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Attorneys for Plaintiff
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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

ANTELOPE VALLEY
GROUNDWATER CASES

This Pleading Relates to Included Action:
REBECCA LEE WILLIS, on behalf of herself
and all others similarly situated,

Plaintiff,

vs.

LOS ANGELES COUNTY WATERWORKS
DISTRICT NO. 40; CITY OF LANCASTER;
CITY OF PALMDALE; PALMDALE WATER
DISTRICT; LITTLEROCK CREEK
IRRIGATION DISTRICT; PALM RANCH
IRRIGATION DISTRICT; QUARTZ HILL
WATER DISTRICT; ANTELOPE VALLEY
WATER CO.; ROSAMOND COMMUNITY
SERVICE DISTRICT; PHELAN PINON HILL
COMMUNITY SERVICE DISTRICT; and
DOES 1 through 1,000;

Defendants.

) RELATED CASE TO JUDICIAL
) COUNCIL COORDINATION
) PROCEEDING NO. 4408
)

) **NOTICE OF MOTION AND MOTION**
) **FOR WRIT OF MANDATE;**
) **MEMORANDUM OF POINTS AND**
) **AUTHORITIES IN SUPPORT OF**
) **MOTION FOR WRIT OF MANDATE;**
) **DECLARATION OF DAVID B.**
) **ZLOTNICK; NOTICE OF LODGMENT**

) Date: August 30, 2011
) Time: 10:00 a.m.
) Judge: Hon. Jack Komar
)

1
2 **NOTICE OF MOTION AND MOTION FOR WRIT OF MANDATE**

3 **PLEASE TAKE NOTICE** that, on August 30, 2011 at 10:00 a.m., Petitioners
4 Rebecca Willis and Krause Kalfayan Benink & Slavens LLP will move before this Court for a
5 Writ of Mandate directing Respondents Los Angeles County Waterworks District No. 40, the
6 City Of Palmdale, Littlerock Creek Irrigation District, Palm Ranch Irrigation District, Desert
7 Lake Community Services District, North Edwards Water District, and Quartz Hill Water
8 District (“Respondents”) to pay the full amount still due Petitioners under the Court’s May 4,
9 2011 Fee Order, as well as interest thereon, or to agree to make payment as provided by sections
10 970 et seq. of the Government Code.

11 In the alternative, Petitioners will move for an alternative writ of mandamus commanding
12 respondents to cause their representatives to appear before this Court and show cause why they
13 have not paid or agreed to pay the fees and costs allowed by the Fee Order and, after hearing,
14 issue a peremptory writ of mandate commanding respondent to comply with the Fee Order.

15 In support of this Motion, Petitioners rely upon the accompanying Verified Petition for
16 Writ of Mandate, Memorandum of Points and Authorities, Declaration of David B. Zlotnick, and
17 the Notice of Lodgment with related Exhibits, as well as the record of this matter and any
18 argument presented at the Hearing.

19 Dated: August 5, 2011

20 KRAUSE KALFAYAN BENINK
21 & SLAVENS LLP

22
23 /s/David B. Zlotnick
24 Ralph B. Kalfayan, Esq.
25 David B. Zlotnick, Esq.
26 Attorneys for Petitioners