

1 **MUSICK, PEELER & GARRETT LLP**

2 ATTORNEYS AT LAW  
ONE WILSHIRE BOULEVARD, SUITE 2000  
LOS ANGELES, CALIFORNIA 90017-3383  
TELEPHONE (213) 629-7600  
FACSIMILE (213) 624-1376

3 Theodore A. Chester, Jr. (State Bar No. 105405)

4 *t.chester@mpglaw.com*

5 Steven Casselberry (State Bar No. 74234)

*s.casselberry@mpglaw.com*

6 Stephen R. Isbell (State Bar No. 247151)

*s.isbell@mpglaw.com*

7 Attorneys for LITTLE ROCK SAND AND GRAVEL, INC.

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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**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.  
14 BC325201;

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

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

28 1080976.1

Judicial Counsel Coordination No. 4408

Santa Clara Case No. 1-05-CV-049053  
Assigned to Honorable Jack Komar

**RESPONSE TO FORM**  
**INTERROGATORIES, SET TWO,**  
**PROPOUNDED BY GRANITE**  
**CONSTRUCTION COMPANY**

1 PROPOUNDING PARTY: GRANITE CONSTRUCTION COMPANY

2 RESPONDING PARTY: LITTLE ROCK SAND AND GRAVEL, INC.

3 SET NO.: TWO

4 Pursuant to the provisions of *Code of Civil Procedure* Section 2030.210, *et seq.*, LITTLE  
5 ROCK SAND AND GRAVEL, INC. ("Responding Party" or "Little Rock"), hereby responds to  
6 FORM INTERROGATORIES, SET TWO, propounded by GRANITE CONSTRUCTION  
7 COMPANY ("Propounding Party" or "Granite") as follows:

8 **PRELIMINARY STATEMENT**

9 Each of the following responses is made solely for the purpose of this action. Each  
10 response is subject to any and all objections to competency, relevance, materiality, proprietary,  
11 and admissibility. In addition, each response is subject to any and all objections and/or grounds  
12 that would require the exclusion of any statement or material provided, or any part thereof, to any  
13 interrogatory which were asked of, or any statement or material provided by, witnesses present  
14 and testifying in court. All objections are reserved and may be asserted at the appropriate time,  
15 including trial or any evidentiary hearing. The responses are based upon information presently  
16 available to Responding Party. The fact that Responding Party has responded to or objected to  
17 any interrogatory should not be taken as an admission that the interrogatory or response thereto  
18 constitutes admissible evidence. The mere fact that Responding Party has responded to part of, or  
19 all of, any interrogatory is not intended to be, and shall not constitute a waiver by Responding  
20 Party of any objections to the interrogatory.

21 Responding Party has not completed its investigation and discovery of the matters at issue  
22 in this action and the responses are based upon its knowledge, information and belief as of this  
23 date. Responding Party reserves the right to make further responses if it appears that any omission  
24 or error has been made in connection with these responses or in the event future or more accurate  
25 information is available. The responses are made without prejudice to the right to present such  
26 additional evidence as may be later discovered or evaluated.

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1 (c) George Lane, President of Little Rock Sand and Gravel, Inc., who may be  
2 contacted through Little Rock's counsel of record.

3 (d) Grant Deed dated August 10, 1954, a copy of which Little Rock has already  
4 produced to Granite.

5  
6 (a) 31

7 (b) Little Rock has owned "Parcel 3," as described in Little Rock's operative First  
8 Amended Complaint, since 1954.

9 (c) George Lane, President of Little Rock Sand and Gravel, Inc., who may be  
10 contacted through Little Rock's counsel of record.

11 (d) Grant Deed dated August 10, 1954, a copy of which Little Rock has already  
12 produced to Granite.

13  
14 (a) 33

15 (b) Little Rock has owned "Parcel 1," as described in Little Rock's operative First  
16 Amended Complaint, since 1954.

17 (c) George Lane, President of Little Rock Sand and Gravel, Inc., who may be  
18 contacted through Little Rock's counsel of record.

19 (d) Grant Deed dated August 10, 1954, a copy of which Little Rock has already  
20 produced to Granite.

21  
22 (a) 35

23 (b) Little Rock has owned "Parcel 3," as described in Little Rock's operative First  
24 Amended Complaint, since 1954.

25 (c) George Lane, President of Little Rock Sand and Gravel, Inc., who may be  
26 contacted through Little Rock's counsel of record.

27 (d) Grant Deed dated August 10, 1954, a copy of which Little Rock has already  
28 produced to Granite.

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- 1 (a) 36  
2 (b) Not applicable, as Little Rock only objected to Request for Admission No. 36.  
3 (c) Not applicable, as Little Rock only objected to Request for Admission No. 36.  
4 (d) Not applicable, as Little Rock only objected to Request for Admission No. 36.  
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6 (a) 37  
7 (b) Not applicable, as Little Rock only objected to Request for Admission No. 37.  
8 (c) Not applicable, as Little Rock only objected to Request for Admission No. 37.  
9 (d) Not applicable, as Little Rock only objected to Request for Admission No. 37.  
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11 (a) 38  
12 (b) Not applicable, as Little Rock only objected to Request for Admission No. 38.  
13 (c) Not applicable, as Little Rock only objected to Request for Admission No. 38.  
14 (d) Not applicable, as Little Rock only objected to Request for Admission No. 38.  
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16 (a) 39  
17 (b) Not applicable, as Little Rock only objected to Request for Admission No. 39.  
18 (c) Not applicable, as Little Rock only objected to Request for Admission No. 39.  
19 (d) Not applicable, as Little Rock only objected to Request for Admission No. 39.  
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21 (a) 40  
22 (b) Not applicable, as Little Rock only objected to Request for Admission No. 40.  
23 (c) Not applicable, as Little Rock only objected to Request for Admission No. 40.

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(d) Not applicable, as Little Rock only objected to Request for Admission No. 40.

DATED: December 29, 2017

MUSICK, PEELER & GARRETT LLP

By: 

Theodore A. Chester, Jr.

Stephen R. Isbell

Attorneys for Plaintiff LITTLE ROCK SAND  
AND GRAVEL, INC.

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**VERIFICATION**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

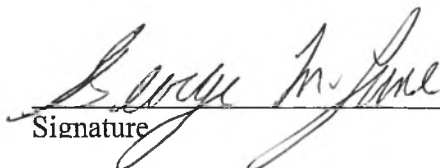
I have read the foregoing **RESPONSE TO FORM INTERROGATORIES, SET TWO, PROPOUNDED BY GRANITE CONSTRUCTION COMPANY** and know its contents.

☒ I am, President of Little Rock Sand and Gravel, Inc., a party to this action, and am authorized to make this verification for and on its behalf. I am informed and believe that the matters stated therein are true.

Executed on December 27, 2017, at Lancaster, California.

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

George M. Lane  
Print Name of Signator

  
Signature

1 **PROOF OF SERVICE**

2 Antelope Valley Groundwater Cases  
3 Santa Clara County Case No. 1-05-CV-049053  
4 Judicial Council Coordination ("JCCP") No. 4408  
5 California Court of Appeal, Fourth District, Division Two, Case No. E065512

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

9 On December 29, 2017, I served the foregoing document described as: **RESPONSE TO**  
10 **FORM INTERROGATORIES, SET TWO, PROPOUNDED BY GRANITE**  
11 **CONSTRUCTION COMPANY** on the interested parties in this action by posting the document  
12 listed above to the <http://www.avwatermaster.org> website in regard to the Antelope Valley  
13 Groundwater Adjudication matter, pursuant to the Electronic Filing and Service Standing Order of  
14 Judge Komar and through the OneLegal website ([www.onelegal.com](http://www.onelegal.com)).

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

18 ☒ **BY MAIL:** I enclosed the document(s) in a sealed envelope or package addressed to the  
19 persons at the address listed below and placed the envelope for collection and mailing,  
20 following our ordinary business practices. I am readily familiar with the practice of  
21 Musick, Peeler & Garrett LLP for collecting and processing correspondence for mailing.  
22 On the same day that correspondence is placed for collection and mailing, it is deposited in  
23 the ordinary course of business with the United States Postal Service, in a sealed envelope  
24 with postage fully prepaid. I am a resident or employed in the county where the mailing  
25 occurred. The envelope was placed in the mail at Costa Mesa, California.

26 Attorneys for Granite Construction Company:

27 Robert G. Kuhs  
28 Bernard C. Barmann, Jr.  
Kuhs & Parker  
1200 Truxtun Ave., Ste. 200  
P.O. Box 2205  
Bakersfield, CA 93303

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

Executed on December 29, 2017, at Costa Mesa, California.

/s/ Judy Jacobs  
Judy Jacobs