

# EXHIBIT D

**SUMMARY NOTICE OF PROPOSED CLASS ACTION SETTLEMENT  
IN WILLIS V. LOS ANGELES COUNTY WATERWORKS DIST. NO. 40, ET AL.**

This Summary Notice is to advise you that there is a proposed settlement of the above class action, which is pending on behalf of persons who own land in the Antelope Valley Basin, as defined by the Court, on which they do not pump water (with certain specific exceptions). The proposed settlement does not provide any monetary compensation to the Class members, but protects Class Members' rights to make reasonable future uses of the groundwater underlying their properties.

On October \_\_, 2010, the Superior Court for Los Angeles County granted preliminary approval of the proposed settlement, subject to further consideration at a fairness hearing scheduled for December 17, 2010. The terms of the proposed settlement, as well as Class Members' options, are more fully detailed in a Notice of Proposed Class Action Settlement that was previously mailed to the last known addresses of all class members. You may find a copy of that Notice, as well as the Settlement Agreement and other relevant documents at <http://www.avgroundwater.com/Index.html>. Alternatively, you may call (800) \_\_\_\_\_ to request a copy of the NOTICE.

THE COURT HAS MADE NO DECISION AS TO LIABILITY AND THIS NOTICE IS NOT AN EXPRESSION OF ANY OPINION ON THE MERITS OF THE CLAIMS ASSERTED IN THE ACTION.