

# EXHIBIT A

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**FOR THE COUNTY OF LOS ANGELES**

REBECCA LEE WILLIS, on behalf of herself ) JUDICIAL COUNCIL COORDINATION  
and all others similarly situated, ) PROCEEDING NO. 4408

Plaintiff,

vs.

LOS ANGELES COUNTY WATERWORKS ) **NOTICE OF CLASS ACTION**  
DISTRICT NO. 40; CITY OF LANCASTER; )  
CITY OF PALMDALE; PALMDALE )  
WATER DISTRICT; LITTLEROCK CREEK )  
IRRIGATION DISTRICT; PALM RANCH )  
IRRIGATION DISTRICT; QUARTZ HILL )  
WATER DISTRICT; ANTELOPE VALLEY )  
WATER CO.; ROSAMOND COMMUNITY )  
SERVICE DISTRICT; and DOES 1 through )  
1,000; )  
Defendants. )

**TO: ALL PRIVATE LANDOWNERS WITHIN THE ANTELOPE VALLEY**

**THIS LAWSUIT MAY AFFECT YOUR PROPERTY RIGHTS**

This notice is to advise you about a pending class action lawsuit. You may be a member of the Class. *PLEASE TAKE THE TIME TO READ THIS IMPORTANT LEGAL NOTICE. YOU ARE REQUIRED TO RETURN THE ATTACHED RESPONSE FORM WITHIN SIXTY DAYS.*

**This case involves water rights in the Antelope Valley Groundwater Basin.** Rebecca Willis brought this case to protect her right and that of other landowners in the Basin to pump water on their properties in the future. The case has been combined with other cases to determine all the groundwater rights in the Basin. **The court has not yet decided the case.** This Notice is intended to inform you of the pendency of this case and advise you how you can protect your rights. You have been sent this Notice because as a property owner in the Antelope Valley your rights to pump and use groundwater on your property may be affected by this case.

## **ARE YOU A MEMBER OF THE CLASS?**

The class includes all private (i.e., non-governmental) landowners within the Antelope Valley Groundwater Basin, as defined by the Court. A map of the Basin is attached to this notice. The court has divided the class into two subclasses – those landowners who have (or whose predecessors have) pumped groundwater on their property and those who have not pumped groundwater. The subclass of pumpers is represented by \_\_\_\_; the subclass of non-pumpers is represented by Rebecca Willis.

## **WHAT IS THE CASE ABOUT?**

Under California law, property owners have a right to pump and use groundwater on their land. In this case, however, the naturally available supply of water in the Basin is not adequate to satisfy everyone who wants to use that water. Plaintiff Willis claims that she and other landowners have water rights which are superior to the rights of certain public water suppliers (listed as defendants on page 1) to use that water. The public water suppliers claim that their historical pumping has given them superior water rights. If the public water suppliers win, your rights to use the groundwater under your property may be cut back or even eliminated. The Court has not yet ruled on these claims.

## **WHAT DO YOU NEED TO DO?**

8. **You are required to complete and return the attached RESPONSE FORM by \_\_\_\_\_, 2008.** If you are within the Class definition (a non-governmental person or entity who owns property within the Basin), you should complete and return the attached response form stating whether you wish to (a) remain in the Class or (b) exclude yourself from the Class.

### *If you remain in the Class*

- You will be bound by the decision in the case, whether favorable or unfavorable; and
- Plaintiff Willis or plaintiff \_\_\_\_ and their respective attorneys will act as your representatives in this case, and you will not personally be obligated to pay any fees or costs out of your pocket.
- You *may*, but need not, hire your own lawyer at your own expense to represent you.

### *If you exclude yourself from the Class,*

- You will not be bound by any decision that affects the class;
- But you will be added to the lawsuit as an individual defendant, and you will have to represent

yourself or hire a lawyer to represent you.

**Please complete and return the attached response form no later than \_\_\_\_\_, 2008**

**to the following:**

Antelope Valley Groundwater Litigation

P.O. BOX \_\_\_\_\_

Irvine, CA 92614

**WHERE CAN YOU GET ADDITIONAL INFORMATION?**

The complaint and certain other documents from the litigation are available at [www.\\_\\_\\_\\_\\_](http://www.scefilings.org/cases/casehome.jsp?caseId=19). In addition, that website has a list of answers to certain other questions you may have. That website will be updated from time to time to advise you of the status of this litigation. Also, all of the documents filed in the case are available on the court's website at <http://www.scefilings.org/cases/casehome.jsp?caseId=19>.

In addition, you may contact the following counsel for the parties for further information:

David B. Zlotnick, Esq.

(PUMPER COUNSEL)

625 Broadway

Suite 635

San Diego, CA 92101

619-232-0331

(Class Counsel)

PLEASE DO NOT CALL OR WRITE THE COURT OR CLERK'S OFFICE. IF YOU HAVE ANY QUESTIONS, PLEASE CONSULT YOUR OWN COUNSEL OR CONTACT CLASS COUNSEL AT THE ADDRESS ABOVE.

Dated: \_\_\_\_\_, 2007

BY ORDER OF THE SUPERIOR COURT OF  
CALIFORNIA FOR THE COUNTY OF LOS ANGELES

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EXHIBIT A WILL BE THE MAP SHOWING THE BASIN (as set out in the Court's ruling).

**ANTELOPE VALLEY GROUNDWATER LITIGATION RESPONSE FORM**  
[SELF MAILER]

**PLEASE CHECK THE APPROPRIATE BOXES BELOW AND RETURN THIS MAILER AS SOON AS POSSIBLE AND IN ANY EVENT BEFORE \_\_\_\_\_, 2008. IF YOU HAVE ANY QUESTIONS, PLEASE CONSULT YOUR COUNSEL OR CLASS COUNSEL LISTED ABOVE. PLEASE CHECK ONLY ONE BOX FOR EACH ITEM. PLEASE THEN SIGN, FOLD, AND RETURN THE FORM.**

1. I DO \_\_\_ DO NOT \_\_\_ OWN PROPERTY WITHIN THE ANTELOPE VALLEY BASIN (AS SHOWN ON EXHIBIT A, ABOVE)

*IF YOU ANSWERED NO, PLEASE SIGN AND DATE BELOW AND RETURN THIS FORM. IF YOU ANSWERED YES, PLEASE CHECK **ONE** ANSWER FOR EACH STATEMENT BELOW:*

2. I AM \_\_\_ AM NOT \_\_\_ PRESENTLY PUMPING GROUNDWATER ON MY PROPERTY.
3. I (or my predecessor owners) DID \_\_\_ DID NOT \_\_\_ PUMP GROUNDWATER ON MY PROPERTY IN THE PAST
4. **PLEASE SELECT ONE OF THE FOLLOWING:**
- A. I WANT TO REMAIN IN THE CLASS. \_\_\_\_\_
- B. I WANT TO EXCLUDE MYSELF FROM THE CLASS. \_\_\_\_\_

ASSESSOR'S PARCEL NUMBER AND ADDRESS OR LEGAL DESCRIPTION OF YOUR PROPERTIES IN THE BASIN:

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MY ANTELOPE VALLEY PROPERTY(IES) TOTAL APPROXIMATELY \_\_\_\_\_ ACRES.

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(PRINT YOUR NAME)

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(SIGNATURE)

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(MAILING ADDRESS)

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(CITY, STATE, ZIP CODE)

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(E-mail address or telephone number)