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5 Attorneys for Plaintiff  
6 Rebecca Lee Willis and the Willis Class

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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**

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

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

) **DECLARATION OF GREGORY L.**  
) **JAMES IN SUPPORT OF MOTION**  
) **FOR A SUPPLEMENTAL AWARD OF**  
) **ATTORNEYS' FEES**  
)

16 Plaintiff,

17 vs.

) **Date: August 25, 2011**  
) **Time: 10:00 a.m.**  
) **Location: Central Civil West, 15<sup>th</sup> Floor**  
) **Room: 1515**  
) **Judge: Hon. Jack Komar**  
)

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

24 Defendants.

25  
26 I, GREGORY L. JAMES, declare:

27 1. The facts set forth in this declaration are based on my personal knowledge and if called as  
28 a witness, I could and would competently testify thereto under oath. As to those matters that

1 reflect and opinion, they reflect my personal opinion and judgment upon the matter. This  
2 Declaration is made in Support of the Plaintiff's Motion for a Supplemental Award of Attorneys'  
3 Fees.

4 2. Since April 4, 2008, I have served as consulting attorney, primarily on water law issues  
5 involved in this litigation, to Krause, Kalfayan, Benink & Slavens LLP, attorney for Plaintiff  
6 Class.

7 3. I am an attorney admitted to practice before all courts of the State of California, the  
8 United States Supreme Court, the Ninth Circuit Court of Appeals, the Federal District Court for  
9 the Central District of California, the Federal District Court for the Eastern District of California  
10 and the Federal District Court for the Southern District of California.

11 4. My office is located in Crowley Lake, California where my practice includes  
12 representation of public agencies, individuals and organizations.

13 5. I am a 1972 graduate of the University of California, Los Angeles School of Law.

14 6. Since 1977, a large part of my practice has been devoted to water rights and water  
15 resources law.

16 7. While I have been involved in a number of activities in this litigation, including factual  
17 and legal investigations, document preparation, discovery issues and communications with  
18 counsel, the vast majority of my time was expended on water law issues.

19 8. The summary attached hereto as Exhibits 6 to the NOL is a detailed account of the  
20 amount of time spent by me on this litigation. The account is based upon time summaries taken  
21 from daily time sheets that I have maintained from January 24, 2011 to May 12, 2011. Time  
22 expended on this litigation was tracked in increments of one-tenth of an hour. Based upon the  
23 information contained in the daily time summaries, I have spent 67.20 hours on this litigation.

24 9. Krause, Kalfayan, Benink & Slavens' ability to recover the reasonable value of their  
25 services is contingent upon this Court awarding a fully compensatory fee award based upon their  
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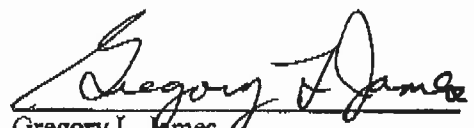
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Motion for an Award of Attorney's Fees. Consequently, the financial arrangements between me and Krause, Kalfayan, Benink & Slavens are primarily contingent. In accepting work in this litigation, I understood that Krause, Kalfayan, Benink & Slavens had limited financial resources to pay the costs and fees associated with this litigation. Krause, Kalfayan, Benink & Slavens' ability to pay the reasonable market value of my services is contingent upon this Court awarding a fully compensatory fee award based upon Plaintiff's Motion for an Award of Attorney's Fees.

10. I was aware that, due to Krause, Kalfayan, Benink & Slavens' limited ability to pay, the only way that I would be fairly compensated for my work on this litigation was to achieve a successful result in the litigation that conferred a substantial public benefit. Thus, I recognized in accepting work on this litigation that there was a risk of sustaining financial losses in the Plaintiff Class did not prevail. Despite the risk involved in accepting work on this litigation, I decided to accept the work because of the public interest nature of the litigation and the importance of the issues in the litigation.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct in all respects and that if called as a witness, I could and would competently testify thereto.

Executed this 12<sup>th</sup> day of July 2011 at Crowley Lake, California.

  
Gregory L. James