

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
LITTLEROCK AGGREGATE CO., INC. dba
ANTELOPE VALLEY AGGREGATE, INC.;
LITTLEROCK 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)	
District No. 40 v. Diamong)	NOTICE TO ANTELOPE VALLEY EAST
Farming Co. Superior court of)	KERN WATER AGENCY TO APPEAR
Califronia, County of Kern, Case)	AND PRODUCE DOCUMENTS AT
No. S-1500-CV-254-348)	TRIAL
)	
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 ("AVEK") produce
9 witnesses Tom Barnes and Dwayne Chisam at the trial in the
10 above-captioned matter on February 10, 2014 at 9:00 a.m. in
11 (old) Department "1" of the Los Angeles Superior Court, located
12 at 111 North Hill Street, Los Angeles, California, or such other
13 location as may be ordered by the court, to testify as witnesses
14 in this case.

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

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

1 orders, including the imposition of sanctions, as in the case of
2 a subpoena for attendance before the court.

3 Dated: January 17, 2014

TAYLOR & RING

4
5 By: 

James W. Lewis
Attorneys for Cross-
Defendants HOLLIDAY ROCK
CO., INC., successor in
interest to LITTLE ROCK
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.

EXHIBIT A

I. DEFINITIONS

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.

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

II. DOCUMENTS TO BE PRODUCED

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

2. The DOCUMENTS prepared by AVEK, including sales ledgers, or other similar documents, showing the quantities of 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 TO APPEAR AND PRODUCE DOCUMENTS AT TRIAL

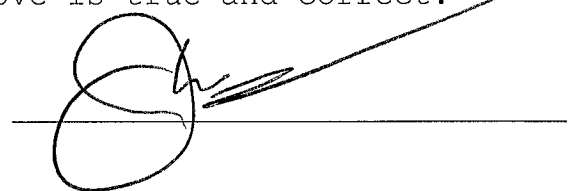
on the interested parties in this action in the following manner:

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

A handwritten signature in black ink, appearing to be 'James W. Lewis', is written over a horizontal line. The signature is stylized with a large loop at the beginning and a long, sweeping stroke extending to the right.