



**Law Office of Greg James  
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January 4, 2016

Krause, Kalfayan, Benick & Slavins  
550 W. C Street, Suite 530  
San Diego, CA 92101  
Attention: Ralph B. Kalfayan, Esq

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Summary of Legal/Consulting Services Rendered by Greg James from January  
1, 2014 to December 31, 2015

Antelope Valley Groundwater Adjudication

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Professional Services

<u>Date</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/14/14	Telephone call with R. Kalfayan re letter requesting response to interrogatories concerning return flows to AV	0.50	450	225.00
04/22/14	Meeting with R. Kalfayan re potential settlement of the AV groundwater adjudication	1.00	450	450.00
05/25/14	Review proposed Stipulation for Interlocutory Judgement and Physical Solution	2.50	450	1,125.00
05/26/14	Draft comments on the draft Stipulation for Interlocutory Judgement and Physical Solution and email comments to R. Kalfayan	1.50	450	675.00
05/28/14	Telephone call w/ R. Kalfayan re draft Stipulation for Interlocutory Judgment and Physical Solution	0.40	450	180.00
07/10/14	Review and revise draft letter to W. Wellen and email suggested revision to R. Kalfayan	1.50	450	675.00
08/10/14	Travel time from Bishop to Los Angeles to Bishop to attend Antelope Valley GW Adjudication trial management conference and negotiations with attorneys for Waterworks District 40.	10.00	50	500.00
11/03/14	Travel time from Bishop to LA to attend AV adjudication case management conference	5.00	50	250.00
11/04/14	Attend AV Adjudication Case Management Conference	2.00	450	900.00
11/04/14	Participate in discussion of settlement of the Willis Class issues with the proposed stipulation and physical solution in the AV Adjudication with representatives of AVEK	1.20	450	540.00

<u>Date</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/04/14	Travel time from LA to Bishop following AV Adjudication Case Management Hearing	5.00	50	250.00
11/04/14	Meeting w/ Ralph Kalfayan prior to AV Adjudication Case Management Conference	1.00	450	450.00
12/10/14	Telephone call with R. Kalfayan re proposed AV physical solution	1.00	450	450.00
01/04/15	Review draft CMS and letters from Rodney Smith and email comments on the CMS to R. Kalfayan	2.10	450	945.00
01/19/15	Review revised CMA filed by Wood Class, review draft opposition to revised CMA and email comments on the draft opposition to R. Kalfayan	0.80	450	360.00
02/04/15	Research cases in preparation for drafting opposition to the proposed physical solution in the Antelope Valley adjudication and discuss opposition with R. Kalfayan	3.10	450	1,395.00
03/05/15	Review filings in AV case re approval of proposed Woods Class settlement and basinwide physical solution	2.10	450	945.00
03/08/15	Review draft of opposition to the proposed Woods Class settlement and discuss opposition with R. Kalfayan	2.30	450	1,035.00
03/11/15	Revise opposition to motion for preliminary approval of the Woods Class settlement and email suggested revisions to R. Kalfayan	5.90	450	2,655.00
03/12/15	Continue revision of opposition to Wood Class' motion for preliminary approval of settlement agreement and email suggested revisions to R. Kalfayan	5.30	450	2,385.00
03/12/15	Review "almost final" opposition to Wood Class motion for preliminary approval and email comments to R. Kalfayan	2.10	450	945.00
03/13/15	Review "final" opposition brief to Wood Class motion and email comments to R. Kalfayan	1.20	450	540.00
03/18/15	Review reply to opposition to attorneys fees motion and the CMS and email suggested revisions to R. Kalfayan	1.30	450	585.00
03/19/15	Review draft reply brief to PWS opposition brief to motion for appointment of expert witness and email revisions to R. Kalfayan	1.90	450	855.00
03/25/15	Meeting w/ R. Kalfayan in advance of hearing on proposed physical solution and Wood Class settlement	1.50	450	675.00
03/25/15	Travel time from Bishop to Los Angeles to Bishop to attend hearing re AV physical solution and Wood Class settlement	10.00	50	500.00
03/26/15	Review pleadings in preparation for hearing and attend hearing on proposed physical solution and Wood Class	3.00	450	1,350.00

<u>Date</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/31/15	settlement Telephone call w/ R. Kalfayan re AV case and opposition to the SPPS	0.30	450	135.00
04/05/15	Review documents to be filed re opposition to proposed physical solution in the AV case, email comments to R. Kalfayan, and exchange emails re documents with R. Kalfayan and L. Brennan.	3.10	450	1,395.00
04/12/15	Research cases applicable to AV GW adjudication and discuss motion to enforce Willis Class judgment with R. Kalfayan	1.50	450	675.00
04/22/15	Research provisions of the Willis Settlement and the Willis Judgment re right of Class to bring a separate action regarding inconsistency of proposed physical solution with Willis Settlement and discuss with R. Kalfayan	2.50	450	1,125.00
05/07/15	Draft proposed settlement proposal from Willis Class, email to R. Kalfayan and discuss with R. Kalfayan	2.50	450	1,125.00
05/20/15	Review emails from R. Kalfayan re SPPS, review and revise draft motion to enforce the Willis Judgement and email revisions to R. Kalfayan, discuss motion with R. Kalfayan	3.30	450	1,485.00
05/28/15	Locate Peter Kavounas on Google and draft and send email to P. Kavounas re serving as an expert witness in the AV litigation	0.50	450	225.00
06/14/15	Travel time from Bishop to San Jose to Bishop to attend hearing on Willis Class motions	11.50	50	575.00
06/15/15	Attend hearing on Willis Class motions in San Jose	2.00	450	900.00
06/17/15	Draft summary of notes of Judge Komar's remarks during his rulings on the Willis Class motions on June 15 and email summary to R. Kalfayan along with suggestions on how to proceed in the litigation	0.80	450	360.00
06/18/15	Telephone call w/ R. Kalfayan and L. Benner re how to proceed on behalf of the Willis Class in the AV hearing.	1.30	450	585.00
06/19/15	Review documents recently filed in the AV case and participate in telephone call w/ R. Kalfayan and L. Brennan with regard to how to proceed in the case.	1.30	450	585.00
07/09/15	Review draft motion in the AV case and email suggestions to R. Kalfayan	1.00	450	450.00
07/12/15	Telephone call with R. Kalfayan re proceeding in the AV case	0.70	450	315.00
07/22/15	Review documents in preparation for Aug 3 and 4 AV hearings	1.50	450	675.00
07/26/15	Review opposition to motion to enforce filed by the	1.50	450	675.00

<u>Date</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/28/15	PWS Telephone call with R. Kalfayan re drafting of responses to opposition by PWS to second motion to enforce the Willis Settlement	0.50	450	225.00
08/03/15	Meetings with R. Kalfayan and L. Brennan re AV GW Adjudication, meeting with reps of AVEK re potential settlement of Willis claims in AV GW Adjudication, attend Court hearing on Willis motions in AV GW Adjudication	10.00	450	4,500.00
08/04/15	Meetings with R. Kalfayan and L. Brennan re Willis Class motions in AV GW Adjudication and attend Court hearing re Willis Class motion to enforce Willis Settlement	3.20	450	1,440.00
08/04/15	Travel time from LA to Bishop following meetings and Court hearings in AV GW Adjudication	5.00	50	250.00
08/09/15	Develop ideas for potential settlement involving the Willis Class in the AV GW Adjudication and draft and send email to R. Kalfayan and L. Brenna re settlement ideas	2.10	450	945.00
08/11/15	Telephone call with R. Kalfayan and L. Brennan re settlement options in the AV GW adjudication and dratt and send email ro R. Kalfayan and L. Brennan with ideas on settlement options	2.50	450	1,125.00
08/11/15	Research on AV GW Adjudication settlement options, emails and telephone calls to R. Kalfayan and L. Brennan re settlement options	3.70	450	1,665.00
08/12/15	Telephone call with Lynne Brennan re settlement options in the AV GW adjudication	1.00	450	450.00
08/17/15	Telephone call with L. Brennan re potential Willis Class settlement in AV groundwater litigation	0.40	450	180.00
08/25/15	Attend hearing on Willis Class motion to withdraw via Court Call	1.50	450	675.00
08/27/15	Draft email to R. Kalfayan with thoughts on how the Willis Class should proceed in the AV adjudication and discussion with R. Kalfayan and Lynne Brennan on how the Class should proceed.	1.70	450	765.00
09/01/15	Review proposed order ruling on Willis Class' motion to the withdraw and email comments to R. Kalfayan	0.50	450	225.00
09/04/15	Telephone call w/ R. Kalfayan and L. Brennan re responses to case management statements in AV and re proceeding in upcoming AV trial	0.70	450	315.00
09/08/15	Review proposed allocation to Willis Class and telephone call with R. Kalfayan	0.70	450	315.00
09/10/15	Re-review proposed allocation to Willis Class and	1.20	450	540.00

<u>Date</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
	review section 8.4 of the SPPS and email thoughts to R. Kalfayan			
09/20/15	Review revised SPPS prepared by R. Kalfayan, review Willis settlement with PWS and email suggested revisions and question regarding the revised SPPS to R. Kalfayan	4.10	450	1,845.00
09/25/15	Review District 40 trial brief and Willis trial brief and discuss with R. Kalfayan	2.50	450	1,125.00
09/25/15	Review outline of potential settlement with Willis Class and discuss with R. Kalfayan	1.30	450	585.00
09/26/15	Telephone call w/ R. Kalfayan and Lynne Brenner re AV settlement, revise settlement terms and email to R. Kalfayan and L. Brenner	3.50	450	1,575.00
09/27/15	Revise Willis Class settlement agreement	2.00	450	900.00
09/27/15	Travel time from Bishop to LA to participate in AV Phase 6 Trial	5.00	50	250.00
09/28/15	Attend 6 trial and settlement discussions re Willis Class	6.00	450	2,700.00
09/28/15	Meeting w/ R. Kalfayan and L. Brennan re Phase 6 trial and Willis Class settlement	2.00	450	900.00
09/29/15	Attend Phase 6 Trial and participate in settlement discussions	6.00	450	2,700.00
09/29/15	Meeting with R. Kalfayan and L. Brennan re Phase 6 trial and Willis Settlement	2.00	450	900.00
09/30/15	Attend Phase 6 trial and participate in settlement discussions	6.00	450	2,700.00
09/30/15	Meeting w/ R. Kalfayan and L. Brennan re Phase 6 trial and Willis Settlement	1.50	450	675.00
10/01/15	Attend Phase 6 trial and participate in settlement discussions	2.50	450	1,125.00
10/01/15	Revise physical solution to include potential Willis Class settlement and discuss with R. Kalfayan and L. Brennan	6.10	450	2,745.00
10/02/15	Phase 6 trial and participate in settlement discussions.	3.00	450	1,350.00
10/02/15	Travel time from LA to Bishop following adjournment of Phase 6 trial	5.00	50	250.00
10/03/15	Revise potential Willis Class settlement in accordance with discussions with R. Kalfayan and L. Brenna and email potential settlement to attorneys for AVEK and the Wood Class	2.00	450	900.00
10/05/15	Telephone call w/ R. Kalfayan and L. Brennan re SPPS's provisions for the export of water from the AV adjudication area	0.50	450	225.00
10/06/15	Telephone call w/ R. Kalfayan re AV Phase 6 trial	0.50	450	225.00

<u>Date</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/08/15	Telephone calls with L. Brennan re Willis settlement in AV case and participate via teleconference in settlement meeting	1.50	450	675.00
10/11/15	Revise potential settlement terms re Willis Class following settlement discussions	1.90	450	855.00
10/12/15	Revise potential Willis Class settlement terms, add provisions to SPPS pertaining to future reasonable and beneficial use determinations and email document to R. Kalfayan and L. Brennan	1.40	450	630.00
10/13/15	Travel time from Bishop to LA to attend AV Phase 6 trial	5.00	50	250.00
10/14/15	Attend Phase 6 AV trial and meet with R. Kalfayan and L. Brennan	5.00	450	2,250.00
10/15/15	Attend Phase 6 AV trial and meetings with R. Kalfayan and L. Brennan	5.50	450	2,475.00
10/15/15	Travel time from LA to Bishop following attendance at Phase 6 AV trial	5.00	50	250.00
10/27/15	Research in preparation for closing argument in the AV case and review draft of modified SPPS	3.90	450	1,755.00
10/29/15	Re-review draft of modified SPPS	1.10	450	495.00
11/01/15	Review and revise prescription brief	1.50	450	675.00
11/02/15	Research and draft final argument re legality of SPPS	5.30	450	2,385.00
11/03/15	Travel time from Bishop to San Jose for AV final argument	7.50	50	375.00
11/03/15	Attend final argument in AV case	2.00	450	900.00
11/03/15	Meetings with R. Kalfayan and L. Brennan re AV final arguments, review and revise final argument	4.50	450	2,025.00
11/04/15	Finalize final argument in AV case	2.00	450	900.00
11/04/15	Attend final arguments in AV case and present final argument re legality of SPPS	6.00	450	2,700.00
11/04/15	Travel time on 11-4-15 and 11-5-15 from San Jose to Bishop following AV trial	7.50	50	375.00
11/10/15	Review CCP and Rules of Court re need to file request for statement of decision and email results to R. Kalfayan	0.50	450	225.00
11/18/15	Draft summary of potential issues in the AV adjudication for appeal and email summary to R. Kalfayan	1.50	450	675.00
12/07/15	Download proposed statement of decision and related documents from the Superior Court website and begin review of the documents	1.00	450	450.00
12/08/15	Review proposed statement of decision in the AV groundwater adjudication	1.20	450	540.00
12/09/15	Begin drafting Objections to Proposed Statement of	4.90	450	2,205.00

<u>Date</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/10/15	Decision in AV case Complete first draft of Objections to the Proposed Statement of Decision in AV and email first draft to R. Kalfayan	9.10	450	4,095.00
12/13/15	Review modified Objections to Statement of Decision and email revisions to R. Kalfayan	2.00	450	900.00
12/21/15	Review draft supplemental opposition to judgments in the AV case and email comments to R. Kalfayan	0.50	450	225.00
12/22/15	Review and revise objections to amended statement of decision and Power Point presentation and email revisions to Ralph Kalfayan	2.90	450	1,305.00
12/23/15	Participate in hearing on AV Statement of Decision and Final Judgment via Court Call	2.00	450	900.00
<u>Summary of Hours</u>				
	Greg James	298.90 hr		
	TOTAL: Professional Services	298.90		\$101,905.00

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Costs and Disbursements

<u>Date</u>	<u>Description</u>	<u>Amount</u>
11/05/14	Lodging and overnight parking cost in LA while attending AV Adjudication Trial Conference	326.05
11/05/14	Parking cost at courthouse while attending AV Adjudication Trial Conference	18.00
11/05/15	Lodging cost in Bakersfield during transit by car from San Jose to Bishop	<u>No Charge</u>
	TOTAL: Costs and Disbursements	\$ 344.05

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TOTAL: Fees and Costs \$102,249.05