

1 Ralph B. Kalfayan (SBN 133464)
Lynne M. Brennan (SBN 149131)
2 KRAUSE KALFAYAN BENINK &
SLAVENS, LLP
3 550 West C Street, Suite 530
San Diego, CA 92101
4 Tel: (619) 232-0331
Fax: (619) 232-4019

5 Attorney for the Willis Class
6
7

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF LOS ANGELES
10

11 ANTELOPE VALLEY
12 GROUNDWATER CASES

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

16 *Plaintiffs,*

17 v.

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

26 *Defendants.*
27
28

RELATED CASE TO JUDICIAL COUNCIL
COORDINATION PROCEEDING NO. 4408

DECLARATION OF LYNNE M. BRENNAN IN
SUPPORT OF WILLIS CLASS' *EX PARTE*
APPLICATION FOR ORDER MODIFYING
CASE MANAGEMENT ORDER

Date: January 22, 2015

Time: 11:00 am

Place: Santa Clara County Superior Court,
191 N. 1st St., San Jose, CA 95113, Dept. 1

Judge: Hon. Judge Komar

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

I, Lynne M. Brennan, declare:

1. I have personal knowledge of the facts below, and if called upon to do so, I could and would testify competently thereto in a court of law.

2. I am an attorney licensed to practice law in the State of California. I am Of Counsel to law firm of Krause, Kalfayan, Benink & Slavens, LLP, Class Counsel and attorneys of record for the Willis Class.

3. Attached as Exhibit A to the Willis Class' *Ex Parte* Application for Order Modifying Case Management Order (hereinafter "Willis Class' *Ex Parte* Application") is a true and correct copy of the Bolthouse Farms' Addendum to Objection to Motion for Preliminary Approval of Class Settlement Filed by Richard Wood and District 40, of which I have highlighted relevant portions.

4. Attached as Exhibit B to the Willis Class' *Ex Parte* Application is a true and correct copy of Bolthouse Farms' Addendum to Objection to Motion for Preliminary Approval of Class Settlement Filed by Richard Wood and District 40 dated May 23, 2011, of which I have highlighted relevant portions.

5. Attached as Exhibit C to the Willis Class' *Ex Parte* Application is a true and correct copy of the Court's Order Transferring and Consolidating Actions for All Purposes, filed Feb. 24, 2010, of which I have highlighted relevant portions.

6. Attached as Exhibit D to the Willis Class' *Ex Parte* Application is a true and correct copy of Hearing Transcript dated 8/20/07, of which I have highlighted relevant portions.

7. Attached as Exhibit E to the Willis Class' *Ex Parte* Application is a true and correct copy of (redacted) Letter from Ralph B. Kalfayan to Counsel for PWS dated December 3, 2014.

1 8. Attached as Exhibit F to the Willis Class' *Ex Parte* Application is a true and correct copy
2 of Small Pumper Class' Case Management Conference Statement dated November 10, 2011, of
3 which I have highlighted relevant portions.
4

5 9. Attached as Exhibit G to the Willis Class' *Ex Parte* Application is a true and correct copy
6 of Small Pumper Class' Case Management Conference Statement dated October 5, 2011, of which
7 I have highlighted relevant portions.

8 10. Attached as Exhibit H to the Willis Class' *Ex Parte* Application is a true and correct
9 copy of Public Water Suppliers' Case Management Statement dated October 11, 2011, of which I
10 have highlighted relevant portions.
11

12 I certify and declare under penalty of perjury under the laws of the State of California that
13 the foregoing is true and correct.
14

15 Executed on January 20, 2015 at San Diego, California.

16
17 By: 

18 Lynne M. Brennan
19
20
21
22
23
24
25
26
27
28