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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF LOS ANGELES**

11 **ANTELOPE VALLEY**
12 **GROUNDWATER CASES**

) RELATED CASE TO JUDICIAL
) COUNCIL COORDINATION
) PROCEEDING NO. 4408
)

13 This Pleading Relates to Included Action:
14 REBECCA LEE WILLIS, on behalf of herself
and all others similarly situated,

) PLAINTIFF REBECCA WILLIS'
) STATUS CONFERENCE STATEMENT
)

15 Plaintiff,
16

17 vs.

18 LOS ANGELES COUNTY WATERWORKS
DISTRICT NO. 40; CITY OF LANCASTER;
19 CITY OF LOS ANGELES; CITY OF
PALMDALE; PALMDALE WATER
DISTRICT; LITTLEROCK CREEK
20 IRRIGATION DISTRICT; PALM RANCH
IRRIGATION DISTRICT; QUARTZ HILL
21 WATER DISTRICT; ANTELOPE VALLEY
WATER CO.; ROSAMOND COMMUNITY
22 SERVICE DISTRICT; MOJAVE PUBLIC
UTILITY DISTRICT; and DOES 1 through
23 1,000;

) Date: April 24, 2009
) Time: 9:00 a.m.
) Dept: 1
) Judge: Hon. Jack Komar
Coordination Trial Judge
)

24 Defendants.
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26 The Willis Class submits the following status conference statement outlining its positions
27 relative to discovery, Class notice, and trial issues.
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I. DISCOVERY

After considerable effort, a group of landowners served a uniform set of basic discovery requests on all the Public Water Suppliers. It is hoped that this will enable the Public water Suppliers to not have to respond to multiple overlapping requests. In turn, it is expected that the Public Water Suppliers will serve a uniform set of basic discovery on all the landowners.

Attached hereto as Exhibit A is a proposed protocol governing the production of documents by all parties. The Public Water Suppliers disapprove of these protocols particularly as to the allocation of costs. Most landowners believe the attached protocols are fair and will save all parties time and effort, as well as spare the Court from unnecessary discovery disputes.

II. CLASS NOTICE

The Willis Class Notice was mailed and published in accordance with the Court's Order. Willis suggests that the exclusion deadline be modified to be April 1, 2009 and has asked the Public Water Suppliers to stipulate to that modest extension. Counsel for District 40 is continuing to process the responses to the Notice and is due to report on that matter by the end of this month. The proposed stipulation is attached as Exhibit B.

III. PRELIMINARY INJUNCTION ISSUES

The Willis Class is attempting to resolve its issues relating to AGWA's Town Hall Meetings and suggests that the Court defer that issue.

IV. PHASE III TRIAL

Plaintiff Willis prepares for the Phase III trial. We continue to believe that the next phase should include not merely overdraft issues, but also the merits of the Suppliers' prescription claims.

Dated: April 21, 2009

KRAUSE KALFAYAN BENINK
& SLAVENS LLP

/s/Ralph B. Kalfayan
Ralph B. Kalfayan, Esq.
David B. Zlotnick, Esq.
Attorneys for Plaintiff and the Class

EXHIBIT A

Document Production Protocols

Case: Antelope Valley Case Map
 Created: 3/6/09 12:49:14 PM by RBK

Number	Steps	Protocols	Cost
1	Production organized by Request For Production Number (RFP #)	All documents produced must be organized and labeled to correspond with the categories in the demand.	Borne by producing party
2	Converting the documents into an electronic images.	All documents produced must be (1) electronically scanned; (2) unitized with separate document page breaks; (3) bates stamped with a three letter prefix and 7 digit number; and (4) if feasible, scanned with optical character recognition.	Borne by producing party
3	Format of electronic documents	All scanned documents should be in single page TIFF (tagged image format) file or Adobe PDF file format.	Borne by producing party
4	Copies made available	A disc shall be prepared of the electronically scanned documents and made available or copied for the benefit of anyone making a request of those records.	Borne by producing party.
5	Originals made available	Originals of all the documents shall be made available for inspection upon reasonable request.	Cost of copying is borne by the party making the request.
6	Review platform	Each party can perform its own review.	Borne separately by each firm
7	Objective coding	Each party can perform its own coding.	Borne separately by each firm
8	Subjective coding	Each party can perform its own coding.	Borne separately by each firm

EXHIBIT B

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

10 ANTELOPE VALLEY)
11 GROUNDWATER CASES)

) RELATED CASE TO JUDICIAL
) COUNCIL COORDINATION
) PROCEEDING NO. 4408
)

12 This Pleading Relates to Included Action:
13 REBECCA LEE WILLIS, on behalf of herself
and all others similarly situated,

) The Honorable Jack Komar
) Coordination Trial Judge
)

14 Plaintiff,

) STIPULATION AND ORDER
) REGARDING WILLIS CLASS NOTICE
)

15 vs.
16

17 LOS ANGELES COUNTY WATERWORKS)
DISTRICT NO. 40; CITY OF LANCASTER;)
18 CITY OF LOS ANGELES; CITY OF)
PALMDALE; PALMDALE WATER)
DISTRICT; LITTLEROCK CREEK)
19 IRRIGATION DISTRICT; PALM RANCH)
IRRIGATION DISTRICT; QUARTZ HILL)
20 WATER DISTRICT; ANTELOPE VALLEY)
WATER CO.; ROSAMOND COMMUNITY)
21 SERVICE DISTRICT; MOJAVE PUBLIC)
UTILITY DISTRICT; and DOES 1 through)
22 1,000;)

23 Defendants.
24

25 WHEREAS, on or about December 16, 2008, the Court signed Plaintiff
26 Willis' Revised Order Governing Class Notice (the "Order"), which provided, *inter*
27 *alia*, that Class members would have until March 1, 2009 to exclude themselves
28 from the Class; and

1 WHEREAS, the Order stated that such deadline would be subject to
2 modification by the Court upon a showing of good cause; and

3 WHEREAS, due to the size of the Class and other unavoidable delays, Class
4 Counsel could not respond to all of the many telephonic and e-mail inquiries they
5 received from Class Members before the March 1, 2009 deadline;

6 IT IS HEREBY STIPULATED by and between the parties that the deadline
7 for persons to have excluded themselves from the Class shall be extended to April 1,
8 2009. All exclusion request submitted by that date shall be deemed timely.

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10 Dated: April 21, 2009

KRAUSE, KALFAYAN, BENINK
& SLAVENS, LLP

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13 _____
14 Ralph B. Kalfayan, Esq.
15 David B. Zlotnick, Esq.
16 Attorneys for the Willis Class

BEST, BEST & KRIEGER, LLP

17
18 _____
19 Jeffrey Dunn, Esq.
20 On Behalf of all Public Water Suppliers

21 **ORDER**

22 APPROVED AND SO ORDERED:

23
24 Dated: April __, 2009

25 _____
26 Hon. Jack Komar,
27 Judge of the Superior Court
28 _____