

EXHIBIT 2

BEST BEST & KRIEGER LLP
ERIC L. GARNER, Bar No. 130665
JEFFREY V. DUNN, Bar No. 131926
WENDY Y. WANG, Bar No. 228923
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WATERWORKS DISTRICT NO. 40

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COUNTY COUNSEL
WARREN WELLEN, Bar No. 139152
PRINCIPAL DEPUTY COUNTY COUNSEL
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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

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County of Los Angeles

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Sheri R. Carter, Executive Officer/Clerk
By Reynaldo Echon, Deputy

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 LOS ANGELES
COUNTY WATERWORKS DISTRICT
NO. 40'S OPPOSITION TO WILLIS
CLASS' RENEWED MOTION TO ADD
LEAD PLAINTIFF

Date: December 22, 2014
Time: 9:00 a.m.
Dept. 1

BEST BEST & KRIEGER LLP

ERIC L. GARNER, Bar No. 130665

JEFFREY V. DUNN, Bar No. 131926

WENDY Y. WANG, Bar No. 228923

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WATERWORKS DISTRICT NO. 40

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TELEPHONE: (213) 974-8407

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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**

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IN SUPPORT OF LOS ANGELES
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NO. 40'S OPPOSITION TO WILLIS
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LEAD PLAINTIFF**

Date: December 22, 2014

Time: 9:00 a.m.

Dept. 1

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 an excerpt from the Court Reporter's Transcript of the hearing on July 20, 2007, with the statement from Mr. Alan Graf highlighted.

4. Attached as Exhibit "B" is a true and correct copy of an excerpt from the Court Reporter's Transcript of the hearing on August 20, 2007, of which I have highlighted certain portions.

5. On December 4 and 6, 2014, I visited a website at www.la-archdiocese.org, which purports to be the website of the Roman Catholic Archbishop of Los Angeles ("Archdiocese Website"). The website bears the copyright mark, dated 2014, indicating that the copyrights of the website belongs to the Roman Catholic Archbishop of Los Angeles. Attached as Exhibit "C" is a true and correct copy of the home page of the website that I printed on December 6, 2014.

6. On December 4, 2014, I used the Archdiocese Website to conduct a search of Catholic parishes located within twenty (20) miles of Rosamond and Palmdale and found three (3) parishes within that area. The name and addresses of these three parishes are as follows:

Sacred Heart Catholic Church
625 West Kettering Street
Lancaster, CA 93534

Blessed Junipero Serra Catholic Church
42121 North 60th Street West
Lancaster, CA 93536

St. Mary Catholic Church
1600 East Avenue R4
Palmdale, CA 93550

7. Attached as Exhibit "D" are true and correct copies of printouts from the Archdiocese Website, showing the search I conducted on December 4, 2014 and the location of the three Catholic parishes located within twenty miles of Rosamond and Palmdale.

8. On December 4, 2014, I used the Archdiocese Website to conduct a search of Catholic schools located within twenty (20) miles of Rosamond and Palmdale and found four (4) schools within that area. The name and addresses of these four schools are as follows:

Sacred Heart Elementary School
45002 North Date Avenue
Lancaster, CA 93534

Mission Bell Preschool
42121 North 60th Street West
Lancaster, CA 93536

Paraclete High School
42145 North 30th Street
Lancaster, CA 93536

St. Mary Elementary
1600 East Avenue R4
Palmdale, CA 93550

7. Attached as Exhibit "E" are true and correct copies of the Archdiocese Website, showing the search I conducted on December 4, 2014 and the location of the four Catholic schools located within twenty miles of Rosamond and Palmdale.

8. Attached as Exhibit "F" is a true and correct copy of an excerpt from the Court Reporter's Transcript of the hearing on November 4, 2014, of which I have highlighted certain portions.

Executed this 8th day of December, 2014, at Los Angeles, California.



Wendy Y. Wang

EXHIBIT A

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA

2 FOR THE COUNTY OF LOS ANGELES

3 DEPARTMENT NO. 1

HON. JACK KOMAR, JUDGE

4
5 COORDINATION PROCEEDING)
6 SPECIAL TITLE (RULE 1550B))
7 ANTELOPE VALLEY GROUNDWATER CASES))

JUDICIAL COUNCIL
COORDINATION NO. P4408

8 PALMDALE WATER DISTRICT AND)
9 QUARTZ HILL WATER DISTRICT,)

SANTA CLARA CASE NO.
1-05-CV-049053

10 CROSS-COMPLAINANTS,)

11 VS)

12 LOS ANGELES COUNTY WATERWORKS,)
13 DISTRICT NO. 40, ET AL,)

14 CROSS-DEFENDANTS.)

15 REPORTER'S TRANSCRIPT OF PROCEEDINGS

16 **FRIDAY, JULY 20, 2007**

17
18 APPEARANCES:

19 (SEE APPEARANCE PAGES)

20
21
22
23
24 ORIGINAL

25
26
27 CHARLOTTE NICHOLAS MOHAMED, CSR #2384
28 OFFICIAL REPORTER

1 ENTERPRISES, SHEEP CREEK, AND SERVICE ROCK.

2 MR. HAUCK: GOOD MORNING, YOUR HONOR.

3 WILLIAM HAUCK ON BEHALF OF ANTELOPE VALLEY MUTUAL
4 GROUP.

5 MR. ZLOTNICK: GOOD MORNING, YOUR HONOR.

6 DAVID ZLOTNICK ON BEHALF OF REBECCA WILLIS.

7 MR. GRAF: GOOD MORNING, YOUR HONOR.

8 ALLAN GRAF ON BEHALF OF THE LESLIE PROPERTY AND
9 THE ARCHDIOCESE OF LOS ANGELES.

10 THE COURT: OKAY. LET'S HAVE THE TELEPHONIC
11 APPEARANCES.

12 MR. KUNEY: GOOD MORNING, YOUR HONOR.

13 SCOTT KUNEY ON BEHALF OF VAN DAM FARMS.

14 MR. LEININGER: GOOD MORNING, YOUR HONOR.

15 THIS IS LEE LEININGER ON BEHALF OF THE UNITED
16 STATES.

17 MS. GOLDSMITH: GOOD MORNING, YOUR HONOR.

18 THIS IS JANET GOLDSMITH ON BEHALF OF THE CITY OF
19 LOS ANGELES.

20 MR. KIEL: GOOD MORNING, YOUR HONOR.

21 PETER KIEL ON BEHALF OF COUNTY SANITATION
22 DISTRICT NUMBERS 14 AND 20.

23 MS. CAHILL: GOOD MORNING, YOUR HONOR.

24 VIRGINIA CAHILL ON BEHALF OF THE STATE OF
25 CALIFORNIA, SANTA MONICA MOUNTAINS CONSERVANCY, AND THE 58TH
26 DISTRICT AGRICULTURAL ASSOCIATION.

27 MR. HOLMES: GOOD MORNING, YOUR HONOR.

28 MIKE HOLMES ON BEHALF OF SPC DEL SUR RANCH, LLC.

SUPERIOR COURT FOR THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

DEPARTMENT NO. 1

HON. JACK KOMAR, JUDGE

COORDINATION PROCEEDING)
SPECIAL TITLE (RULE 1550 (B)))

ANTELOPE VALLEY GROUNDWATER CASES)

JUDICIAL COUNCIL
COORDINATION NO. P4408

PALMDALE WATER DISTRICT AND)
QUARTZ HILL WATER DISTRICT,)

SANTA CLARA CASE NO.
1-05-CV-049053

CROSS-COMPLAINANTS,)

VS)

LOS ANGELES COUNTY WATERWORKS,)
DISTRICT NO. 40, ET AL,)

REPORTER'S CERTIFICATE

CROSS-DEFENDANTS.)

STATE OF CALIFORNIA)
) SS.
COUNTY OF LOS ANGELES)

I, CHARLOTTE NICHOLAS MOHAMED, CSR, OFFICIAL
REPORTER OF THE SUPERIOR COURT OF THE STATE OF CALIFORNIA,
FOR THE COUNTY OF LOS ANGELES, DO HEREBY CERTIFY THAT THE
FOREGOING PAGES, 1 THROUGH 29, COMPRISE A TRUE AND
CORRECT TRANSCRIPT OF THE PROCEEDINGS HELD IN THE
ABOVE-ENTITLED MATTER ON FRIDAY, JULY 20, 2007.

DATED THIS 24TH DAY OF JULY, 2007.



CHARLOTTE NICHOLAS MOHAMED, CSR #2384
OFFICIAL REPORTER

EXHIBIT B

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

DEPARTMENT NO. 1

HON. JACK KOMAR, JUDGE

COORDINATION PROCEEDING)
SPECIAL TITLE (RULE 1550B))

ANTELOPE VALLEY GROUNDWATER CASES)

JUDICIAL COUNCIL
COORDINATION NO. P4408

PALMDALE WATER DISTRICT AND)
QUARTZ HILL WATER DISTRICT,)

SANTA CLARA CASE NO.
1-05-CV-049053

CROSS-COMPLAINANTS,)

VS)

LOS ANGELES COUNTY WATERWORKS,)
DISTRICT NO. 40, ET AL,)

CROSS-DEFENDANTS.)

REPORTER'S TRANSCRIPT OF PROCEEDINGS

MONDAY, AUGUST 20, 2007

APPEARANCES:

(SEE APPEARANCE PAGES)

ORIGINAL

CHARLOTTE NICHOLAS MOHAMED, CSR #2384
OFFICIAL REPORTER

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(415) 268-7209

5 VAN DAM FARMS:
6 (VIA TELEPHONE)

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8 AVEK:
9 (VIA TELEPHONE)
(PERSONALLY PRESENT)

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TIMOTHY A. DE WALT, ESQ.
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SAN BERNARDINO, CA 92408
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11 THE UNITED STATES:
12 (VIA TELEPHONE)

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U.S. DEPARTMENT OF JUSTICE
ENVIRONMENT & NATURAL RESOURCES
DIVISION
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DENVER, CO 80294
(303) 844-1364

16 ANTELOPE VALLEY
17 MUTUAL GROUP

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19 SPC DEL SUR RANCH
20
21 (VIA TELEPHONE)

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24 (VIA TELEPHONE)

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26 ARCHDIOCESE OF
27 LOS ANGELES

CARLSMITH & BALL, LLP
BY: ALLAN J. GRAF, ESQ.
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LOS ANGELES, CA 90071
(213) 955-1200

1 JEFFREY DUNN ON BEHALF OF ROSAMOND COMMUNITY
2 SERVICES DISTRICT AND LOS ANGELES COUNTY WATERWORKS DISTRICT
3 NUMBER 40.

4 MR. MARKMAN: GOOD MORNING, YOUR HONOR.

5 JAMES MARKMAN FOR THE CITY OF PALMDALE.

6 MR. HAUCK: GOOD MORNING, YOUR HONOR.

7 WILLIAM HAUCK OF COVINGTON AND CROWE, FOR THE
8 A.V. UNITED MUTUAL GROUP.

9 THE COURT: ANY OTHER COUNSEL IN THE COURTROOM WHO
10 INTEND TO APPEAR?

11 MR. FIFE: GOOD MORNING, YOUR HONOR.

12 MICHAEL FIFE, FOR ANTELOPE VALLEY GROUNDWATER
13 AGREEMENT ASSOCIATION.

14 MR. ZIMMER: RICHARD ZIMMER ON BEHALF OF BOLTHOUSE
15 PROPERTIES AND BOLTHOUSE FARMS.

16 MR. SANDERS: CHRIS SANDERS ON BEHALF OF THE COUNTY
17 SANITATION DISTRICTS OF LOS ANGELES, NUMBERS 14 AND 20.

18 MR. FUDACZ: FRED FUDACZ ON BEHALF OF TEJON RANCH CORP.

19 MR. WEINSTOCK: HENRY WEINSTOCK ALSO ON BEHALF OF TEJON
20 RANCH.

21 MR. EVERTZ: GOOD MORNING, YOUR HONOR.

22 DOUG EVERTZ FOR THE CITY OF LANCASTER.

23 MR. ZLOTNICK: GOOD MORNING, YOUR HONOR.

24 DAVE ZLOTNICK FOR REBECCA WILLIS.

25 MR. DAVIS: GOOD MORNING, YOUR HONOR.

26 MICHAEL DAVIS, GRESHAM SAVAGE NOLAN AND TILDEN,
27 ON BEHALF OF SHEEP CREEK WATER COMPANY, SERVICE ROCK PRODUCTS,
28 AND HEALY.

1 MS. JONES: GOOD MORNING, YOUR HONOR.

2 TAMMY JONES ON BEHALF OF PALMDALE HILLS PROPERTY
3 AND NORTHROP GRUMAN.

4 MR. ALLAN GRAF: GOOD MORNING, YOUR HONOR.

5 ALLAN GRAFF, OF CARLSMITH AND BALL, ON BEHALF OF
6 THE ARCHDIOCESE OF LOS ANGELES.

7 MR. BUNN: GOOD MORNING, YOUR HONOR.

8 THOMAS BUNN ON BEHALF OF QUARTZ HILL WATER
9 DISTRICT AND PALMDALE WATER DISTRICT.

10 MR. TOOTLE: GOOD MORNING, YOUR HONOR.

11 JOHN TOOTLE ON BEHALF OF CALIFORNIA WATER SERVICE
12 COMPANY.

13 THE COURT: ALL RIGHT. AND LET'S NOW HAVE COUNSEL ON
14 THE TELEPHONE, ONE AT A TIME. AND PLEASE SPEAK VERY CLEARLY
15 AND SPELL YOUR LAST NAME.

16 MR. KUNEY: GOOD MORNING, YOUR HONOR.

17 SCOTT KUNEY, K-U-N-E-Y, ON BEHALF OF GERTRUDE AND
18 DELMAR VAN DAM.

19 MR. ALLENBY: GOOD MORNING, YOUR HONOR.

20 ROBERT ALLENBY, A-L-L-E-N-B-Y, FOR SULLIVAN HILL
21 LEWIN REZ AND ENGEL, ON BEHALF OF JUNG TOM.

22 MS. MC KEITH: GOOD MORNING, YOUR HONOR.

23 MALISSA MC KEITH, M-C, K-E-I-T-H, ON BEHALF OF
24 EMPIRE COMPANY AND ANAVERDE LLC.

25 MR. HOLMES: GOOD MORNING, YOUR HONOR.

26 MIKE HOMES, H-O-L-M-E-S, ON BEHALF OF SPC DEL SUR
27 RANCH LLC.

28 MR. HERREMA: GOOD MORNING, YOUR HONOR.

SUPERIOR COURT FOR THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

DEPARTMENT NO. 1

HON. JACK KOMAR, JUDGE

COORDINATION PROCEEDING)
SPECIAL TITLE (RULE 1550(B)))

ANTELOPE VALLEY GROUNDWATER CASES))

JUDICIAL COUNCIL
COORDINATION NO. P4408

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QUARTZ HILL WATER DISTRICT,)

SANTA CLARA CASE NO.
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VS)

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REPORTER'S CERTIFICATE

CROSS-DEFENDANTS.)

STATE OF CALIFORNIA)
) SS.
COUNTY OF LOS ANGELES)

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REPORTER OF THE SUPERIOR COURT OF THE STATE OF CALIFORNIA,
FOR THE COUNTY OF LOS ANGELES, DO HEREBY CERTIFY THAT THE
FOREGOING PAGES, 1 THROUGH 47, COMPRISE A TRUE AND
CORRECT TRANSCRIPT OF THE PROCEEDINGS HELD IN THE
ABOVE-ENTITLED MATTER ON MONDAY, AUGUST 20, 2007.

DATED THIS 21ST DAY OF AUGUST, 2007.

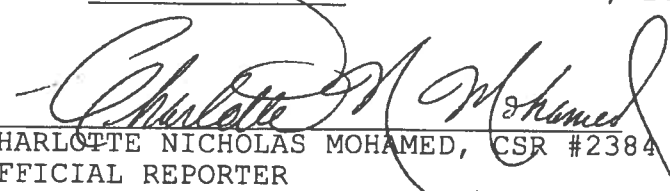

CHARLOTTE NICHOLAS MOHAMED, CSR #2384
OFFICIAL REPORTER

EXHIBIT C

**Archdiocese of
LOS ANGELES**

ACES Webmail Access

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The Media Resource for the Archdiocese of Los Angeles!
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OneLife LA
An event embracing the beauty and dignity of all human life
1.17.15

News/Resources

ARCHBISHOP GOMEZ: ONELIFE LA — AND A CHALLENGE FOR ADVENT

Advent is a season of mercy. The mercy of God is the great theme running through the first stories of Jesus' coming.

[Click to Read](#)



Archbishop's Statement on the announcement of presidential executive orders on immigration
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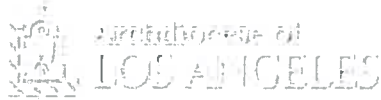
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EXHIBIT D

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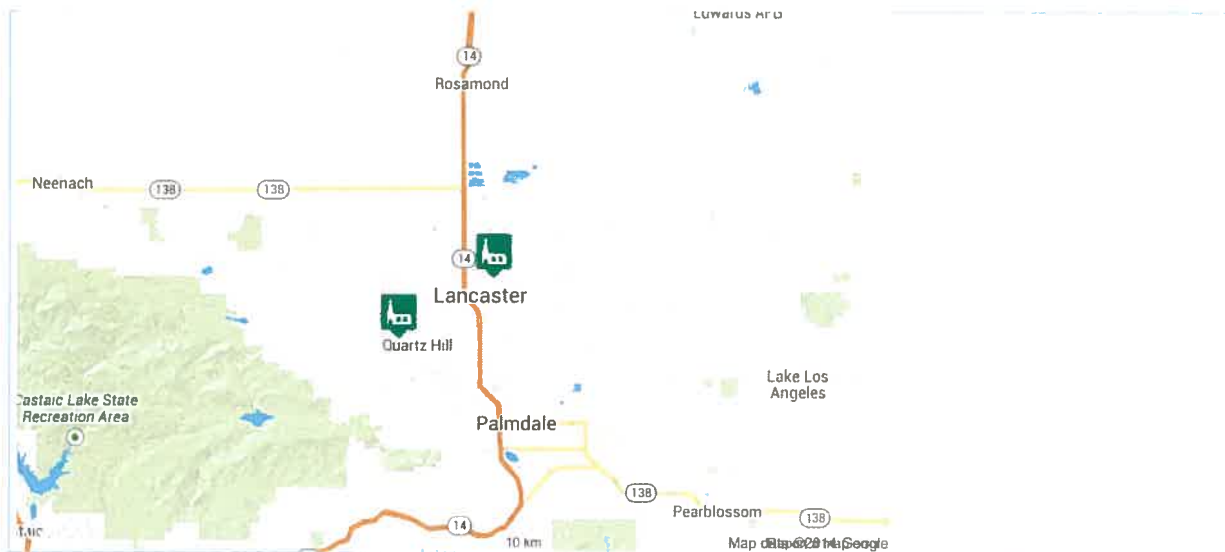
Parish Map

The Archdiocese of Los Angeles Web Portal

Find Parishes near your location. Click on a map marker for further information about that location.

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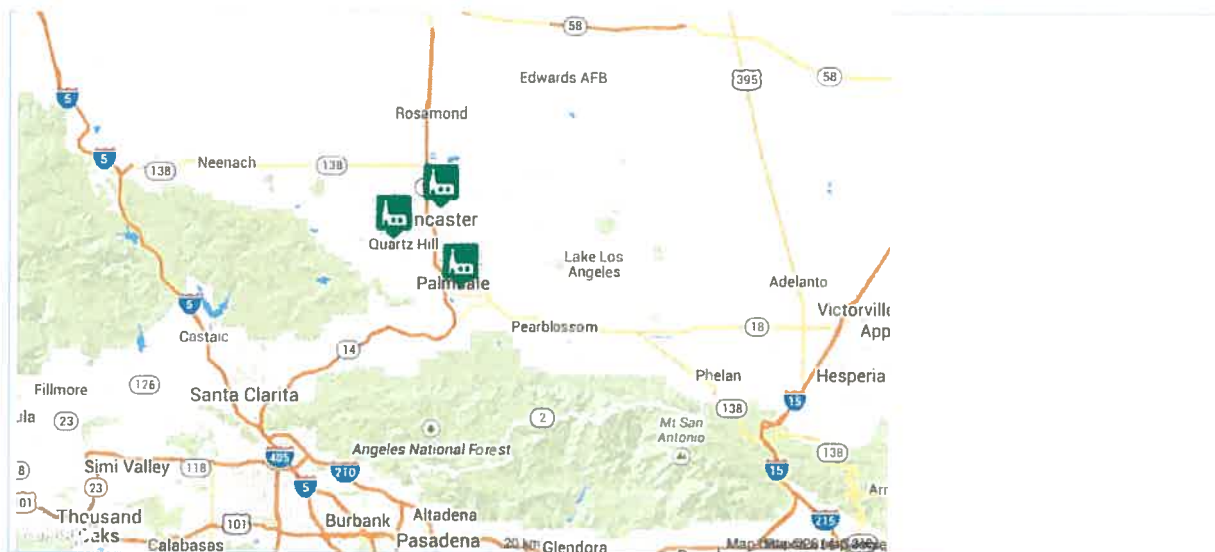
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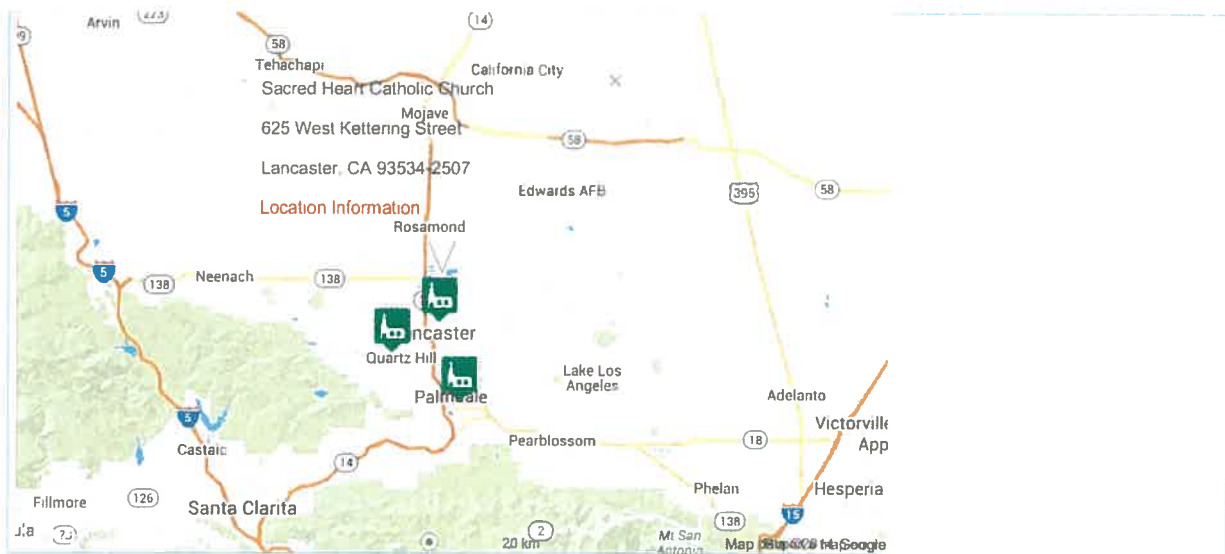
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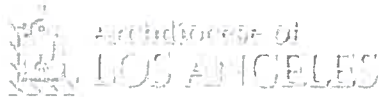
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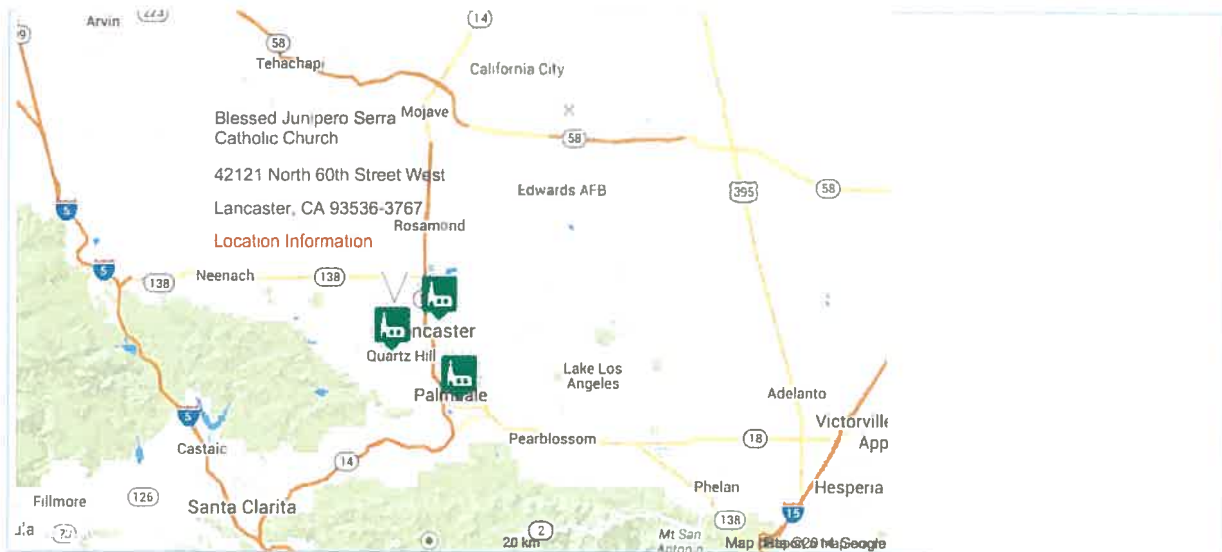
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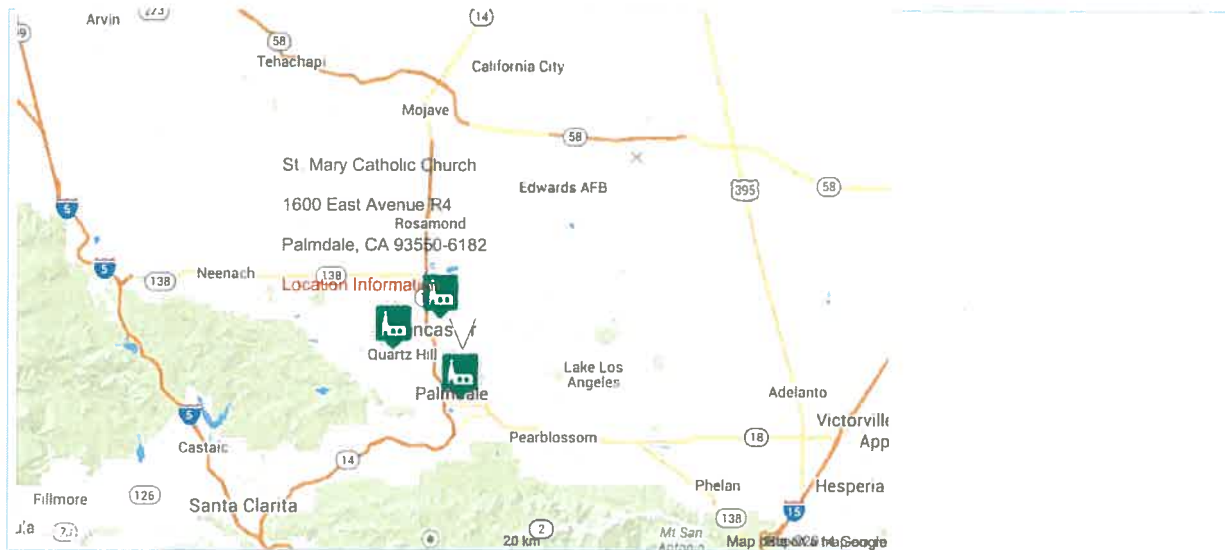
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The Archdiocese of Los Angeles Web Portal

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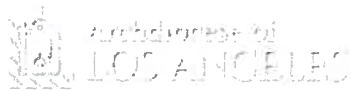
Location Map



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EXHIBIT E

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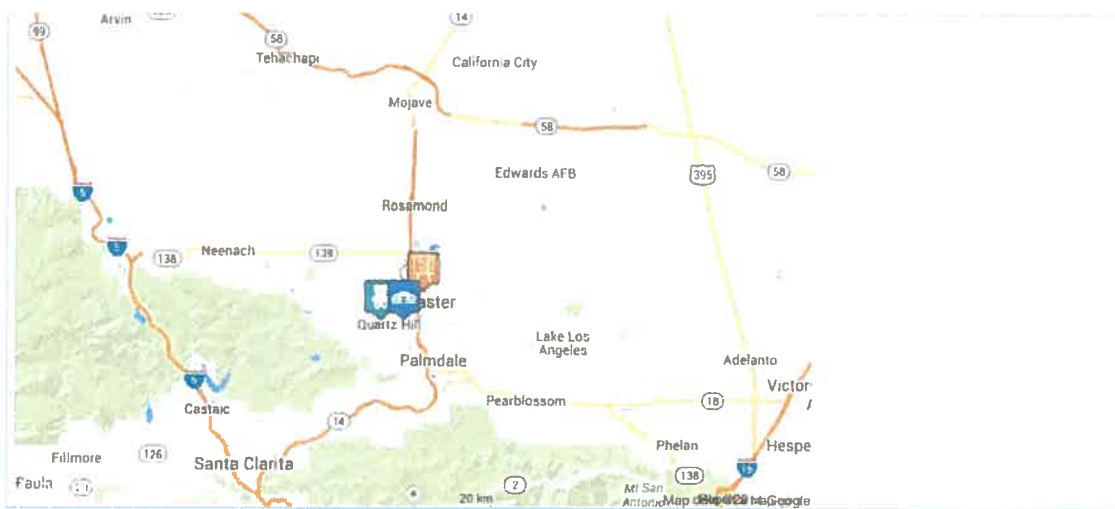
School Map

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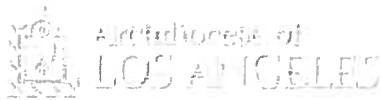
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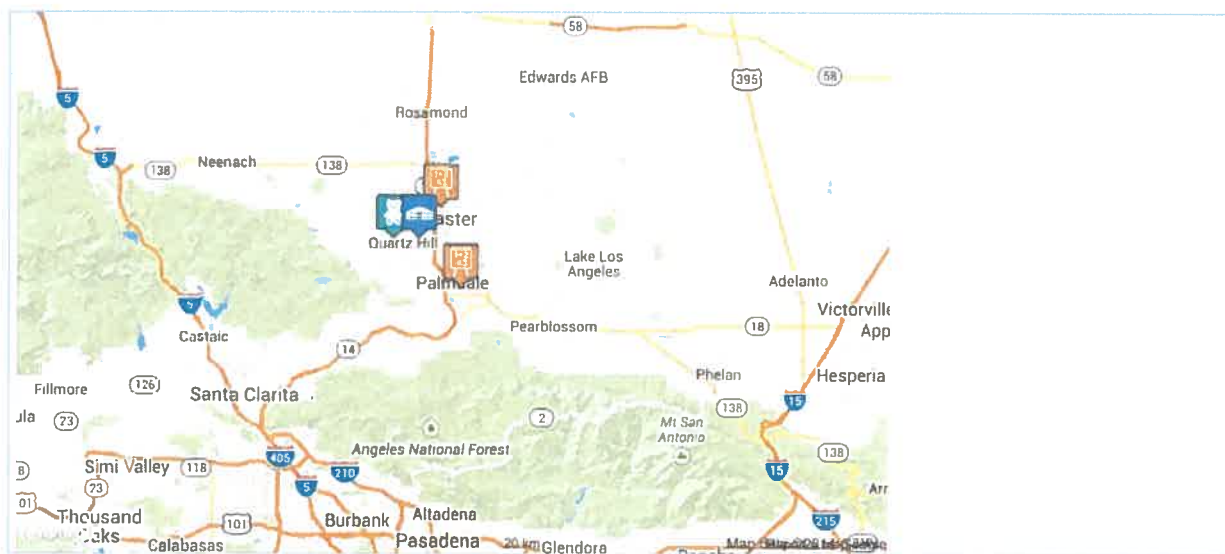
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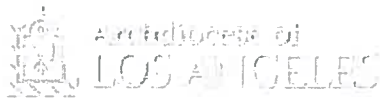
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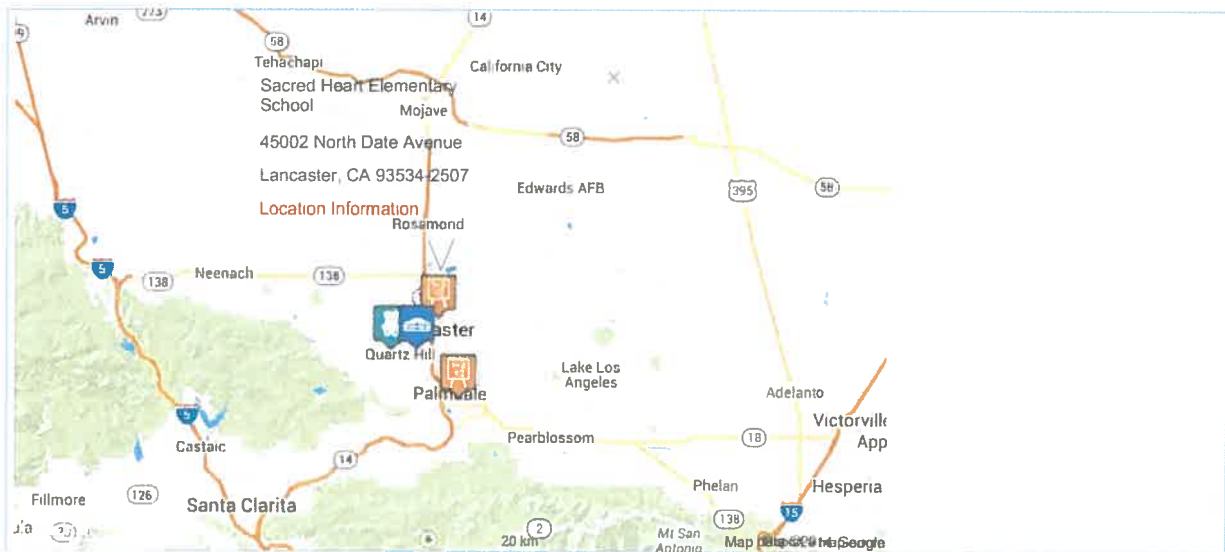
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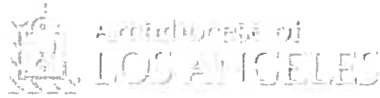
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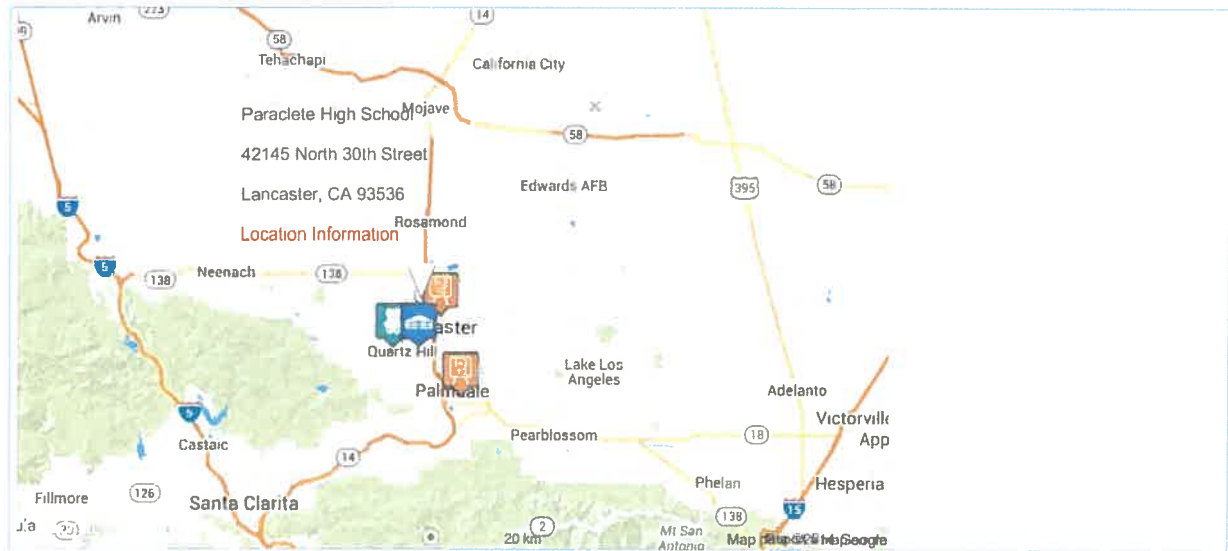
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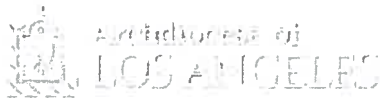
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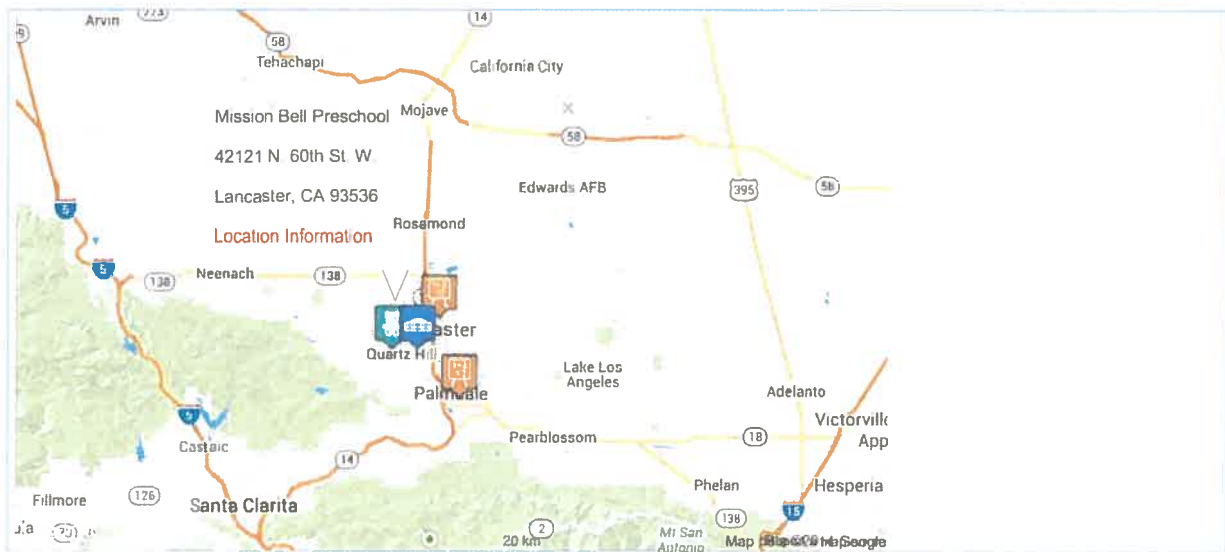
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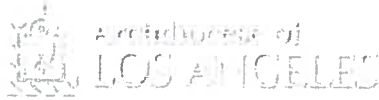
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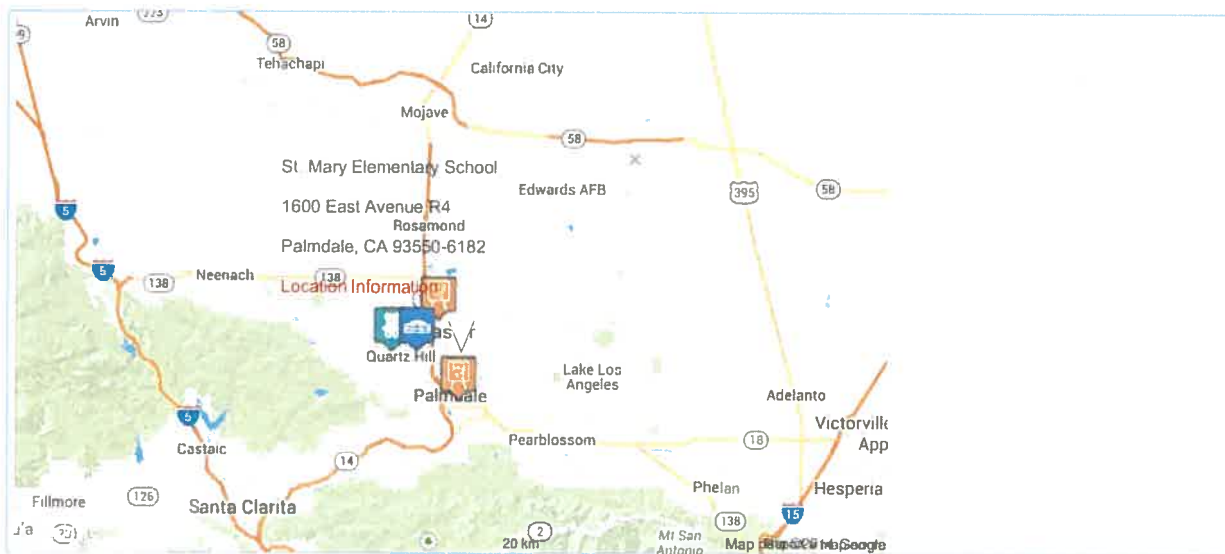
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EXHIBIT F

1 MR. DUNN: YES, WITH THE CLARIFICATION THAT ALL
2 NON-PRODUCERS WERE NOT NAMED AS PARTIES.

3 THE COURT: OKAY. THEY WERE NAMED AS DOE 107; IS
4 THAT CORRECT?

5 MR. KALFAYAN: NOT THE ARCHDIOCESE.

6 THE COURT: WELL, IN EFFECT, THEY APPEARED
7 HOWEVER, WHETHER THEY WERE NAMED OR NOT UNDER THE
8 FICTITIOUS NAME OF WESLEY PROPERTIES; TRUE?

9 MR. KALFAYAN: NO. IT WASN'T A FICTITIOUS NAME.
10 THE ARCHDIOCESE WAS NEVER SERVED NOR DID THEY APPEAR.
11 THE ONLY ANSWER WAS ON BEHALF OF MR. GRAF ON BEHALF OF
12 THAT LESLIE PROPERTY. IT'S NOT A FICTITIOUS NAME FOR
13 THE LEGAL ENTITY.

14 THE COURT: WHEN I SAY "FICTITIOUS," I MEAN
15 ERRONEOUSLY NAMED; TRUE?

16 MR. KALFAYAN: THERE WAS NO APPEARANCE ON BEHALF
17 OF THE ARCHDIOCESE ON BEHALF OF AN ERRONEOUSLY NAMED
18 ENTITY.

19 THE COURT: SHOULD THE COURT ENTER A JUDGMENT
20 AGAINST THE WESLEY PROPERTY AND ANYBODY ELSE THAT MIGHT
21 BE SO MISNAMED?

22 MR. KALFAYAN: IT CAN, YOUR HONOR. THE ENTITY,
23 THE ARCHDIOCESE ITSELF THOUGH WAS ALWAYS A PART OF THE
24 WILLIS CLASS. TO CURE ANY OF THAT, WE JUST DID THE
25 OPT-IN FORM.

26 THE COURT: HERE IS WHAT I AM GOING TO DO. I
27 WILL GRANT DAVID ESTRADA'S MOTION TO SUBSTITUTE. I WILL
28 DENY WITHOUT PREJUDICE THE ARCHDIOCESE. I THINK YOU

1 NEED TO JUMP THROUGH SOME HOOPS TO TAKE CARE OF THE
2 WESLEY ISSUE AS WELL AS TO OPT-IN SPECIFICALLY FOR THE
3 PROPERTIES THAT ARE CURRENTLY OWNED BY THE ARCHDIOCESE
4 IN THE ANTELOPE VALLEY.

5 I THINK WHAT YOU ALSO HAVE TO DO IS FILE
6 SOMETHING INDICATING THAT THE LESLIE PROPERTY IS NO
7 LONGER OWNED BY THE ARCHDIOCESE, AND LET THE NEW OWNERS
8 OF THAT BE AWARE OF THE STATUS OF THEIR PROPERTY.

9 MR. KALFAYAN: THAT IS FINE, YOUR HONOR. I WILL
10 DO THAT. AND THE DECLARATION THAT WE PROVIDED IN THE
11 REPLY BRIEF THOUGH, WE DID PROVIDE EVIDENCE THAT IT WAS
12 SOLD. AND WE DID PROVIDE EVIDENCE THAT THE ARCHDIOCESE
13 DID SELL THE PROPERTY.

14 THE COURT: THAT'S IN A BRIEF.

15 MR. KALFAYAN: RIGHT. SO IF THE COURT WANTS ME
16 TO FILE THE OPT-IN FORM AND FILE ANOTHER DECLARATION TO
17 SHOW THAT THE LESLIE PROPERTY WAS SOLD --

18 THE COURT: AND YOU NEED TO DISMISS THAT ANSWER.

19 MR. KALFAYAN: AND DISMISS THE ANSWER. THAT'S
20 FINE. SO SHOULD I FILE ANOTHER MOTION AND COME BACK
21 BEFORE THIS COURT IN ANOTHER MOTION OR JUST FILE THESE
22 PAPERS?

23 THE COURT: WHY DON'T WE CONTINUE THE HEARING ON
24 THIS MOTION TO ANOTHER TIME SO WE DON'T HAVE TO
25 RE-NOTICE IT. MY CONCERN IS THAT THIS CASE IS GOING TO
26 BE AROUND FOR MANY, MANY YEARS EVEN AFTER ANY POTENTIAL
27 JUDGMENT IS ENTERED. AND NONE OF US ARE GOING TO BE
28 HERE AT THAT TIME; I CAN MAKE THAT FORECAST REASONABLY.

1 MR. KALFAYAN: I AGREE WITH YOU, YOUR HONOR.

2 THE COURT: AND I THINK THE RECORD NEEDS TO BE
3 REAL CLEAR AS TO WHAT WE ARE DOING AND WHO IS DOING
4 WHAT.

5 MR. KALFAYAN: HENCE, YOUR HONOR, MY INTENT TO
6 BRING IN TWO CLASS REPS. BECAUSE MS. WILLIS DID SELL
7 HER PROPERTY. AND I AM CONCERNED THAT THE PUBLIC WATER
8 SUPPLIERS AND ASSUMED LAND OWNERS ARE GOING TO BE
9 PRESENTING YOU WITH A PROPOSED SETTLEMENT AGREEMENT THAT
10 I WILL BE FORCED TO APPEAR AND OBJECT TO. SO THE
11 IMPORTANCE OF HAVING AN INDIVIDUAL AND AN INSTITUTION AS
12 CLASS REPRESENTATIVE IS CRITICAL.

13 THE COURT: I UNDERSTAND. THIS IS A JUDGMENT IN
14 EQUITY THAT WILL BE AROUND FOR A LONG TIME. OKAY. I
15 WILL.

16 MR. KALFAYAN: I WILL FILE ANOTHER BRIEF IN THIS
17 MATTER AND FILE.

18 THE COURT: YOU CAN DETERMINE THE DATE BY FILING
19 IT. YOU WILL BE ABLE TO KNOW WHEN TO PICK A DATE WHEN
20 WE WILL DO SOMETHING ELSE HERE. AS A MATTER OF FACT,
21 YOU MIGHT CONSIDER THE 22ND OF DECEMBER, BECAUSE I KNOW
22 THERE IS A SUMMARY JUDGMENT THAT WILL BE HEARD IN
23 SAN JOSE AT NINE O'CLOCK THAT DAY.

24 MR. KALFAYAN: YOUR HONOR, JUST TO BE CLEAR THEN,
25 MR. ESTRADA IS A CLASS REPRESENTATIVE?

26 THE COURT: I GRANTED HIS REQUEST. THERE WAS NO
27 OBJECTION TO HIS APPLICATION.

28 MR. KALFAYAN: THANK YOU, YOUR HONOR.

PROOF OF SERVICE

I, Sandra Rosales, 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 December 8, 2014, I served the within document(s):

DECLARATION OF WENDY Y. WANG IN SUPPORT OF LOS ANGELES COUNTY
WATERWORKS DISTRICT NO. 40'S OPPOSITION TO WILLIS CLASS' RENEWED
MOTION TO ADD LEAD PLAINTIFF



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 December 8, 2014, at Los Angeles, California.


Sandra Rosales

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