

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 Attorneys 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, on behalf of  
herself and all others similarly situated,

15 *Plaintiff,*

16 v.

17  
18 LOS ANGELES COUNTY  
WATERWORKS DISTRICT NO. 40;  
19 CITY OF LANCASTER; CITY OF  
PALMDALE; PALMDALE WATER  
20 DISTRICT; LITTLEROCK CREEK  
IRRIGATION DISTRICT; PALM  
21 RANCH IRRIGATION DISTRICT;  
QUARTZ HILL WATER DISTRICT;  
22 ANTELOPE VALLEY WATER CO.;  
23 ROSAMOND COMMUNITY SERVICE  
DISTRICT; PHELAN PINON HILL  
24 COMMUNITY SERVICE DISTRICT; and  
DOES 1 through 1,000;

25 *Defendants.*  
26  
27  
28

RELATED CASE TO JUDICIAL COUNCIL  
COORDINATION PROCEEDING NO. 4408

The Honorable Jack Komar  
Coordination Trial Judge

**DECLARATION OF RALPH B. KALFAYAN  
IN SUPPORT OF WILLIS CLASS' MOTION  
TO OBTAIN COURT ORDER PERMITTING  
CLASS COUNSEL TO SEEK ADDITIONAL  
ATTORNEYS FEES**

Date: March 26, 2015

Time: 10:00 a.m.

Place: Superior Court of California,  
County of Los Angeles  
111 North Hill Street, Room 222  
Los Angeles, Ca 90012

1 I, Ralph B. Kalfayan, declare:

2  
3 1. I have personal knowledge of the facts below, and if called upon to do so, I could  
4 and would testify competently thereto in a court of law.

5  
6 2. I am an attorney licensed to practice law in the State of California. I am a named  
7 partner at the law firm of Krause, Kalfayan, Benink & Slavens, LLP, Class Counsel and attorney  
8 of record for the Willis Class.

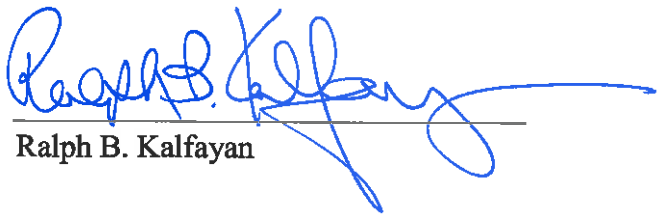
9  
10 3. Attached as Exhibit A to the Willis Class' Motion to Obtain Court Order  
11 Permitting Willis Class Counsel to Seek Additional Attorneys fees is a true and correct copy of  
12 the Willis Class Stipulation of Settlement dated July 13, 2010.

13  
14 4. Attached as Exhibit B to the Willis Class' Motion to Obtain Court Order  
15 Permitting Willis Class Counsel to Seek Additional Attorneys fees is a true and correct copy of  
16 the Order After Hearing on Motion by Plaintiff Rebecca Lee Willis and the Class For Attorneys'  
17 Fees, Reimbursement of Expenses and Class Representative Incentive Award dated May 4, 2011.

18 I declare under penalty of perjury under the laws of the State of California that the  
19 foregoing is true and correct.

20 Executed on March 4, 2015 at San Diego, California.

21  
22  
23  
24  
25  
26  
27  
28

By:   
Ralph B. Kalfayan