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7 **Attorneys for Cross-defendants,**  
8 LITTLE ROCK SAND AND GRAVEL, INC.,  
9 a California Corporation;  
10 THE GEORGE AND CHARLENE LANE FAMILY TRUST;  
11 THE FRANK AND YVONNE LANE 1993 FAMILY  
12 TRUST, DATED MARCH 5, 1993, AS RESTATED  
13 JULY 20, 2000; MONTE VISTA BUILDING SITES, INC.,  
14 a California Corporation; A.V. MATERIALS, INC.,  
15 a California Corporation; A.C. WARNACK,  
16 as Trustee of the A.C. WARNACK TRUST;  
17 HOLLIDAY ROCK CO., INC.,  
18 successor in interest to  
19 LITTLEROCK AGGREGATE CO., INC. dba  
20 ANTELOPE VALLEY AGGREGATE, INC.;  
21 LITTLEROCK AGGREGATE CO., INC. dba  
22 ANTELOPE VALLEY AGGREGATE, INC.

13  
14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

15 **FOR THE COUNTY OF LOS ANGELES**

16	ANTELOPE VALLEY GROUNDWATER CASES )	Judicial Council Coordination No.
17	Included Actions: )	4408
18	Los Angeles County Waterworks )	For filing purposes only:
19	District No. 40 v. Diamond )	Santa Clara County Case No.
20	Farming Co. Superior Court of )	1-05-CV-049053
21	California County of Los Angeles, )	[Assigned to the Honorable Jack
22	Case No. BC 325 201 )	Komar]
23	Los Angeles County Waterworks 2 )	NOTICE OF OBJECTIONS AND
24	District No. 40 v. Diamong )	OBJECTIONS TO PUBLIC WATER
	Farming Co. Superior court of )	SUPPLIERS' NOTICE OF DEPOSITION
	Califronia, County of Kern, Case )	OF GEORGE M. LANE AND REQUEST
	No. S-1500-CV-254-348 )	FOR PRODUCTION OF DOCUMENTS AT
		DEPOSITION BY LITTLE ROCK SAND
		AND GRAVEL, INC., THE
		GEORGE AND CHARLENE LANE FAMILY

1 Wm. Bolthouse Farms, Inc. V. City )  
of Lancaster Diamong Farming Co. )  
2 V. City of Lancaster Diamond )  
Farming Co. V. Palmdale Water )  
3 Dist. Superior Court of )  
California, County of Riverside, )  
4 consolidated actions, Case No. )  
RIC 353 840, RIC 344 436, RIC 344 )  
5 668

TRUST, THE FRANK AND YVONNE LANE  
1993 FAMILY TRUST, DATED MARCH  
5, 1993, AS RESTATED JULY 20,  
2000; MONTE VISTA BUILDING  
SITES, INC., A.V. MATERIALS,  
INC., A.C. WARNACK, AS TRUSTEE  
OF THE A.C. WARNACK TRUST,  
HOLLIDAY ROCK CO., INC., AND  
LITTLEROCK AGGREGATE CO., INC.  
DBA ANTELOPE VALLEY AGGREGATE,  
INC.

7  
8 Date: January 18, 2013  
Time: 9:00 a.m.

9 PLEASE TAKE NOTICE that cross-defendants LITTLE ROCK SAND  
10 AND GRAVEL, INC., HOLLIDAY ROCK CO., INC., successor in interest  
11 to LITTLEROCK AGGREGATE CO., INC. dba ANTELOPE VALLEY AGGREGATE,  
12 INC., LITTLEROCK AGGREGATE CO., INC. dba ANTELOPE VALLEY  
13 AGGREGATE, INC., THE FRANK AND YVONNE LANE 1993 FAMILY TRUST,  
14 DATED MARCH 5, 1993, AS RESTATED JULY 20, 2000, THE GEORGE AND  
15 CHARLENE LANE FAMILY TRUST, MONTE VISTA BUILDING SITES, INC.,  
16 A.V. MATERIALS, INC. and A.C. WARNACK, as trustee of THE A.C.  
17 WARNACK TRUST, (collectively "Cross-defendants") hereby object  
18 to the Public Water Supplier's Notice of Deposition of George M.  
19 Lane and the attached Request for Production of Documents that  
20 has been scheduled for January 18, 2013 at 9:00 a.m. on the  
21 following grounds:

22 The deposition of John Calandri and George Lane were  
23 initially scheduled on different dates. However, subsequently  
24 to the scheduling conference, the deposition of John Calandri

1 was moved to the same date and time as the deposition of George  
2 M. Lane. Counsel for George M. Lane and other cross-defendants  
3 need to participate in the deposition of John Calandri, and  
4 object to these two depositions being scheduled for the same  
5 date and time.

6 1. THE Notice of Deposition and Request for Production  
7 served on January 7, 2013 fails to comply with the Code of Civil  
8 Procedure, the December 12, 2012 Case Management Order for Phase  
9 4 Trial ("Order"), and the requirements of statutory and  
10 constitutional due process in that the notice directs the  
11 scheduling of over one hundred and thirty depositions with the  
12 required production of documents commencing January 10-31, 2013,  
13 which requests provide insufficient and reasonable time to  
14 investigate, conduct discovery and prepare the necessary  
15 response essential to protection of valuable land and water  
16 rights at issue in the Antelope Valley Groundwater Cases.

17 These cross-defendants each incorporate herein by reference  
18 the grounds that they previously joined in with regard to  
19 objections to the depositions in this action in relation to this  
20 Phase IV Trial.

#### 21 REQUESTS FOR PRODUCTION

##### 22 Request No. 2

23 Objection. This request is vague and ambiguous, overbroad  
24 as to the phrase "all DOCUMENTS THAT relate to YOUR current

1 pumping." In light of the extremely limited time constraints  
2 required by the Notice it is unreasonable and unduly oppressive  
3 to require the deponent(s) to complete the necessary  
4 investigation for such a multiple and broad request within the  
5 few days prior to the deposition.

6 Request Nos. 3, 5, 7, 9, 11, 13, 14 and 18

7 Objection. The documents sought are not relevant, nor  
8 reasonably calculated to lead to the discovery of admissible  
9 evidence, in relation to the subject matter of the Phase 4  
10 trial. The Order provides that "The Phase 4 trial will address  
11 the issue of current groundwater production of all parties for  
12 the calendar year 2011 and January through November 30, 2012."  
13 The subject requests require the production of documents and  
14 related information concerning groundwater production for years  
15 other than 2011 and 2012, and has failed to establish how such  
16 information is relevant to the issues to be litigated during the  
17 Phase 4 trial.

18 Request Nos. 13 and 14

19 Objection. The documents sought in these requests exist in  
20 the public domain and are equally available to the Public Water  
21 Suppliers.

22 Request No. 17

23 Objection. This request is vague and ambiguous and  
24 overbroad. This request is unduly burdensome and oppressive.

1 This request may also seek information that is confidential  
2 and/or trade secrets.

3 Request No. 18

4 Objection. This request is vague and ambiguous and  
5 overbroad as to scope and time. This request violates the  
6 court's discovery orders and case management orders relating to  
7 the Phase IV trial. This request is unduly burdensome and  
8 oppressive. This request seeks information that is not  
9 relevant, nor reasonably calculated to lead to the discovery of  
10 admissible evidence in relation to the Phase IV Trial.

11 Dated: January 15, 2013

TAYLOR & RING

12  
13 By: 

14 James W. Lewis  
15 Attorneys for Cross-  
16 Defendants HOLLIDAY ROCK  
17 CO., INC., successor in  
18 interest to LITTLE ROCK  
19 AGGREGATE CO., INC. dba  
20 ANTELOPE VALLEY  
21 AGGREGATE, INC.; THE  
22 FRANK AND YVONNE LANE  
23 1993 FAMILY TRUST, DATED  
24 MARCH 5, 1993, AS  
RESTATED JULY 20, 2000,  
successor in interest to  
FRANK A. LANE, ROE 612;  
THE GEORGE AND CHARLENE  
LANE FAMILY TRUST,  
Successor in interest to  
George M. Lane, Roe 316;  
MONTE VISTA BUILDING  
SITES, INC., a  
California Corporation;

A.V. MATERIALS, INC., a  
California Corporation,  
ROE 9; A.C. WARNACK,  
as Trustee of the A.C.  
WARNACK TRUST; LITTLE  
ROCK SAND AND GRAVEL,  
INC.

## STATE OF CALIFORNIA

On January 15, 2013, I served the foregoing document, described as:

on the interested parties in this action in the following manner:

Executed on January 15, 2013 at Los Angeles, California.

XX (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

James W. Lewis