

1 Ralph B. Kalfayan (SBN 133464)
2 Phillip E. Stephan (SBN 283818)
3 KRAUSE KALFAYAN BENINK &
4 SLAVENS, LLP
5 550 West C Street, Suite 530
6 San Diego, CA 92101
7 Tel: (619) 232-0331
8 Fax: (619) 232-4019

9 Class Counsel for the Willis Class

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

12 **ANTELOPE VALLEY GROUNDWATER
13 CASES**

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

18 *Plaintiffs,*

19 v.

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

Defendants.

RELATED CASE TO JUDICIAL COUNCIL
COORDINATION PROCEEDING NO. 4408

Case No. BC 364553

**DECLARATION OF CINDY BARBA IN
SUPPORT OF WILLIS CLASS' SECOND
SUPPLEMENTAL MOTION FOR AN
AWARD OF ATTORNEYS' FEES,
REIMBURSEMENT OF EXPENSES, AND
CLASS REPRESENTATIVE INCENTIVE
AWARD**

Date: March 21, 2016

Time: 1:30 P.M.

Place: San Jose Superior Court
191 North First Street
San Jose, CA 95113

Judge: Hon. Jack Komar

I, Cindy Barba, state as follows:

1. I am an administrative assistant with the law firm Krause, Kalfayan, Benink and Slavens, LLP (hereinafter KKBS) counsel of record for the Willis Class in this action. I submit this declaration in support of the application for reimbursement of expenses.

2. I have been an administrative assistant with KKBS since March 2015. My responsibilities at the firm include reviewing invoices, allocating expenses to cases, issuing checks to vendors, reconciling bank accounts, and reviewing accounts payable.

3. I have compiled and reviewed all expenses incurred on this case from January 1, 2012 to December 31, 2015. The firm maintains invoices and records to support each cost item. I am the custodian of those records.

4. The following is a Summary Schedule of Expenses incurred related to this case. Attached to this Motion as Exhibit 13 to the NOL is a copy of the summary schedule and all related supporting invoices.

SUMMARY SCHEDULE OF EXPENSES

Exhibit 13 to NOL	Expert Costs:	
	Stratecon, Inc. – Dr. Rod Smith	\$38,052.07
	Jones, Roach & Caringella – Dr. Stephen Roach	\$17,743.30
	Subtotal	\$55,795.37

Exhibit 13 to NOL	Witness Costs:	
	Tim Thompson	\$1,134.38
	Beeby Engineering	\$468.75
	Robert Wagner	\$1,092.75
	Charles Binder	\$1,000.00
	Dennis Williams	\$2,072.00
	Subtotal	\$5,767.88

Exhibit 13 to NOL	Filing Costs:	
	Superior Court filing fees (Glotrans)	\$3,436.00
	CourtCall filing fees	\$2,836.00
	Subtotal	\$6,272.00

Exhibit 13 to NOL	Reporters Costs:	
	Subtotal	\$10,397.82

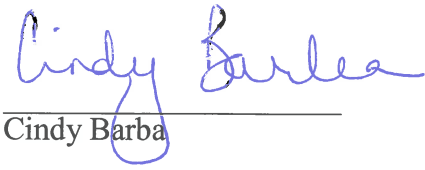
Exhibit 13 to NOL	UPS, Fed Ex and Courier Costs:	
	Subtotal	\$2,253.10

Exhibit 13 to NOL	Travel:	
	Hotel	\$15,141.54
	Air	\$5,199.70
	Train	\$966.00
	Other transportation (Uber, Taxi, or Mileage)	\$3,314.21
	Subtotal	\$24,621.45

Total Costs: \$105,107.62

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 declare under penalty of perjury under the laws of the California that the foregoing is true and correct. This declaration is executed on January 22nd, 2016 at San Diego, California.


Cindy Barba