGATORIES, SET ONE, PROPOUNDED TO CRANTTE CONSTRUCTION COMPANY on the interested parties in this action by posting the document listed above to the http://www.avwatermaster.org website in regard to the Antolope Valley Groundwater Adjudication matter, pursuant to the Electronic Filing and Service Standing Order of Judge Komar and through the TwoLegal website (www.Twolegal.com) 10 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. 12 B Y MAIL: 1 enclosed the document(s) in a sealed envelope or package addressed to the persons at the address listed below and placed the envelope for collection and mailing, it is deposited in the ordinary business practices. I am readily familiar with the practice of Musick, Peeler & Garrett LLP for collecting and processing correspondence for malting. To the ordinary business practices. I am readily familiar with the practice of Musick, Peeler & Garrett LLP for collecting and processing correspondence for malting. To the senvelope with postage fully prepaid. I am a resident or employed in the county where the mailing occurred. The envelope was placed in	2		
1 Artic of a bar of Charge Start of Start of California. My bariness address is Musick Peeler & Garrett LLP, 650 Town Center Drive, Suite 1200, Costa Mesa, CA 29262-1925. 6 On December 12, 2017, 1 served the foregoing document described as: SPECIAL. 7 INTERROGATORIES, SET ONE, PROPOUNDED TO GRANTE CONSTRUCTION COMPANY on the interested parties in this action by posting the document listed above to the http://www.auvatermaster.org website in regard to the Antelope Valley Groundwater Adjudication matter, pursuant to the Electronic Filing and Service Standing Order of Judge Komar and through the TwoLegal website (www.Twolegal.com). 10 The file transmission was reported as complete to all parties appearing on the http://www.auvatermaster.org electronic service list and (www.Twolegal.com) for the Antelope Valley Groundwater Cases, Case No. 2005-1-CV-049053; JCCP 44088. 11 http://www.auvatermaster.org electronic service list and (www.Twolegal.com) for the Antelope Valley Groundwater Cases, Case No. 2005-1-CV-049053; JCCP 44088. 12 BY MALL: 1 enclosed the document(s) in a sealed envelope or package addressed to the persons at the address listed below and placed the envelope for collection and mailing, following our ordinary business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am a resident or employed in the county where the mailing occurred. The envelope was placed in the mail at Costa Mesa, California. 16 becard C. Ruhs 17 Attorpeys for Granite Construction Company: Robert G. Kuhs 18 Bernard C. Barmann, Jr. Kuhs & Parker	3	Judicial Council Coordination ("JCCP") No. 4408	
Garrett LLP, 650 Town Center Drive, Suite 1200, Costa Mesa, CA 92626-1925. On December 12, 2017, I served the foregoing document described as: SPECIAL INTERROG ATORIES, SET OURS, PROPOUNDED TO GRANTE CONSTRUCTION COMPARY on the interested parties in this action by posting the document listed above to the http://www.avwatermaster.org website in regard to the Antelope Valley Groundwater Adjudication matter, pursuant to the Electronic Filing and Service Standing Order of Judge Komar and through the TwoLegal website (www.Twolegal.com). Image: 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. Image: Service Standing Order of Judge Komar and through the TwoLegal website (www.Twolegal.com) for the Antelope Valley Groundwater Cases, Case No. 2005-1-CV-049053; JCCP 4408. Image: Service Standing Order of Judge Komar and through the TwoLegal website (www.Twolegal.com) for the Antelope Valley Groundwater Cases, Case No. 2005-1-CV-049053; JCCP 4408. Image: Service Standing Order of Subside States Postal Service, in a sealed envelope or package addressed to the persons at the address listed below and placed the envelope for maling. Tollowing our ordinary business practices. I am readily familiar with the practice of Musick, Peeler & Garrett LLP for collecting and processing correspondence for maling. On the same day that correspondence is placed for collection and maling, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am a resident or employed in the county where the maling occurred. The envelope was placed in the mait	4	At the time of service, I was over 18 years of age and not a party to this action. I am	
7 INTERCOLATORIES, SET ONE, PROPOUNDED TO GRANTE CONSTRUCTION COMPANY on the interested parties in this action by posting the document listed above to the attribute of the state of	5		
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Adjudication matter, pursuant to the Electronic Filing and Service Standing Order of Judge Komar and through the TwoLegal website (www.Twolegal.com). 10 11 11 11 11 11 12 12 13 14 15 16 17 18 19 19 10 11 12 12 13 14 15 16 17 18 19 10 11 12 13 14 15 16 17 18 19 10 11 12 13 14 15 16 17 18 19 10 11 12	7	interested parties in this action by posting the document listed above to the	
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	MUSICK, PEELER & GARRETT LLP	1080027.1	
ATTORNEYS AT LAW 1080937.1 SPECIAL INTERROGATORIES, SET ONE, PROPOUNDED TO GRANITE CONSTRUCTION COMPANY			

SPECIAL INTERROGATORIES, SET ONE, PROPOUNDED TO GRANITE CONSTRUCTION COMPANY