

BEST BEST & KRIEGER LLP

ERIC L. GARNER, Bar No. 130665

JEFFREY V. DUNN, Bar No. 131926

WENDY Y. WANG, Bar No. 228923

18101 VON KARMAN AVENUE, SUITE 1000

IRVINE, CALIFORNIA 92612

TELEPHONE: (949) 263-2600

TELECOPIER: (949) 260-0972

Attorneys for LOS ANGELES COUNTY
WATERWORKS DISTRICT NO. 40

OFFICE OF COUNTY COUNSEL

COUNTY OF LOS ANGELES

RICHARD D. WEISS, BAR NO. 89791

ACTING COUNTY COUNSEL

WARREN WELLEN, Bar No. 139152

PRINCIPAL DEPUTY COUNTY COUNSEL

500 WEST TEMPLE STREET

LOS ANGELES, CALIFORNIA 90012

TELEPHONE: (213) 974-8407

TELECOPIER: (213) 687-7337

Attorneys for LOS ANGELES COUNTY
WATERWORKS DISTRICT NO. 40

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES – CENTRAL DISTRICT

**ANTELOPE VALLEY GROUNDWATER
CASES**

Included Actions:

Los Angeles County Waterworks District No.
40 v. Diamond Farming Co., Superior Court of
California, County of Los Angeles, Case No.
BC 325201;

Los Angeles County Waterworks District No.
40 v. Diamond Farming Co., Superior Court of
California, County of Kern, Case No. S-1500-
CV-254-348;

Wm. Bolthouse Farms, Inc. v. City of
Lancaster, Diamond Farming Co. v. City of
Lancaster, Diamond Farming Co. v. Palmdale
Water Dist., Superior Court of California,
County of Riverside, Case Nos. RIC 353 840,
RIC 344 436, RIC 344 668

RICHARD WOOD, on behalf of himself and
all other similarly situated v. A.V. Materials,
Inc., et al., Superior Court of California,
County of Los Angeles, Case No. BC509546

**EXEMPT FROM FILING FEES
UNDER GOVERNMENT CODE
SECTION 6103**

Judicial Council Coordination Proceeding
No. 4408

CLASS ACTION

Santa Clara Case No. 1-05-CV-049053
Assigned to the Honorable Jack Komar

**DECLARATION OF WENDY Y. WANG
IN SUPPORT OF LIMITED OPPOSITION
TO WILLIS CLASS' MOTION FOR
LEAVE TO ADD OR SUBSTITUTE
CLASS REPRESENTATIVES**

Date: November 4, 2014
Time: 9:00 a.m.
Dept. 3, Room 224

DECLARATION OF WENDY Y. WANG

I, Wendy Y. Wang, declare:

1. I have personal knowledge of the facts below, and if called upon to do so, I could testify competently thereto in a court of law.

2. I am an attorney licensed to practice law in the State of California. I am an associate of Best, Best & Krieger LLP, attorneys of record for Los Angeles County Waterworks District No. 40 ("District No. 40").

3. Attached as Exhibit "A" is a true and correct copy of the Order Certifying Plaintiff Class, dated September 11, 2007.

4. Attached as Exhibit "B" is a true and correct copy of the Order Modifying Class Definition and Allowing Parties to Opt In to the Plaintiff Class, dated May 22, 2008.

5. Attached as Exhibit "C" is a true and correct copy of the Second Order Modifying Definition of Plaintiff Class, dated September 2, 2008.

6. Attached as Exhibit "D" is a true and correct copy of the Answer filed by Leslie Property, dated December 26, 2006.

7. Attached as Exhibit "E" is a true and correct copy of the Public Water Suppliers' First Amended Cross-Complaint, dated January 10, 2007.

8. Attached as Exhibit "F" is a true and correct copy of Leslie Property's Response to WM. Bolthouse Farms, Inc.'s Request for Admissions, dated January 31, 2014.

9. Attached as Exhibit "G" is a true and correct copy of Leslie Property's Response to WM. Bolthouse Farms, Inc.'s Form Interrogatories, dated January 31, 2014.

10. Attached as Exhibit "H" is a true and correct copy of Leslie Property's Response to WM. Bolthouse Farms, Inc.'s Request for Production of Documents, dated January 31, 2014.

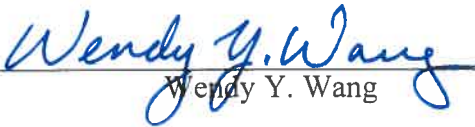
11. On October 22, 2014 at approximately 11:00 a.m., I telephoned Mr. Ralph Kalfayan, counsel for the Willis Class, regarding whether he was aware that the Archdiocese of Los Angeles ("Archdiocese") was named as a party to this coordinated action and that the Archdiocese had responded to certain discovery requests. Mr. Kalfayan indicated that he was unaware of filings made by the Archdiocese regarding the "Leslie Property". In response to my

1 question whether the Archdiocese had opted into the Willis Class, Mr. Kalfayan informed me that
2 he did not know, but planned to call Mr. Alan Graf—the counsel of record for the “Leslie
3 Property”—for more information. Mr. Kalfayan indicated that he would call me back after
4 speaking with Mr. Graf.

5 12. At approximately 3:15 p.m. today, Mr. Kalfayan called me and confirmed that the
6 Archdiocese had not opted into the Willis Class.

7 I declare under penalty of perjury under the laws of the State of California that the
8 foregoing is true and correct.

9 Executed this 22th day of October, 2014, at Los Angeles, California.

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12 Wendy Y. Wang

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PROOF OF SERVICE

I, Sandra K. Sandoval, declare:

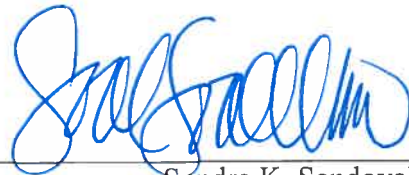
I am a resident of the State of California and over the age of eighteen years, and not a party to the within action; my business address is Best Best & Krieger LLP, 300 South Grand Avenue, 25th Floor, Los Angeles, CA 90071. On October 22, 2014, I served the within document(s):

DECLARATION OF WENDY Y. WANG IN SUPPORT OF LIMITED OPPOSITION
TO WILLIS CLASS' MOTION FOR LEAVE TO ADD OR SUBSTITUTE CLASS
REPRESENTATIVES



by posting the document(s) listed above to the Santa Clara County Superior Court website in regard to the Antelope Valley Groundwater matter.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on October 22, 2014, at Los Angeles, California.



Sandra K. Sandoval