

1 BRADLEY T. WEEKS, Bar No. 173745
2 CHARLTON WEEKS LLP
3 1031 West Avenue M-14, Suite A
4 Palmdale, CA 93551
5 (661) 265-0969

6 Attorney for Quartz Hill Water District
7 Defendant/Cross Complainant

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF LOS ANGELES-CENTRAL DISTRICT

10 ANTELOPE VALLEY GROUNDWATER
11 CASES

12 Included Actions:

13 Los Angeles County Waterworks District No.
14 40 v. Diamond Farming Co.
15 Superior Court of California, County of Los
16 Angeles, Case No. BC325201;

17 Los Angeles County Waterworks District
18 No. 40 v. Diamond Farming Co.
19 Superior Court of California
20 County of Kern, Case No. S-1500-CV-254-
21 348;

22 Wm. Bolthouse Farms, Inc. v. City of
23 Lancaster
24 Diamond Farming Co. v. City of Lancaster
25 Diamond Farming Co. v. Palmdale Water Dist.
26 Superior Court of California
27 County of Riverside, consolidated actions
28 Case Nos. RIC 353840, RIC 344436,
RIC 344668.

**Judicial Council Coordination Proceeding No.
4408**

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

REQUESTS FOR ADMISSIONS (SET ONE)

25 PROPOUNDING PARTY: QUARTZ HILL WATER DISTRICT

26 RESPONDING PARTY: SEE EXHIBIT ONE

27 SET NO.: ONE

1 Pursuant to the provisions of Code of Civil Procedure §2033.010 you are hereby requested
2 to admit or deny the following matters under oath within thirty (30) days, which time may be
3 extended for service by mail as provided in the Code of Civil Procedure.

4
5 **Request for Admission Number 1.**

6 Admit YOU (YOU refers to the party responding to these requests) own no real property in the
7 BASIN (BASIN shall be defined as on and below the ground surface within the jurisdictional area
8 defined by the court in this matter by order dated March 16, 2007).

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10 **Request for Admission Number 2.**

11 Admit YOU pump no groundwater in the BASIN.

12
13 **Request for Admission Number 3.**

14 Admit YOU use no groundwater in the BASIN.

15
16 **Request for Admission Number 4.**

17 Admit YOU use no water in the BASIN.

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19
20 Dated: November 10, 2011

CHARLTON WEEKS LLP



Bradley T. Weeks
Attorney for Quartz Hill Water District

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- 1 A. David Kagon
- 2 A.C. Warnack, as Trustee of The A.C. Warnack Trust
- 3 A.V. United Mutual Group
- 4 Abc Williams Enterprises Lp
- 5 Adams Bennett Investments, LLC
- 6 Airtrust Singapore Private Limited
- 7 Alex Wodchis
- 8 Allen Alevy
- 9 Alta Vista SunTower, LLC
- 10 Anaverde LLC
- 11 Andreas Hauke
- 12 Andrews, Franklin D.
- 13 Andrews, Treba
- 14 Angelo and Dolores M. Cassara as Trustees of the Cassara Marital Trust
- 15 Antelope Valley Country Club Improvement Company, Inc.
- 16 Antelope Valley East-Kern Water Agency
- 17 Antelope Valley Ground Water Agreement Association
- 18 Antelope Valley Joint Union High School District
- 19 Antelope Valley Water Company
- 20 Antelope Valley Water Storage LLC
- 21 Antonio U. Agustines
- 22 Arklin Brothers Enterprises
- 23 Arklin, Philip H.
- 24 Aurora P. Gabuya
- 25 Av Materials, Inc.
- 26 AV Solar Ranch 1, LLC
- 27 B. J. Calandri
- 28 Balice, Maria

- 1 Balice, Norman
- 2 Barbara L. Keys
- 3 Barry S. Munz
- 4 Betty Gluckstein
- 5 Beverly J. Tobias
- 6 Big Rock Mutual Water Company
- 7 Big West Corp.
- 8 Billy H. Kim
- 9 Blayney, Randall
- 10 Bloom, Melody
- 11 Bolthouse Properties, LLC.
- 12 Bong S. Chang
- 13 Boron Community Services District
- 14 Boruchin, as Trustee for the John and Dora Boruchin Living Trust, John
- 15 Britton Associates, LLP
- 16 Bruce Burrows
- 17 Bujulian Brothers, Inc.
- 18 Burrows, Bruce - 300 A 40 H, LLC
- 19 Bushnell Enterprises, LLC
- 20 C.C. Thelma Cole
- 21 Cabahug, Jaime and Arlene
- 22 California Portland Cement Company
- 23 California, State Of
- 24 Calmat Land Co.
- 25 Calmat Land Company
- 26 Cameron Properties
- 27 Cameron Properties
- 28 Carol K. Claypool

- 1 Castle Butte Dev Corp
- 2 Catellus Development Corporation
- 3 Catharine M. Davis
- 4 Cenon Advincula
- 5 Chan, Hawk Nin - Self-Representing
- 6 Cheng Lin Kang
- 7 Chi S. Huang
- 8 City National Bank, Trustee
- 9 Clifford N. Claypool
- 10 Collicutt, Ikuku
- 11 Consolidated Rock Products
- 12 Consolidated Rock Products Co.
- 13 Copa De Oro Land Company, a California general partnership
- 14 County Sanitation District No. 14
- 15 County Sanitation District No. 20
- 16 Crail, Charles
- 17 Crail, Jean B.
- 18 Crystal Organic Farms LLC
- 19 Daniel Saparzadeh
- 20 Daryush Iraninezhad
- 21 David L. Bowers
- 22 Del Sur Ranch, LLC
- 23 Delmar D. Van Dam
- 24 Desert Lakes Community Services District
- 25 Diamond Farming Company
- 26 Donna L. Higelmire
- 27 Donna L. Simpson
- 28 Dorothy Dreier

- 1 E.C. Wheeler, LLC
- 2 Eastley, Philip
- 3 Edgar C. Ritter
- 4 Elias Qamout
- 5 Elizabeth Wong
- 6 enXco Development Corporation (Sued as Roe 452)
- 7 Esfandiar Kadivar
- 8 eSolar, Inc.
- 9 Estrada, David
- 10 Estrada, Rita
- 11 Eugene B. Nebeker
- 12 Eugene Gabrych
- 13 Eva Lai
- 14 Fares A. Lahoud
- 15 Florence Cernicky as Trustee of the Cernicky Trust
- 16 Forrest G. Godde
- 17 Forrest G. Godde (Indiv & Trustee Of The Forrest G. Godde Trust)
- 18 Frank S. Chiodo
- 19 Frank T. Nguyen
- 20 Frankie H. Salomon Trust
- 21 Fredrichsen, Lewis
- 22 Fry, Ron
- 23 Gailen Kyle
- 24 Gailen W. Kyle (Indiv & Trustee Of The Kyle Trust)
- 25 Gareth L. Simpson
- 26 Gaskell SunTower, LLC
- 27 Gateway Triangle Properties
- 28 Genus Lp

- 1 George C. Stevens, Jr.
- 2 George C. Stevens, Jr. as Trustee of the George C. Stevens, Jr. Trust
- 3 George E. Dreier
- 4 George L. Stimson, Jr.
- 5 Georgine J. Archer
- 6 Gertrude J. Van Dam
- 7 Ggf Llc
- 8 GLDEN SANDS MOBILE HOME PARK
- 9 Grimmway Enterprises, Inc.
- 10 Guss A. Barks, Jr.
- 11 Hancock, Catherine
- 12 Hancock, Timothy
- 13 Harbaugh, Barry
- 14 Harris, Steven
- 15 Healy Enterprises, Inc.
- 16 Helen Stathatos
- 17 Helen Stathatos
- 18 Henry Ngo
- 19 Herbert Katz
- 20 Herrmann, David
- 21 High Desert Investments, LLC
- 22 Hines Family Trust
- 23 Hong Dong
- 24 Hooshpack Dev Inc.
- 25 Huth, Clinto
- 26 Hypericum Interests Llc
- 27 Iannaccone, Elizabeth - Pro-per
- 28 Ildefonso S. Bayani

- 1 Illy King
- 2 J. Cole
- 3 Jack D. Kahlo
- 4 Jacob Chetrit
- 5 Jacqueline Ackerman
- 6 James W. Kyle
- 7 James W. Kyle (Indiv & Trustee Of The Kyle Family Trust)
- 8 Jeanna Y. Chang
- 9 Joan A. Funk
- 10 John A. Calandri (Indiv & As Trustee Of The John And B.J. Calandri 2001 Trust)
- 11 John Calandri
- 12 John Hui
- 13 Joseph H. Gluckstein
- 14 Juanita R. Nichols
- 15 Julia Kyle
- 16 Jung N. Tom
- 17 Jung, Irene
- 18 Jung, Paul
- 19 Kamram S. Shakib
- 20 Kathleen M. Munz
- 21 Kazuko Yoshimatsu
- 22 Keith E. Wales
- 23 Kootenai Properties, Inc.
- 24 Kutu Investment Co.
- 25 L. Gorrindo
- 26 Land Business Corporation
- 27 Landfield, Richard
- 28 Landinv, Inc.

- 1 Lapis Land Company, LLC
- 2 Lawrence A. Godde
- 3 Lawrence A. Godde (Indiv & Trustee Of Lawrence A. Godde Trust)
- 4 Lawrence Charles Trust
- 5 Lebata, Inc.
- 6 Leduc, Larry V.
- 7 Leduc, Sonia S.
- 8 Lee S. Chiou
- 9 Leroy Daniel Bronston
- 10 Leslie Property
- 11 Lewis Fredrichsen
- 12 Light Andrew & Youngnam
- 13 Lilian S. Kaufman
- 14 Little Baldy Mutual Water Company
- 15 Littlerock Aggregate Co., Inc. dba Antelope Valley Aggregate, Inc.
- 16 Llano Mutual Water Company
- 17 Llano-Del Rio Water Company
- 18 Los Angeles County Sanitation Districts
- 19 Lu, Clark C.
- 20 Lu, Danny C.
- 21 Lyman C. Miles
- 22 Lyon, Alice
- 23 M. R. Nasir
- 24 M. S. Chung
- 25 Malloy Family Partners
- 26 Mally Family Partners Lp
- 27 Man C. Lo
- 28 Maria B. Gorrindo

- 1 Marian Gabrych
- 2 Marianne Katz
- 3 Marilyn Burgess
- 4 Marilyn Hauke
- 5 Marilyn J. Prewoznik
- 6 Mark E. Thompson Apc Sharing Plan
- 7 Mark H. Shafron
- 8 Martin Schwartz
- 9 Marwan M. Aldais
- 10 Mary Wong
- 11 Marygrace H. Santoro
- 12 Marygrace H. Santoro (Indiv & Trustee Of The Marygrace H. Santoro Rev Trust)
- 13 Mashallah Afshar
- 14 Mason, David S.
- 15 Mathis, Joe
- 16 Matsui, Jeanne
- 17 Maurice H. Stans
- 18 Max Webb Trustee of the Webb Trust of 1978
- 19 Melinda E. Cameron
- 20 Melinda L. Gillman, Trustee of the Grubb Family Trust
- 21 Melody S. Bloom
- 22 Melvin Thomas Andrews and Margaret E. Andrews, Trustees of the Andrews Living Trust dated
- 23 August 2, 2004
- 24 Michael N. Higelmire
- 25 Middle Butte Mine, Inc.
- 26 Mike M. Wu
- 27 Milton S. Davis
- 28 Minoos Iraninezhad

- 1 Mission Bell Ranch Development
- 2 Mojave Public Utility District
- 3 Moon S. Chang
- 4 Morris Gluckstein
- 5 Morteza M. Foroughi
- 6 Mountain Brook Ranch, LLC
- 7 Murphy, Patty
- 8 New Anaverde, LLC
- 9 Nibbelink Family Trust
- 10 Nilda V. Bayani
- 11 Norman L. Poulsen
- 12 North Edwards Water District
- 13 Northrop Grumman Corporation (Sued As Doe 534)
- 14 Norton P. Recht, Jr.
- 15 Oliva M. Advincula
- 16 Oliver Nichols
- 17 Oscar Rudnick
- 18 Owl Properties, Inc.
- 19 Palmdale Hills Property LLC
- 20 Patricia A. Recht
- 21 Patricia J. Riggins
- 22 Paul Lai
- 23 Paula E. Ritter
- 24 Paula E. Ritter (Indiv & Trustee Of The Ritter Family Trust)
- 25 Pei Chin Lin
- 26 Peter G. Barks
- 27 Phelan Pinon Hills Community Services District
- 28 Pittman, Thomas

- 1 Prewoznik, Marilyn J.
- 2 Prewoznik, Marilyn J., as Trustee of the Marilyn J. Prewoznik Trust
- 3 R And M Ranch
- 4 Rafferty, Gary
- 5 Rafferty, Nona
- 6 Randall Y. Blayney
- 7 Raney, as Trustee for the Robert and Shirley Raney Living Trust , Robert D.
- 8 Raney, as Trustee for the Robert and Shirley Raney Living Trust , Shirley B.
- 9 Rebecca Rudnick
- 10 Red Dawn SunTower, LLC
- 11 Reinelt Rosenloecher Corp. Psp
- 12 Richard E. Landfield
- 13 Robert A. Jones
- 14 Robert L. Shafron
- 15 Rodrigo L. Gabuya
- 16 Roland N. Grubb
- 17 Romo Lake Los Angeles Partnership
- 18 Ronald E. Bowers
- 19 Rosamond Ranch
- 20 Rose Gluckstein
- 21 Rosemount Equities Llc Series
- 22 Royal Investors Group
- 23 Royal Western Properties Llc
- 24 Ruth A. Cumming
- 25 San Yu Enterprises, Inc.
- 26 Santa Monica Mountains Conservancy
- 27 Sarkis Djanibekyan
- 28 Savas Stathatos

- 1 Savas Stathatos (Indiv & Trustee Of The Stathatos Family Trust)
- 2 Service Rock Products, L.P. (originally named as Service Rock Products Corporation)
- 3 Seven Star United Llc
- 4 SGS Antelope Valley Development LLC
- 5 SHAKIB, KAMRAM
- 6 Sheep Creek Water Company
- 7 Sheldon R. Blum, Trustee for the Sheldon R. Blum Trust
- 8 Sheldon R. Blum, Trustee, for the Sheldon R. Blum Trust; & Sheldon R. Blum, Individually
- 9 Sheng Tom
- 10 Shiung Ru Lo
- 11 Shokrian, Elias
- 12 Shokrian, Shirley
- 13 Sierra SunTower, LLC
- 14 Simin C. Neman
- 15 Soaring Vista Properties, Inc.
- 16 Sorrento West Properties, Inc.
- 17 Souad R. Nasir
- 18 Southern California Edison Company
- 19 SPC Del Sur Ranch, LLC
- 20 State Of California 50TH District And Agricultural Association
- 21 State of California; Santa Monica Mountains Conservancy; 50th District Agricultural Association
- 22 Stevens, Jr., George C.
- 23 Su, Rong
- 24 Suchu T. Huang
- 25 Tejon Ranch Company
- 26 Tejon Ranchcorp
- 27 Terry A. Munz
- 28 The Philip H. Arklin Family Trust Dated April 28, 1994

- 1 Three Arklin Limited Liability Company, The
- 2 Tierra Bonita Ranch Company
- 3 Tiong D. Tiu
- 4 Tom, Jung N.
- 5 Treacy, Patrick
- 6 Triple M Property F.K.A. 3M Property Investment Co
- 7 Trustee For The Alevy Family Trust
- 8 Trustee For The Georgine J. Archer Trust
- 9 Trustee For The Kagon Trust
- 10 Trustee For The Katz Family Trust
- 11 Trustee For The Lilian S. Kaufman Trust
- 12 Trustee For The M. Gorrindo Trust
- 13 Trustee For The Marygrace H. Santoro Rev Trust
- 14 Trustee For The Miles Family Trust
- 15 Trustee For The P C Rev Inter Vivos Trust
- 16 Trustee For The Stathatos Family Trust
- 17 Trustee For The T.J. Cole Trust
- 18 Trustee Of The Barbara L. Keys Family Trust
- 19 Trustee Of The Burroughs Irr Family Trust
- 20 Trustee Of The Cumming Family Trust
- 21 Trustee Of The Foroughi Family Trust
- 22 Trustee Of The Forrest G. Godde Trust
- 23 Trustee Of The Fredrichsen Family Trust
- 24 Trustee Of The George C. Stevens, Jr. Trust
- 25 Trustee Of The Godde Trust
- 26 Trustee Of The Grubb Family Trust
- 27 Trustee Of The Illy King Family Trust
- 28 Trustee Of The John And B.J. Calandri 2001 Trust

- 1 Trustee Of The Kadivar Family Trust
- 2 Trustee Of The Kyle Family Trust
- 3 Trustee Of The Kyle Trust
- 4 Trustee Of The Marilyn J. Prewoznik Trust
- 5 Trustee Of The Nichols Family Trust
- 6 Trustee Of The Richard E. Landfield Trust
- 7 Trustee Of The Riggins Family Trust
- 8 Trustee Of The Ritter Family Trust
- 9 Trustee Of The Simpson Family Trust
- 10 Trustee Of The Tobias Family Trust
- 11 Trustee Of The Trueblood Family Trust
- 12 Trustee Of The Wu Family Trust
- 13 Tumbleweed SunTower, LLC
- 14 U.S. Borax, Inc.
- 15 Unison Investment Co., Llc
- 16 Valentine, Roland
- 17 Van Dam, Craig
- 18 Van Dam, Delmar D.
- 19 Van Dam, Gary
- 20 Van Dam, Gertrude J.
- 21 Veronika Reinelt
- 22 Victoria Rahimi
- 23 W. F. Clumen, Jr.
- 24 WAGAS Land Company LLC
- 25 Walter E. Helmick
- 26 Wanda E. Kyle
- 27 WDS California II, LLC
- 28 White Fence Farms Mutual Water Co. Inc.

CHARLTON WEEKS LLP
1031 West Avenue M-14, Suite A
Palmdale, CA 93551

- 1 William Bolthouse Farms, Inc.
- 2 Willis, Rebecca Lee
- 3 Wilma D. Trueblood
- 4 Wm. Bolthouse Farms, Inc.
- 5 Wood, Richard A.
- 6 Ying Wah Lam
- 7 Ying X. Dong
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Palmdale, CA 93551

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PROOF OF SERVICE

I am employed in the aforesaid county, State of California; I am over eighteen years of age and not a party to the within action; my business address is 1031 West Avenue M-14, Suite A, Palmdale, California, 93551.

On November 10, 2011, at my place of business at Palmdale, California, a copy of the following DOCUMENT(s):

REQUESTS FOR ADMISSION

By posting the DOCUMENT listed above to the Santa Clara Superior Court website in regard to the Antelope Valley Groundwater Matter:

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

Executed on November 10, 2011


Gayle Fenald