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

12 **ANTELOPE VALLEY**
13 **GROUNDWATER CASES**

) JUDICIAL COUNCIL COORDINATION
) PROCEEDING NO. 4408

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

) CASE NO. BC 364553

17 Plaintiff,

) **PLAINTIFF WILLIS' REQUEST FOR**
) **ENTRY OF FINAL JUDGMENT**

18 vs.

19 LOS ANGELES COUNTY WATERWORKS)
20 DISTRICT NO. 40; CITY OF LANCASTER;)
21 CITY OF LOS ANGELES; CITY OF)
22 PALMDALE; PALMDALE WATER)
23 DISTRICT; LITTLEROCK CREEK)
24 IRRIGATION DISTRICT; PALM RANCH)
25 IRRIGATION DISTRICT; QUARTZ HILL)
26 WATER DISTRICT; ANTELOPE VALLEY)
27 WATER CO.; ROSAMOND COMMUNITY)
28 SERVICE DISTRICT; and DOES 1 through)
1,000;

) Judge: Hon. Jack Komar
) Coordination Trial Judge

Defendants.

26 Plaintiff Rebecca Lee Willis respectfully requests that the Court enter the accompanying
27 Final Judgment memorializing and implementing the Willis' Class' settlement with the Public

1 Water Suppliers, which the Court approved by Order dated March 1, 2011. In support of this
2 application, Plaintiff states as follows.

3 1. On March 1, 2011, following notice and hearing, the Court entered an Order
4 approving the Willis Class' settlement with the Public Water Supplier Defendants as "fair and
5 reasonable to all affected parties."

6 2. In its March 1, 2011 Order, the Court approved the form of the Proposed Final
7 Judgment agreed upon by the settling parties, but deferred entry of that Judgment pending
8 resolution of plaintiff's motion for an award of attorneys' fees.

9 3. The Court heard argument on the fee motion on March 22, 2011, and the matter is
10 under submission (effective as of the March 30, 2011 filing of Plaintiff Willis' Declaration).

11 4. Prompt entry of the Final Judgment is critical to all of the settling parties for the
12 following reasons:

13 a. Until Final Judgment is entered and the appeal period expires, Plaintiff
14 and class counsel are in a state of uncertainty as to whether any of the parties who objected to the
15 settlement will appeal. Entry of the Final Judgment is therefore critical to ensure that the
16 settlement is truly final and that Plaintiff need not further participate in the litigation (except as
17 provided in the Stipulation of Settlement and Judgment).

18 b. Consistent with the above, the Stipulation of Settlement negotiated and
19 agreed upon by the settling parties provides that, with certain very limited exceptions, Class
20 Counsel will not seek fees from the Settling Defendants with respect to any efforts they
21 undertake following "the Court's entry of Final Judgment approving the Settlement." Stip at par.
22 VIII.D. Accordingly, it is in Defendants' interests that the proposed Final Judgment be entered
23 so that they are protected from exposure to fees for any future efforts that may be required.

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