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

11 ANTELOPE VALLEY GROUNDWATER  
12 CASES

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

17 *Plaintiffs,*

18 v.

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

*Defendants.*

RELATED CASE TO JUDICIAL COUNCIL  
COORDINATION PROCEEDING NO. 4408

**WILLIS CLASS' SUPPLEMENTAL  
OBJECTIONS TO PROPOSED  
STATEMENT OF DECISION AND  
PROPOSED JUDGMENT**

Date: December 23, 2015

Time: 10:00 am

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

Judge: Hon. Jack Komar

1           The Willis Class respectfully submits these supplemental objections to the Proposed  
2 Statement of Decision and Proposed Judgments in order to make clear that all the points and  
3 authorities raised in its Objections to the Proposed Statement of Decision and the Proposed  
4 Judgment (“Objections”), filed on December 14, 2015, apply equally to the three proposed  
5 judgments advanced by the Stipulating Parties on or about December 4, 2015. The three judgments  
6 proposed by the Stipulating parties are: (1) a “(Proposed) Judgment” that appears to be a master  
7 judgment; (2) a “[proposed] Judgment Approving Small Pumper Class Action Settlements”; and,  
8 (3) a [Proposed] Judgment and Physical Solution. These three judgments are related and duplicate  
9 language contained in the Proposed Statement of Decision. The Willis Class’ Opposition applies  
10 equally to the three proposed judgments in addition to the separate proposed Statement of Decision.  
11 For example, in both the Proposed Statement of Decision and the master Proposed Judgment. (See  
12 page 1 lines 10-13 in the master Proposed Judgment and page 20, lines 22-27 of the Proposed  
13 Statement of Decision), it is stated that the Court adopted the Proposed Judgment as its own  
14 physical solution. The Willis Class’ objections to this statement apply universally to the Proposed  
15 Statement of Decision and the three Proposed Judgments.<sup>1</sup>

18           Three other objections are also noteworthy to ensure a clear record. First, page 3, line 19 of  
19 the master Proposed Judgment states: “All real property owned by the parties within the Basin is  
20 subject to this Judgment.” This statement is objectionable to the extent it proposes to change the  
21 adjudication from an *in personam* action to an *in rem* action. The Court has wrestled with this issue  
22 several times over the course of the adjudication and its rulings have been consistent- this action is  
23 an *in personam* action not an *in rem* action.  
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27           <sup>1</sup> California Rules of Court Rule 3.1590(g) provides a party with fifteen days to object. The Court’s minute  
28 Order of November 10, 2015 allotted only 10 days to oppose the Statement of Decision and Proposed Judgment. The  
Willis Class is not aware of any party requesting a shortening of the 15 day time period to object nor is the Class  
conceding a shortened time period.

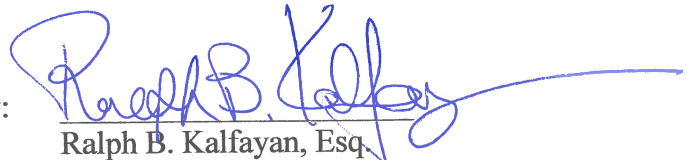
1 Second, page 3 line 2 of the proposed Judgment Approving Small Pumper Class Action  
2 Settlements states: "No class member timely filed an objection to the 2015 Settlement." This  
3 statement is factually incorrect. The Court indicated on August 25, 2015, the hearing on the Willis  
4 Class Motion to Withdraw Based on Conflict that a landowner who owns multiple parcels may be  
5 in both the Willis and the Wood Class, i.e. the two classes (Wood and Willis) overlap. It is  
6 undisputed that there are thousands of dual class members "2400 out of his 3400 Small Pumper  
7 clients also own parcels of land on which they have never pumped." (See Reply Brief in support of  
8 Motion to Withdraw Based on Conflict of Interest dated August 18, 2015; Docket # 10323). On  
9 behalf of all Willis Class members, dual or not, objections were made to the 2015 Settlement.  
10

11 Finally, the Willis Class further objects to the potential entry of default against any member  
12 of the Willis Class. The Willis Class is not currently aware of any defaults entered against a  
13 member of the Willis Class, but notes that Best, Best, & Krieger, LLP as claims administrator,  
14 maintains the Willis Class list and is also a Stipulating Party. Best, Best & Krieger, LLP is in the  
15 best position to ensure that no default is entered against any Willis Class member and indeed has a  
16 responsibility to ensure that no such default is entered.  
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18 Respectfully submitted,  
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22 Dated: December 21, 2015

KRAUSE KALFAYAN BENINK & SLAVENS, LLP

23  
24 By:   
25 Ralph B. Kalfayan, Esq.  
26 Class Counsel for the Willis Class  
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