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Attorneys for Plaintiff  
Rebecca Lee Willis and the Willis Class

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

**ANTELOPE VALLEY  
GROUNDWATER CASES**

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

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

) **DECLARATION OF DAVID B.  
) ZLOTNICK IN SUPPORT OF  
) PETITION AND MOTION FOR A  
) WRIT OF MANDATE**  
)

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;

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

Defendants.

I, David B. Zlotnick, declare and state as follows:

1. I am Of Counsel to the law firm of Krause Kalfayan Benink & Slavens LLP  
("KKBS"), counsel for the Willis Class in the above captioned matter. I submit this declaration

1 in support of the Verified Petition for a Writ of Mandate and the Motion for Writ of Mandate  
2 being filed contemporaneously with this Declaration. The matters stated herein are true to the  
3 best of my personal knowledge and, if called upon to testify thereto, I could and would  
4 competently do so.

5 2. On July 19, 2011 I wrote to the Respondents and requested that they pay their  
6 proportionate share of the fees and costs awarded by this Court in its May 4, 2011 Order.  
7 Respondents have failed to either pay those fees or to agree to do so.  
8

9 3. The documents attached to the accompanying Notice of Lodgment are true and  
10 correct copies of the (A) Willis Class Stipulation of Settlement, (B) Final Judgment Approving  
11 Willis Class Settlement, and (C) Order After Hearing on Motion by Rebecca Lee Willis and the  
12 Class for Attorneys' Fees, Reimbursement of Expenses and Class Representative Incentive  
13 Award.  
14

15 4. I declare under penalty of perjury and under the laws of the State of California  
16 that the foregoing is true and correct. Executed this 5<sup>th</sup> day of August, 2011, in San Diego,  
17 California.  
18

19 /s/ David B. Zlotnick  
20 David B. Zlotnick.  
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