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8 Class Counsel for the Willis Class

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

**SECOND DECLARATION OF RALPH B.
KALFAYAN IN SUPPORT OF SECOND
SUPPLEMENTAL MOTION FOR
ATTORNEYS FEES, COSTS AND
INCENTIVE AWARD**

Date: April 1, 2016
Time: 1:30 p.m.
Dept.: 1
Place: San Jose Superior Court
191 N. First Street
San Jose, CA 95113
Judge: Hon. Jack Komar

1 I, Ralph B. Kalfayan declare:

2 1. I am a partner at Krause, Kalfayan, Benink & Slavens, LLP and am Class Counsel
3 for the Willis Class. I have personal knowledge of the following facts contained in this declaration
4 and if called upon as a witness I can and will testify to the matters stated herein.

5 2. Attached as Exhibit 16 is a true and correct copy of the Willis Class Partial
6 Opposition to Proposed Case Management Order, docket #9428, dated October 29, 2014.

7 3. Attached as Exhibit 17 is a true and correct copy of the November 4, 2014 Reporter's
8 Transcript from the hearing on November 4, 2014.

9 4. Attached as Exhibit 18 is a true and correct copy of the Willis Class Notice and
10 Motion to Obtain Court Order Permitting Willis Class Counsel to Seek Additional Attorneys' Fees,
11 docket #9626, dated March 4, 2015.

12 5. Attached as Exhibit 19 is a true and correct copy of the Public Water Suppliers'
13 Opposition to Willis Class' Motion to Obtain Court Order Permitting Willis Class Counsel to Seek
14 Additional Attorneys' Fees, docket #9643, dated March 13, 2015.

15 6. Attached as Exhibit 20 is a true and correct copy of the Willis Class' Reply Brief in
16 Support of Motion to Obtain Court Order Permitting Class Counsel to Seek Additional Attorneys'
17 Fees, docket #9661, dated March 19, 2015.

18 7. Attached as Exhibit 21 is a true and correct copy of the March 26, 2015 Reporter's
19 Transcript from the hearing on March 26, 2015.

20 8. Attached as Exhibit 22 is a true and correct copy of the Minute Order, docket #9701,
21 dated March 26, 2015.

22 9. Attached as Exhibit 23 is a true and correct copy of the Willis Class' Motion to
23 Enforce Settlement Agreement with Defendant Public Water Supplier, docket #9949, dated May
24 21, 2015.

1 10. Attached as Exhibit 24 is a true and correct copy of the Public Water Suppliers'
2 Opposition to Willis Class' Motion to Enforce Settlement Agreement with Defendant Public Water
3 Suppliers, docket #9961, dated June 2, 2015.

4 11. Attached as Exhibit 25 is a true and correct copy of the Public Water Suppliers'
5 Case Management Conference Statement, docket #10010, dated June 12, 2015.

6 12. Attached as Exhibit 26 is a true and correct copy of the Minute Order, docket
7 #10031, dated June 15, 2015.

8 13. Attached as Exhibit 27 is a true and correct copy of the Public Water Suppliers'
9 Case Management Conference Statement, docket #10095, dated July 7, 2015.

10 14. Attached as Exhibit 28 is a true and correct copy of the Minute Order, docket
11 #10136, dated July 10, 2015.

12 15. Attached as Exhibit 29 is a true and correct copy of the Willis Class' Second Motion
13 to Enforce Settlement Agreement with Defendant Public Water Suppliers, docket #10172, dated
14 July 15, 2015.

15 16. Attached as Exhibit 30 is a true and correct copy of the 3rd Motion to Enforce / 2nd
16 re-noticed motion to enforce, docket #10390, dated September 3, 2015.

17 17. Attached as Exhibit 31 is a true and correct copy of the Joint Case Management
18 Conference Report, docket #10500, dated September 17, 2015.

19 18. Attached as Exhibit 32 is a true and correct copy of the 2nd Amended Final Willis
20 Judgment, docket #10972, dated September 29, 2015 nunc pro tunc September 22, 2011.

21 19. Attached as Exhibit 33 is a true and correct copy of the Exhibit A to December 2015
22 Judgment (SPPS).

23 20. Attached as Exhibit 34 is a true and correct copy of the Notice of Entry of Judgment
24 and December 2015 Judgment.

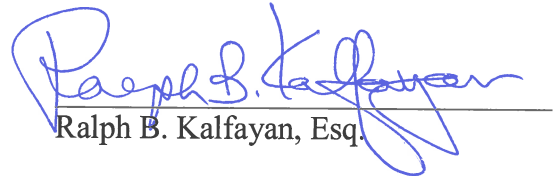
1 21. Attached as Exhibit 35 is a true and correct copy of the Minute Orders Setting Fees
2 and Costs Motion for Hearing, docket #11064 and #11198, dated January 8, 2016 and February 10,
3 2016.

4 I declare under penalty of perjury under the laws of the State of California that the above is true
5 and correct.

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7 Dated: March 25, 2016

Respectfully submitted,

8 KRAUSE, KALFAYAN, BENINK &
9 SLAVENS, LLP

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11 
12 Ralph B. Kalfayan, Esq.