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

11 **ANTELOPE VALLEY**) **JUDICIAL COUNCIL COORDINATION**
12 **GROUNDWATER CASES**) **PROCEEDING NO. 4408**
13)
14 This Pleading Relates to Included Action:) **CASE NO. BC 364553**
REBECCA LEE WILLIS, on behalf of)
15 herself and all others similarly situated,)
16) **DECLARATION OF RALPH B.**
Plaintiff,) **KALFAYAN IN SUPPORT OF EX PARTE**
17 vs.) **APPLICATION FOR ORDER**
18) **SHORTENING TIME FOR HEARING ON**
LOS ANGELES COUNTY WATERWORKS) **MOTION TO COMPEL**
19 **DISTRICT NO. 40; CITY OF LANCASTER;)**
CITY OF PALMDALE; PALMDALE)
20 WATER DISTRICT; LITTLEROCK CREEK)
IRRIGATION DISTRICT; PALM RANCH)
21 IRRIGATION DISTRICT; QUARTZ HILL) **Date: February 24, 2011**
WATER DISTRICT; ANTELOPE VALLEY) **Time: 10:00 a.m.**
22 WATER CO.; ROSAMOND COMMUNITY) **Dept: 1**
SERVICE DISTRICT; PHELAN PINON) **Judge: Hon. Jack Komar**
23 HILL COMMUNITY SERVICE DISTRICT;) **Coordination Trial Judge**
and DOES 1 through 1,000;)
24 Defendants.)

25 I, Ralph B. Kalfayan, declare and state as follows:

26 1. I am a partner at the law firm of Krause Kalfayan Benink & Slavens, counsel for
27 the Willis Class in the above captioned matter. I submit this declaration in support of Plaintiffs'
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1 Ex parte Application for Order Shortrening Notice of Hearing on Motion to Compel Discovery.
2 The matters stated herein are true to the best of my own personal knowledge and, if called upon
3 as a witness to testify thereto, I would and could competently do so.

4 2. The Ex Parte Application along with the supporting papers may serve as
5 Plaintiff's Notice of Motion to Compel and Motion to Compel which has been filed with the
6 Court on this date. The delay in hearing this matter after the normal time for service of the
7 Notice of Motion would cause substantial hardship to Plaintiff because the Motion on Plaintiff's
8 petition for attorneys fees is set for hearing on March 22, 2011. Plaintiff seek affirmative
9 responses to the discovery and production of records before the due date of the reply brief,
10 March 15, 2011.

11 3. Defendant Public Water Suppliers were given notice of this Ex Parte Application
12 by phone via conference call on Friday, February 18, 2011, and by email on February 21, 2011.

13 4. Attached hereto as Exhibit A is Plaintiff's Statement of Items in Dispute.
14 Attached as Exhibit B is the discovery propounded by Plaintiff. Attached as Exhibit C are the
15 Public Water Suppliers' responses. Attached as Exhibit D are the City of Lancaster's responses.
16 Attached as Exhibit E are Phelan Pinon Hills' responses. Exhibits B through E are true and
17 correct copies of the discovery exchanged between the Parties.
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19 I declare under penalty of perjury and under the laws of the State of California that the
20 foregoing is true and correct. Executed on 22nd day of February, 2011, in San Diego, California.
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24 Ralph B. Kalfayan, Esq.
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