

James W. Lewis (SBN 207599)
TAYLOR & RING
10900 Wilshire Boulevard, Suite 920
Los Angeles, California 90024
Telephone: (310) 209-4100
Facsimile: (310) 208-5052

Attorneys for Cross-defendants,
LITTLE ROCK SAND AND GRAVEL, INC.,
a California Corporation;
THE GEORGE AND CHARLENE LANE FAMILY TRUST;
THE FRANK AND YVONNE LANE 1993 FAMILY
TRUST, DATED MARCH 5, 1993, AS RESTATED
JULY 20, 2000; MONTE VISTA BUILDING SITES, INC.,
a California Corporation; A.V. MATERIALS, INC.,
a California Corporation;
HOLLIDAY ROCK CO., INC.,
successor in interest to
LITTLE ROCK AGGREGATE CO., INC. dba
ANTELOPE VALLEY AGGREGATE, INC.;
LITTLE ROCK AGGREGATE CO., INC. dba
ANTELOPE VALLEY AGGREGATE, INC.

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

ANTELOPE VALLEY GROUNDWATER CASES)	Judicial Council Coordination No.
)	4408
Included Actions:)	
Los Angeles County Waterworks)	For filing purposes only:
District No. 40 v. Diamond)	Santa Clara County Case No.
Farming Co. Superior Court of)	1-05-CV-049053
California County of Los Angeles,)	
Case No. BC 325 201)	[Assigned to the Honorable Jack
)	Komar]
Los Angeles County Waterworks 2)	NOTICE TO ANTELOPE VALLEY EAST
District No. 40 v. Diamong)	KERN WATER AGENCY'S CUSTODIAN OF
Farming Co. Superior court of)	RECORDS TO APPEAR AND PRODUCE
Califronia, County of Kern, Case)	DOCUMENTS AT TRIAL
No. S-1500-CV-254-348)	
Wm. Bolthouse Farms, Inc. V. City)	Date: February 10, 2014
)	Time: 9:00 a.m.
)	Place: 111 N. Hill Street
)	Los Angeles, CA
)	Dept.: Old Dept. 1

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

6 PLEASE TAKE NOTICE that PURSUANT TO Code of Civil Procedure
7 section 1987(b) and (c) these cross-defendants request that
8 ANTELOPE VALLEY EAST KERN WATER AGENCY's ("AVEK") designated
9 Custodian of Records appear at the trial in the above-captioned
10 matter on February 10, 2014 at 9:00 a.m. in (old) Department "1"
11 of the Los Angeles Superior Court, located at 111 North Hill
12 Street, Los Angeles, California, or such other location as may
13 be ordered by the court, to testify as witnesses in this case.

14 PLEASE TAKE FURTHER NOTICE THAT pursuant to Code of Civil
15 Procedure section 1987(c) these cross-defendants request that
16 its Custodian of Records produce the original documents listed
17 in the attached Exhibit A, which AVEK has in their possession or
18 under their control.

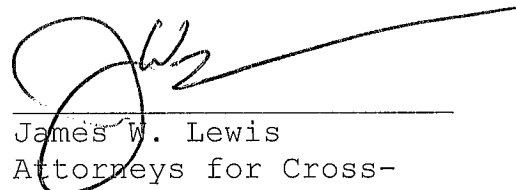
19 These requests are made pursuant to section 1987(b) and (c)
20 of the Code of Civil Procedure, which provide that the giving of
21 this notice has the same effect as the service of a subpoena and
22 that, in the event of noncompliance with this notice, the
23 parties shall have such rights, and the court may make such
24 orders, including the imposition of sanctions, as in the case of

1 a subpoena for attendance before the court.

2 Dated: January 17, 2014

TAYLOR & RING

3
4 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
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.

1 EXHIBIT A

2 **I. DEFINITIONS**

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

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

11 2. "AVEK" shall mean ANTELOPE VALLEY EAST KERN WATER
12 AGENCY, any of their agents, representatives, officers or
13 employees.

14 **II. DOCUMENTS TO BE PRODUCED**

15 1. The DOCUMENTS prepared by AVEK, including sales
16 ledgers, or other similar documents, showing the quantities of
17 water purchased from AVEK by George Lane, the George and
18 Charlene Lane Family Trust, Frank Lane, the Frank and Yvonne
19 Lane Family Trust, and/or Yvonne Lane between 1962 and the
20 present date at real property located at 60th Street West and
21 Avenue L in Lancaster, California.

22 2. The DOCUMENTS prepared by AVEK, including sales
23 ledgers, or other similar documents, showing the quantities of
24 water purchased from AVEK by George Lane, the George and

1 Charlene Lane Family Trust, Frank Lane, the Frank and Yvonne
2 Lane Family Trust, and Yvonne Lane between 1962 and the present
3 at real property located at or near 70th Street West and Avenue N
4 in Palmdale, California 93551.

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 January 17, 2014, I served the foregoing document, described as:

NOTICE TO ANTELOPE VALLEY EAST KERN WATER AGENCY'S CUSTODIAN OF RECORDS 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 January 17, 2014 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

