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

10 REBECCA LEE WILLIS, on behalf of herself)
11 and all others similarly situated,)

12 Plaintiff,)

13 vs.)

14 LOS ANGELES COUNTY WATERWORKS)
DISTRICT NO. 40; CITY OF LANCASTER;)
15 CITY OF LOS ANGELES; CITY OF)
PALMDALE; PALMDALE WATER)
16 DISTRICT; LITTLEROCK CREEK)
IRRIGATION DISTRICT; PALM RANCH)
17 IRRIGATION DISTRICT; QUARTZ HILL)
WATER DISTRICT; ANTELOPE VALLEY)
18 WATER CO.; ROSAMOND COMMUNITY)
SERVICE DISTRICT; MOJAVE PUBLIC)
19 UTILITY DISTRICT; and DOES 1 through)
1,000;)

20 Defendants.)
21 _____)

JUDICIAL COUNCIL COORDINATION
PROCEEDING NO. 4408

PLAINTIFF WILLIS' NOTICE OF MOTION
FOR CLASS CERTIFICATION

Hearing:

Date: August 20, 2007

Time: 9:00 a.m.

Place: Dept. 1 (L.A. Super. Ct.)

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23 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

24 PLEASE TAKE NOTICE that on August 20, 2007 at 9:00 a.m. in Department 1 of the Los
25 Angeles County Superior Court, plaintiff Rebecca Lee Willis, by and through her attorneys, will
26 move and hereby does move this Court pursuant to Section 382 of the California Code of Civil
27 Procedure and Cal. Rules Ct., Rule 1854(a)(1) for an order certifying a class defined as follows:
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All private (i.e., non-governmental) persons and entities that own real property within the Basin, as adjudicated, that are not presently pumping water on their property and have not done so within the last two (2) years (“the Class”). The Class excludes the defendants herein, any person, firm, trust, corporation, or other entity in which any defendant has a controlling interest or which is related to or affiliated with any of the defendants, and the representatives, heirs, successors-in-interest or assigns of any such excluded party. The Class also excludes all persons to the extent their properties are connected to a municipal water system from which they receive or are able to receive water service.

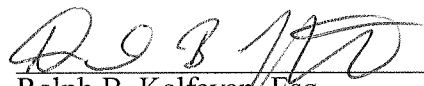
Plaintiff will also move that she be designated as the lead plaintiff and that her attorneys be designated as the lead counsel for the class.

This motion is made on the grounds that the elements of C.C.P. § 382 can be satisfied in that there are both 1) an ascertainable class and 2) a well-defined community of interest in questions of law and fact among the members of that class.

This motion is based upon the files and records of this case, this notice of motion and motion, the allegations in the First Amended Complaint on file herein, the memorandum of points and authorities filed in support of this motion, the Declaration of David B. Zlotnick filed herewith, and such other documentary and testimonial evidence as shall be submitted to this Court and argued at the hearing on this matter.

Dated: July 23, 2007

KRAUSE KALFAYAN BENINK
& SLAVENS



Ralph B. Kalfayan, Esq.
David B. Zlotnick
Attorneys for Plaintiff