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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

**ANTELOPE VALLEY
GROUNDWATER CASES**

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

Plaintiff,

v.

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

Defendants.

RELATED CASE TO JUDICIAL COUNCIL
COORDINATION PROCEEDING NO. 4408

The Honorable Jack Komar
Coordination Trial Judge

**DECLARATION OF THE ARCHDIOCESE OF
LOS ANGELES IN SUPPORT OF MOTION
TO SUBSTITUTE LEAD PLAINTIFF**

I, Michael T. Davitt, declare as follows:

1 1. I am employed as Director of Real Estate for the Archdiocese of Los Angeles (the
2 "Archdiocese"). The Archdiocese of Los Angeles is a member of the Willis Class as defined in
3 the judgment dated September 22, 2011. I submit this declaration in support of Plaintiff's Motion
4 for Substitution the lead plaintiff. I am over 18 years old and make this statement based on my
5 own personal knowledge. If called up on as a witness to testify to the truth of the matters
6 contained in this declaration I would and could competently do so.
7

8 2. The Archdiocese owns the following ten pieces of property in the Antelope Valley Basin:
9 1) Parcel No. 3089-009-013 (79.73 acres); 2) Parcel No. 3113-006-098 (10.05 acres); 3) Parcel
10 No. 3203-010-003 (19.56 acres); 4) Parcel No. 3204-007-020 (19.49 acres); 5) Parcel No. 3204-
11 007-022 (9.88 acres); 6) Parcel No. 3204-007-029 (27.52 acres); 7) Parcel No. 3279-016-024
12 (17.13 acres); 8) Parcel No. 3318-009-087 (10.19 acres); 9) Parcel No. 3318-009-094 (7.63
13 acres); and 10) Parcel No. 3336-008-001 (18.54 acres). To the best of my knowledge none of the
14 parcels have a well to pump groundwater nor was there ever any pumping of groundwater from
15 those properties. The Archdiocese does have plans to develop some of these parcels in the near
16 future and those development needs will require the installation of a well for the pumping of
17 groundwater. It is the plan of the Archdiocese to develop those properties within the next two
18 years for various needs of the church including a cemetery. In connection with the use, the
19 Archdiocese plans to install a well and pump groundwater for reasonable and beneficial use.
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22 3. It is my understanding that Rebecca Lee Willis has sold her property in the Antelope
23 Valley and has asked to withdraw as a plaintiff class representative. The Archdiocese has agreed
24 to serve as a named class representative in place and stead of Rebecca Lee Willis for the purpose
25 of enforcing the Willis class judgment. I understand the requirements of serving as a class
26 representative and voluntarily undertake the burdens associated with the role of class
27 representative.
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I certify and declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on October 2, 2014 at _Los Angeles, California.



Michael T. Davitt
Director of Real Estate
Archdiocese of Los Angeles