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9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 FOR THE COUNTY OF LOS ANGELES

11 **ANTELOPE VALLEY**  
12 **GROUNDWATER CASES**

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

16 *Plaintiff,*

17 v.

18 LOS ANGELES COUNTY  
19 WATERWORKS DISTRICT NO. 40;  
20 CITY OF LANCASTER; CITY OF  
21 PALMDALE; PALMDALE WATER  
22 DISTRICT; LITTLEROCK CREEK  
23 IRRIGATION DISTRICT; PALM  
24 RANCH IRRIGATION DISTRICT;  
25 QUARTZ HILL WATER DISTRICT;  
26 ANTELOPE VALLEY WATER CO.;  
27 ROSAMOND COMMUNITY SERVICE  
28 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 DAVID ESTRADA IN  
SUPPORT OF MOTION TO SUBSTITUTE  
LEAD PLAINTIFF**

I, David Estrada, declare as follows:

1 1. I am a member of the Willis Certified Class. I submit this declaration in support of  
2 Plaintiff's Motion for Substitution the Lead Plaintiff. I am over 18 years old and make this  
3 statement based on my own personal knowledge. If called up on as a witness to testify to the truth  
4 of the matters contained in this declaration I would and could competently do so.

5  
6 2. I own property in the Antelope Valley and within the area of adjudication. I have an  
7 ownership interest in the following five parcels of land located in the Antelope Valley: 1) Parcel  
8 #3318-001-001-13 (80 acres); 2) Parcel #3318-001-002-13 (80 acres); 3) Parcel #3318-002-001-  
9 13 (160 acres); 4) Parcel #3318-006-013-13 (80 acres); and 5) Parcel #3318-006-014-13 (80  
10 acres). I do not currently pump water from the basin nor have I ever pumped water from the  
11 basin in the past. No water has ever been pumped from the basin from any of the five listed  
12 properties. However, I plan to install a well and pump groundwater in the future and I wish to  
13 preserve my rights to pump groundwater in the future free of replacement assessment.

14  
15 3. It is my understanding that the lead plaintiff Rebecca Lee Willis has sold her property in  
16 the Antelope Valley. I have retained the law firm of Krause Kalfayan Benink & Slavens, LLP to  
17 represent me in this action and have agreed to serve as one of the lead plaintiffs and class  
18 representatives. I understand the requirements of serving as a class representative and voluntarily  
19 undertake the burdens associated with the role of class representative.

20  
21 I certify and declare under penalty of perjury under the laws of the State of California that  
22 the foregoing is true and correct.

23  
24 Executed on September 21, 2014 at PICO RIVERA, California.

25  
26 

27 David Estrada