

Ralph B. Kalfayan, SBN133464
David B. Zlotnick, SBN 195607
KRAUSE, KALFAYAN, BENINK
& SLAVENS LLP
625 Broadway, Suite 635
San Diego, CA 92101
Tel: (619) 232-0331
Fax: (619) 232-4019

Attorneys for Plaintiff and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

**ANTELOPE VALLEY
GROUNDWATER CASES**

Included Actions: Los Angeles County
Waterworks District No. 40 v. Diamond
Farming Co., Superior Court of California,
County of Los Angeles, No. BC 32520;

Los Angeles County Waterworks District No.
40 v. Diamond Farming Co., Superior Court of
California, County of Kern, Case No. S-1500-
CV-254-348;

We. Bolthouse Farms, Inc. V. City of
Lancaster; Diamond Farming Co. V. City of
Lancaster; Diamond Framing Co. V. Palmdale
Water District; Superior Court of California,
County of Riverside, Cases No. RBC 353 840,
RBC 344 436, RBC 344 668;

This Document Relates To:

REBECCA LEE WILLIS, on behalf of herself
and all others similarly situated, Plaintiff,

vs.

LOS ANGELES COUNTY WATERWORKS
DISTRICT NO. 40, et al; Defendants.

Case No. BC 364 553

JUDICIAL COUNCIL COORDINATION
PROCEEDING NO. 4408

Santa Clara Case No. 1-05-CV-049053
Honorable Jack Kolar, Presiding

**PETITION FOR COORDINATION OF
ADD-ON CASE**

Date: Not Set

Time: Not Set

Dept.: 17

Judge: Honorable Jack Kolar
Coordination Trial Judge

1 Pursuant to section 404.4 of the California Code of Civil Procedure and Rule 3.544 of the
2 California Rules of Court, Plaintiff and Petitioner, Rebecca Lee Willis, hereby requests that the
3 Honorable Jack Kolar, Coordination Trial Judge, grant this Petition for Coordination of Add-On
4 Case (the "Petition") and order that the action *Rebecca Lee Willis, on behalf of herself and all others*
5 *similarly situated, Plaintiff, vs. Los Angeles County Waterworks District No. 40, et al; Defendants,*
6 Case No. BC 364 553 (Los Angeles County Superior Court) ("*Willis*") be coordinated with the
7 *Antelope Valley Groundwater Cases*, J.C.C.P. No. 4408.


8 This Petition is brought on the grounds that *Willis* and the *Antelope Valley Groundwater*
9 *Cases* present common questions of fact and law and that coordination will therefore promote the
10 ends of justice, as required by California Code of Civil Procedure sections 404 and 404.1, as more
11 particularly set forth in the accompanying Memorandum of Points and Authorities and Declaration
12 of David B. Zlotnick in support of this Petition.

13 Pursuant to Rule 3.521, the names of the parties to the *Willis action* and the names of their
14 attorneys of record are set forth at paragraph 4 of the Zlotnick Declaration.

15 Petitioner requests that this Petition be granted without a Hearing if no party serves and
16 submits a written notice of opposition to the Petition within the 10 days allowed by California Rule
17 of Court 3.544(a). If any party serves a written opposition to the Petition, Petitioner requests that
18 the Court schedule a Hearing on this matter at its earliest convenience.

19 Dated: February 7, 2007

KRAUSE KALFAYAN BENINK
& SLAVENS LLP

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23 _____
24 Ralph B. Kalfayan, Esq.
25 David B. Zlotnick, Esq.

26 Attorneys for Plaintiff and the Class
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1 **PROOF OF SERVICE**

2 I, Aimee Vignocchi, declare:

3 I am a resident of the State of California and over the age of eighteen years, and not a
4 party to the within action; my business address is 625 Broadway, Suite 635, San Diego,
Californai, 92101. On **February 7, 2007**, I served the within document(s):

5 **PETITION FOR COORDINATION OF ADD-ON CASE**

6 ☒ by posting the document(s) listed above to the Santa Clara County Superior Court
7 website in regard to the Antelope Valley Groundwater matter.

8 ☒ by placing the document(s) listed above in a sealed envelope with postage thereon
9 fully prepaid, in the United States mail at San Diego, California addressed as set
forth below:

10 Hon. Ronald M. George, Chair
11 Judicial Council of California
455 Golden Gate Avenue
San Francisco, CA 94102-3660

12 ☐ by causing personal delivery by Cal Express of the document(s) listed above to the
13 person(s) at the address(es) set forth below.

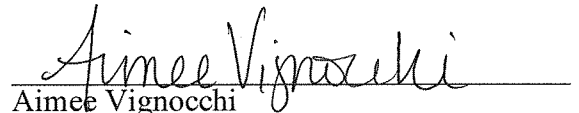
14 ☐ by personally delivering the document(s) listed above to the person(s) at the
address(es) set forth below.

15 ☐ I caused such envelope to be delivered via overnight delivery addressed as
16 indicated on the attached service list. Such envelope was deposited for delivery
by UPS following the firm's ordinary business practices.

17 I am readily familiar with the firm's practice of collection and processing correspondence
18 for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same
19 day with the postage thereon fully prepaid in the ordinary course of business. I am aware that on
motion of the party served, service is presumed invalid if postal cancellation date or postage
meter date is more than one day after date of deposit for mailing in affidavit.

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

22 Executed on February 7, 2007, at San Diego, California.

23 
24 Aimee Vignocchi