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6 DISTRICT NO. 40

**EXEMPT FROM FILING FEES
UNDER GOVERNMENT CODE
SECTION 6103**

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15 SUPERIOR COURT OF THE STATE OF CALIFORNIA
16 COUNTY OF LOS ANGELES – CENTRAL DISTRICT

17 ANTELOPE VALLEY GROUNDWATER CASES

17 Included Actions:
18 Los Angeles County Waterworks District No. 40 v.
19 Diamond Farming Co., Superior Court of
California, County of Los Angeles, Case No. BC
325201;

20 Los Angeles County Waterworks District No. 40 v.
21 Diamond Farming Co., Superior Court of
California, County of Kern, Case No. S-1500-CV-
22 254-348;

23 Wm. Bolthouse Farms, Inc. v. City of Lancaster,
24 Diamond Farming Co. v. City of Lancaster,
Diamond Farming Co. v. Palmdale Water Dist.,
25 Superior Court of California, County of Riverside,
Case Nos. RIC 353 840, RIC 344 436, RIC 344 668

26 RICHARD WOOD, on behalf of himself and all
27 other similarly situated v. A.V. Materials, Inc., et
al., Superior Court of California, County of Los
28 Angeles, Case No. BC509546

Judicial Council Coordination
Proceeding No. 4408

CLASS ACTION

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

**PUBLIC WATER SUPPLIERS'
OPPOSITION TO THE WILLIS
CLASS' RE-NOTICE OF SECOND
MOTION TO ENFORCE
SETTLEMENT AGREEMENT
WITH PUBLIC WATERS
SUPPLIERS; MOTION TO
ENFORCE DUE PROCESS;
MOTION FOR COURT ORDER
FOR PAYMENT OF EXPERT
WITNESS FEES FOR THE WILLIS
CLASS FOR PHYSICAL
SOLUTION PROCEEDINGS**

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1 Los Angeles County Waterworks District No. 40, City of Palmdale, City of Lancaster,
2 Rosamond Community Services District, Littlerock Creek Irrigation District, Palm Ranch
3 Irrigation District, Desert Lake Community Services District, Palmdale Water District, Quartz
4 Hill Water District, and California Water Service Company (collectively, “Public Water
5 Suppliers”) hereby oppose the Willis Class’ Re-Notice of Second Motion to Enforce Settlement
6 Agreement With Public Waters Suppliers; Motion to Enforce Due Process; Motion for Court
7 Order for Payment of Expert Witness Fees for the Willis Class for Physical Solution Proceedings
8 (“Re-Noticed Motions”).

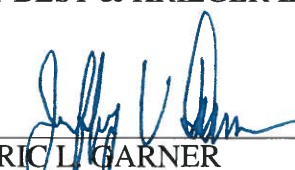
9 The Re-Noticed Motions are the third attempt by the Willis Class’ for an order deeming
10 the proposed Physical Solution to be inconsistent with the Willis Settlement, and for an order
11 requiring the Public Water Suppliers to pay for Willis Class’ expert witnesses. It is the second
12 attempt by the Willis Class’ to argue that a due process violation.

13 The Court has previously denied the Willis Class’ earlier motions. The Willis Class did
14 not submit new evidence or law in support of the Re-Noticed Motions. For those reasons, the
15 Public Water Suppliers hereby incorporate their previously presented oppositions, arguments, and
16 evidence in opposition to the Re-Noticed Motions. The Public Water Suppliers reserve their right
17 to submit further evidence, arguments, and/or briefs in opposition to the Re-Noticed Motions.

18 Dated: September 15, 2015

BEST BEST & KRIEGER LLP

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20
21 By


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WENDY Y. WANG
Attorneys for
LOS ANGELES COUNTY
WATERWORKS DISTRICT NO. 40

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PROOF OF SERVICE

I, Rosanna R. Pérez, declare:

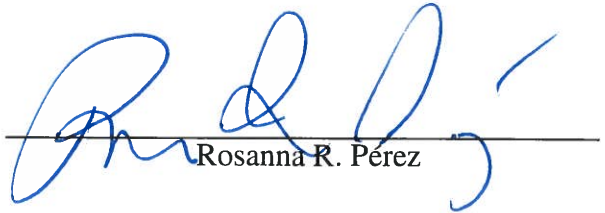
I am a resident of the State of California and over the age of eighteen years, and not a party to the within action; my business address is Best Best & Krieger LLP, 300 S. Grand Avenue, 25th Floor, Los Angeles, California 90071. On September 15, 2015, I served the following document(s):

PUBLIC WATER SUPPLIERS' OPPOSITION TO THE WILLIS CLASS' RE-NOTICE OF SECOND MOTION TO ENFORCE SETTLEMENT AGREEMENT WITH PUBLIC WATERS SUPPLIERS; MOTION TO ENFORCE DUE PROCESS; MOTION FOR COURT ORDER FOR PAYMENT OF EXPERT WITNESS FEES FOR THE WILLIS CLASS FOR PHYSICAL SOLUTION PROCEEDINGS



by posting the document(s) listed above to the Santa Clara County 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 above is true and correct. Executed on September 15, 2015, at Los Angeles, California.



Rosanna R. Pérez

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