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9	SUPERIOR COURT OF THE STATE OF CALIFORNIA	
10	FOR THE COUNTY OF LOS ANGELES	
11		
12 13	ANTELOPE VALLEY GROUNDWATER CASES)	JUDICIAL COUNCIL COORDINATION PROCEEDING NO. 4408
14 15	This Pleading Relates to Included Action: REBECCA LEE WILLIS, on behalf of herself) and all others similarly situated,	CASE NO. BC 364553
16	Plaintiff,	PLAINTIFF WILLIS' REQUEST FOR
17	vs.	ENTRY OF FINAL JUDGMENT
18 19 20	LOS ANGELES COUNTY WATERWORKS) DISTRICT NO. 40; CITY OF LANCASTER;) CITY OF LOS ANGELES; CITY OF PALMDALE; PALMDALE WATER DISTRICT; LITTLEROCK CREEK	
21	IRRIGATION DISTRICT; PALM RANCH) IRRIGATION DISTRICT; QUARTZ HILL)	Judge: Hon. Jack Komar Coordination Trial Judge
22	WATER DISTRICT; ANTELOPE VALLEY) WATER CO.; ROSAMOND COMMUNITY)	
23	SERVICE DISTRICT; and DOES 1 through 1,000;	
24	Defendants.	
25	Disinstiff Dahagas Las Williams and the last of the day	
26	Plaintiff Rebecca Lee Willis respectively requests that the Court enter the accompanying	
27	Final Judgment memorializing and implementing the Willis' Class' settlement with the Public	
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Water Suppliers, which the Court approved by Order dated March 1, 2011. In support of this application, Plaintiff states as follows.

- 1. On March 1, 2011, following notice and hearing, the Court entered an Order approving the Willis Class' settlement with the Public Water Supplier Defendants as "fair and reasonable to all affected parties."
- 2. In its March 1, 2011 Order, the Court approved the form of the Proposed Final Judgment agreed upon by the settling parties, but deferred entry of that Judgment pending resolution of plaintiff's motion for an award of attorneys' fees.
- 3. The Court heard argument on the fee motion on March 22, 2011, and the matter is under submission (effective as of the March 30, 2011 filing of Plaintiff Willis' Declaration).
- 4. Prompt entry of the Final Judgment is critical to all of the settling parties for the following reasons:
- a. Until Final Judgment is entered and the appeal period expires, Plaintiff and class counsel are in a state of uncertainty as to whether any of the parties who objected to the settlement will appeal. Entry of the Final Judgment is therefore critical to ensure that the settlement is truly final and that Plaintiff need not further participate in the litigation (except as provided in the Stipulation of Settlement and Judgment).
- b. Consistent with the above, the Stipulation of Settlement negotiated and agreed upon by the settling parties provides that, with certain very limited exceptions, Class Counsel will not seek fees from the Settling Defendants with respect to any efforts they undertake following "the Court's entry of Final Judgment approving the Settlement." Stip at par. VIII.D. Accordingly, it is in Defendants' interests that the proposed Final Judgment be entered so that they are protected from exposure to fees for any future efforts that may be required.

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5. More importantly, Rule 3.769 of the California Rules of Court unambiguously provides that "[i]f the Court approves the [proposed class action] settlement after the final approval hearing, the court must make and enter judgment." Because the settlement was approved on March 1, 2011, judgment should now be entered.

Attached hereto is a complete copy of the Proposed Final Judgment. Exhibit 1 to the accompanying Final Judgment is a list of all persons who excluded themselves from the Willis Class, which we obtained from Defendant Los Angeles County Waterworks District 40. Paragraph 7 of the Final Judgment requires that such a list be attached to make clear the persons who are not bound by the terms of the Settlement.

Wherefore, Plaintiff Willis requests that the Court promptly enter the Proposed Final Judgment agreed upon by the parties and submitted herewith.

Dated: April 26, 2011

KRAUSE KALFAYAN BENINK & SLAVENS LLP

/s/Ralph B. Kalfayan

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