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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

DECLARATION OF DAVID B. ZLOTNICK
IN SUPPORT OF PLAINTIFF WILLIS'
MOTION FOR CLASS CERTIFICATION

Hearing:

Date: August 20, 2007

Time: 9:00 a.m.

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

1 I, David B. Zlotnick, declare as follows:

2 1. I am over the age of eighteen and the attorney of record for Plaintiff Rebecca Lee
3 Willis in the above-entitled action. I have personal knowledge of the facts stated below, and if called
4 upon, I could and would testify competently thereto.

5 2. I submit this Declaration in support of Willis' Motion for Class Certification. Willis
6 seeks certification of a Class defined as follows

7 All private (i.e., non-governmental) persons and entities that own real property
8 within the Basin, as adjudicated, that are not presently pumping water on their
9 property and have not done so within the last two (2) years ("the Class"). The Class
10 excludes the defendants herein, any person, firm, trust, corporation, or other entity in
11 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.

12 3. I believe that it is undisputed that there are numerous landowners in the Antelope
13 Valley Basin who fall within the class definition.

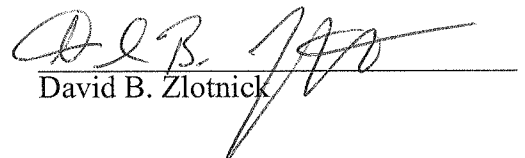
14 4. I have personally been contacted by at least seven (7) members of the putative class
15 who have stated that they support certification of a Class in that they cannot afford the expense of
16 retaining counsel and directly participating in this litigation, but want their position protected to the
17 extent allowed by law.

18 5. I and the other attorneys representing Plaintiff and the putative class have extensive
19 experience in handling complex class actions. I see no likely difficulties in the management of this
20 case as a class action.

21 I declare under penalty of perjury that the foregoing is true and correct.

22 Executed on July 23, 2007 in San Diego, California.

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David B. Zlotnick