

EXHIBIT 3

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

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**ANTELOPE VALLEY
GROUNDWATER CASES**

This Pleading Relates to Included Action:
REBECCA LEE WILLIS, on behalf of
herself and all others similarly situated,

Plaintiff,

v.

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; PHELAN PINON HILL
COMMUNITY SERVICE DISTRICT; and
DOES 1 through 1,000;
Defendants.

RELATED CASE TO JUDICIAL COUNCIL
COORDINATION PROCEEDING NO. 4408

The Honorable Jack Komar
Coordination Trial Judge

**REPLY DECLARATION OF THE
ARCHDIOCESE OF LOS ANGELES
RELATING TO THE "LESLIE PROPERTY"
IN SUPPORT OF RENEWED MOTION TO
ADD LEAD PLAINTIFF**

1 I, Michael T. Davitt, declare as follows:

2 1. I am employed as Director of Real Estate for the Archdiocese of Los Angeles (the
3 "Archdiocese"). The Archdiocese is a member of the *Willis* Class as defined in the judgment
4 dated September 22, 2011. I submit this Reply Declaration relating to the "Leslie Property" in
5 support of Plaintiff's Renewed Motion to Add Lead Plaintiff. I am over 18 years old and make
6 this statement based on my own personal knowledge. If called upon as a witness to testify to the
7 truth of the matters contained in this declaration, I would, and could, competently do so.

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9 2. I am aware that at the November 4, 2014, hearing in this matter, the Court requested
10 that the Archdiocese "let the owners of that [Leslie Property] be aware of the status of the
11 property." I am informed and believe that Allan J. Graf, outside counsel for the Archdiocese, has
12 informed the new owner of the Leslie Property that there is an ongoing groundwater adjudication
13 involving the water rights of landowners in the Antelope Valley. Mr. Graf further informed the
14 new owner that they should explore their water rights and potential involvement in the
15 adjudication based on whether the new owner has pumped or not pumped groundwater since
16 taking ownership of the Leslie Property.

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18 3. I am informed and believe that Mr. Graf informed the new owner of the Leslie Property
19 that on December 26, 2006, the "Leslie Property," designated as Doe Defendant no. 107 in the
20 Amendment to Complaint of plaintiff Los Angeles County Water Works District No. 40 and all
21 Cross-Complaints on file, answered the Complaint and Cross-Complaint. I have instructed our
22 attorneys in this matter, Krause, Kalfayan, Benink & Slavens, LLP, to file a Request to Dismiss
23 the Answer of the Leslie Property.

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1 I certify and declare under penalty of perjury under the laws of the United States that the
2 foregoing is true and correct.

3 Executed on December 15, 2014 at Los Angeles, California.
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5 THE ROMAN CATHOLIC ARCHDIOCESE OF
6 LOS ANGELES

7 By: Michael T. Davitt
8 Michael T. Davitt
9 Director of Real Estate
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