

EXHIBIT A

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

REBECCA LEE WILLIS, on behalf of) JUDICIAL COUNCIL COORDINATION
herself and all others similarly situated,) PROCEEDING NO. 4408

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; and DOES 1 through)
1,000;)

Defendants.

NOTICE OF CLASS ACTION

TO: ALL PRIVATE LANDOWNERS WITHIN THE ANTELOPE VALLEY

THIS LAWSUIT MAY AFFECT YOUR PROPERTY RIGHTS

This notice is to advise you about a pending class action lawsuit. You may be a member of the Class. **PLEASE TAKE THE TIME TO READ THIS IMPORTANT LEGAL NOTICE. YOU ARE REQUIRED TO RETURN THE ATTACHED RESPONSE FORM BY _____, 2008.**

This case involves water rights in the Antelope Valley Groundwater Basin. Rebecca Willis brought this case to protect her right and that of other landowners in the Basin to pump water on their properties in the future. The case has been combined with other cases to determine all the groundwater rights in the Basin. **The court has not yet decided the case.** This Notice is intended to inform you of the pendency of this case and advise you how you can protect your rights. You have been sent this Notice because, as a property owner in the Antelope Valley, your rights to pump and use groundwater on your property may be affected by this case.

ARE YOU A MEMBER OF THE CLASS?

The class includes all private (i.e., non-governmental) landowners within the Antelope Valley Groundwater Basin, as defined by the Court, who are **not** now pumping groundwater on their property and have not pumped water on their property since January 18, 2001. A map of the Basin is attached to this notice. The class of non-pumpers is represented by Rebecca Willis, who owns 10 acres in the Basin.

If you pump groundwater on your property or have done so since January 18, 2001, you are not a member of the Class. BUT YOU MUST STILL RETURN THE ATTACHED RESPONSE FORM TELLING THE COURT THAT YOU ARE NOT A MEMBER OF THE CLASS, OR ELSE YOU WILL BE TREATED AS A MEMBER OF THE CLASS AND YOUR RIGHTS TO USE WATER ON YOUR PROPERTY MAY BE PREJUDICED.

WHAT IS THE CASE ABOUT?

Under California law, property owners have a right to pump and use groundwater on their land. In this case, however, the naturally available supply of water in the Basin is not adequate to satisfy everyone who wants to use that water. Plaintiff Willis claims that she and other landowners have water rights which are superior to the rights of certain public water suppliers (listed as defendants on page 1) to use that water. The public water suppliers claim that their historical pumping has given them superior water rights. If the public water suppliers win, your rights to use the groundwater under your property may be cut back or even eliminated. The Court has not yet ruled on these claims.

WHAT DO YOU NEED TO DO?

You are required to complete and return the attached RESPONSE FORM by _____, 2008.

If you own property within the Basin, you should complete and return the attached response form stating (A) whether you are a member of the Class and, if so, whether you wish to (i) remain in the Class or (ii) exclude yourself from the Class.

If you remain in the Class

- You will be bound by the decision in the case, whether favorable or unfavorable; and
- Plaintiff Willis and her attorneys will act as your representatives in this case, and you will not personally be obligated to pay any fees or costs out of your pocket.

- You *may*, but need not, hire your own lawyer at your own expense to represent you.

If you exclude yourself from the Class,

- You will not be bound by any decision that affects the class;
- But you will be added to the lawsuit as an individual defendant, and you will have to represent yourself or hire a lawyer to represent you.

Please complete and return the attached response form no later than _____, 2008

to the following:

Antelope Valley Groundwater Litigation

P.O. BOX _____

_____, CA _____

WHERE CAN YOU GET ADDITIONAL INFORMATION?

The complaint and certain other documents from the litigation are available at

www._____. In addition, that website has a list of answers to certain other questions you may have. That website will be updated from time to time to advise you of the status of this litigation.

Also, all of the documents filed in the case are available on the court's website at

<http://www.scefiling.org/cases/casehome.jsp?caseId=19>.

In addition, you may contact the following counsel for further information:

David B. Zlotnick, Esq.

625 Broadway

Suite 635

San Diego, CA 92101

619-232-0331

(Class Counsel)

PLEASE DO NOT CALL OR WRITE THE COURT OR CLERK'S OFFICE. IF YOU HAVE ANY QUESTIONS, PLEASE CONSULT YOUR OWN COUNSEL OR CONTACT CLASS COUNSEL AT THE ADDRESS ABOVE.

WHAT IF I SELL OR TRANSFER MY PROPERTY?

BY THE ENCLOSED ORDER DATED _____, 2008, THE COURT RULED THAT BUYERS AND OTHER TRANSFEREES OF PROPERTY WITHIN THE BASIN WILL BE BOUND BY ANY RULINGS IN THIS CASE. YOU ARE REQUIRED TO ADVISE ANYONE WHO BUYS OR OTHERWISE ACQUIRES AN INTEREST IN YOUR PROPERTY OF THIS CASE, AND GIVE THEM A COPY OF THIS NOTICE AND THE ENCLOSED ORDER AT LEAST ____ DAYS BEFORE SELLING OR TRANSFERRING YOUR PROPERTY.

Dated: _____, 2008

BY ORDER OF THE SUPERIOR COURT OF CALIFORNIA FOR
THE COUNTY OF LOS ANGELES

EXHIBIT A WILL BE THE MAP SHOWING THE BASIN (as set out in the Court's ruling).

ANTELOPE VALLEY GROUNDWATER LITIGATION RESPONSE FORM

[SELF MAILER]

PLEASE COMPLETE A SEPARATE FORM FOR EACH PARCEL YOU OWN WITHIN THE BASIN.

PLEASE CHECK THE APPROPRIATE BOXES BELOW AND RETURN THIS MAILER AS SOON AS POSSIBLE AND IN ANY EVENT BEFORE _____, 2008. IF YOU HAVE ANY QUESTIONS, PLEASE CONSULT YOUR COUNSEL OR CLASS COUNSEL LISTED ABOVE. PLEASE CHECK ONLY ONE BOX FOR EACH ITEM. PLEASE THEN SIGN, FOLD, AND RETURN THE FORM.

1. I DO ___ DO NOT ___ OWN PROPERTY WITHIN THE ANTELOPE VALLEY GROUNDWATER BASIN (AS SHOWN ON EXHIBIT A, ABOVE)

*IF YOU ANSWERED NO, PLEASE SIGN AND DATE BELOW AND RETURN THIS FORM. IF YOU ANSWERED YES, PLEASE CHECK **ONE** ANSWER FOR EACH STATEMENT BELOW:*

2. I AM ___ AM NOT ___ PRESENTLY PUMPING GROUNDWATER ON MY PROPERTY.

3. I (or my predecessor owners) DID ___ DID NOT ___ PUMP GROUNDWATER ON MY PROPERTY SINCE JANUARY 1, 2000.

1. IF YOU DO NOT PUMP WATER AND HAVE NOT DONE SO SINCE JANUARY 18, 2001, PLEASE SELECT ONE OF THE FOLLOWING:

A. I WANT TO REMAIN IN THE CLASS. _____

B. I WANT TO EXCLUDE MYSELF FROM THE CLASS. _____

ASSESSOR'S PARCEL NUMBER AND ADDRESS OR LEGAL DESCRIPTION OF YOUR PROPERTY IN THE BASIN:

THE ABOVE ANTELOPE VALLEY BASIN PROPERTY TOTALS APPROXIMATELY _____ ACRES.

PLEASE COMPLETE A SEPARATE FORM FOR EACH SEPARATE PARCEL YOU OWN IN THE BASIN.

(PRINT YOUR NAME)

(SIGNATURE)

(MAILING ADDRESS)

(CITY, STATE, ZIP CODE)

(E-mail address or telephone number)