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1	James W. Lewis (SBN 207599) TAYLOR & RING		
2	10900 Wilshire Boulevard, Suite 920 Los Angeles, California 90024		
3	Telephone: (310) 209-4100 Facsimile: (310) 208-5052		
4			
5	Attorneys for Cross-defendants, LITTLE ROCK SAND AND GRAVEL, INC.,		
6	a California Corporation; THE GEORGE AND CHARLENE LANE FAMILY	Y TRUST;	
7	THE FRANK AND YVONNE LANE 1993 FAMILY TRUST, DATED MARCH 5, 1993, AS RESTATED		
8	JULY 20, 2000; MONTE VISTA BUILDING SITES, INC., a California Corporation; A.V. MATERIALS, INC.,		
9	a California Corporation; HOLLIDAY ROCK CO., INC.,		
10	successor in interest to LITTLEROCK AGGREGATE CO., INC. dba		
11	ANTELOPE VALLEY AGGREGATE, INC.; LITTLEROCK AGGREGATE CO., INC. dba		
12	ANTELOPE VALLEY AGGREGATE, INC.		
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14	SUPERIOR COURT OF THE STATE OF CALIFORNIA		
15	FOR THE COUNTY OF	F LOS ANGELES	
16	ANTELOPE VALLEY GROUNDWATER CASES	) Judicial Council Coordination No ) 4408	
17	Included Actions:	) For filing purposes only:	
18	Los Angeles County Waterworks District No. 40 v. Diamond	) Santa Clara County Case No. ) 1-05-CV-049053	
19	Farming Co. Superior Court of California County of Los Angeles,	(Assigned to the Honorable Jack ) Komar	
20	Case No. BC 325 201	) NOTICE TO GRANITE CONSTRUCTION	
21	Los Angeles County Waterworks 2 District No. 40 v. Diamong	COMPANY TO APPEAR AND PRODUCE DOCUMENTS AT TRIAL	
22	Farming Co. Superior court of	) Date: May 28, 2013	
23	Califronia, County of Kern, Case No. S-1500-CV-254-348	Time: 9:00 a.m. Place: 111 N. Hill Street Los Angeles, CA	
24	Wm. Bolthouse Farms, Inc. V. City	Dept.: TBD	

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of Lancaster Diamong Farming Co. V. City of Lancaster Diamond Farming Co. V. Palmdale Water Dist. Superior Court of California, County of Riverside, consolidated actions, Case No. RIC 353 840, RIC 344 436, RIC 344 668

PLEASE TAKE NOTICE that William Taylor and Steve McCracken of Granite Construction Company are hereby requested to attend the trial in this matter before the Superior Court of the County of Los Angeles on May 28, 2013 at 9:00 a.m. in Department "1", located at 111 North Hill Street, Los Angeles, California, or such other location as may be ordered by the court, and to testify as witnesses in this case.

Granite Construction Company, William Taylor and Steve McCracken have in their possession or under their control and are hereby requested to bring to the trial the original documents described in the attached Exhibit A.

Dated: May 8, 2013

TAYLOR & RING

By:

James W./Lewis Attorneys for Cross-Defendants HOLLIDAY ROCK CO., INC., successor in interest to LITTLEROCK AGGREGATE CO., INC. dba ANTELOPE VALLEY AGGREGATE, INC.; THE FRANK AND YVONNE LANE

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1993 FAMILY TRUST, DATED 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.

## EXHIBIT A

### I. DEFINITIONS

11.

The following words and phrases shall govern the construction of this document unless the context otherwise requires:

1. "DOCUMENTS" means "writing" as defined by Evidence Code section 250 and includes drafts, originals and duplicates of written, graphic, computer or otherwise recorded matters, whether stored in written, electronic, magnetic or photographic format or by any other means.

# II. DOCUMENTS TO BE PRODUCED

- 1. All DOCUMENTS constituting GRANITE CONSTRUCTION

  COMPANY'S records evidencing the amount of groundwater pumped on the real properties it leases from LITTLEROCK SAND AND GRAVEL,

  INC. in the Littlerock area of the Antelope Valley from 2000 to 2012.
- 2. All DOCUMENTS demonstrating how GRANITE CONSTRUCTION COMPANY has calculated its groundwater pumping on the real properties it leases from LITTLEROCK SAND AND GRAVEL, INC. in the Littlerock area of the Antelope Valley from 2000 to 2012.
- 3. All DOCUMENTS that GRANITE CONSTRUCTION COMPANY has produced in its discovery responses for the Phase IV Trial.

- 4. All DOCUMENTS that GRANITE CONSTRUCTION COMPANY has produced for the Phase IV Trial with the declaration of William Taylor.
- 5. All DOCUMENTS that GRANITE CONSTRUCTION COMPANY references or produces in the Declaration of Steve McCracken that is submitted for the Phase IV Trial.

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# PROOF OF SERVICE (C.C.P. 1013A, 2015.5)

#### STATE OF CALIFORNIA

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen years and not a party to the within action; my business address is 10900 Wilshire Boulevard, Suite 920, Los Angeles, California 90024.

On May 8, 2013, I served the foregoing document, described as:

NOTICE TO GRANICE CONSTRUCTION COMOPANY TO APPEAR AND PRODUCE DOCUMENTS AT TRIAL

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

X BY ELECTRONIC SERVICE AS FOLLOWS by posting the document(s) listed above to the Santa Clara website in the action of the Antelope Valley Groundwater Litigation, Judicial Council Coordination Proceeding No. 4408, Santa Clara Case No. 1-05-CV-049053.

Executed on May 8, 2013 at Los Angeles, California.

<u>XX</u> (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

