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DISTRICT NO. 40

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

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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

Judicial Council Coordination Proceeding
No. 4408

CLASS ACTION

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

**DECLARATION OF JEFFREY V.
DUNN IN SUPPORT OF PUBLIC
WATER SUPPLIERS' OPPOSITION
TO WILLIS CLASS SECOND
SUPPLEMENTAL MOTION FOR
ATTORNEY FEES,
REIMBURSEMENT OF EXPENSES,
AND CLASS REPRESENTATIVE
INCENTIVE AWARD**

*[Filed concurrently with Opposition to
Willis Class' Motion]*

Date: April 1, 2016
Time: 1:30 p.m.
Dept.: 1 (Santa Clara Superior)

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14 Water Company
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25 CALIFORNIA WATER SERVICE COMPANY
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1 I, Jeffrey V. Dunn, declare as follows:

2 1. I am a partner with the law firm of Best Best & Krieger LLP, counsel for
3 defendant Los Angeles County Waterworks District No. 40 ("District 40"). I have personal
4 knowledge of the facts stated herein and, if called upon to do so, I could testify to these facts.

5 2. Attached hereto as Exhibit "A" is a true and correct copy of the minute order dated
6 June 15, 2015.

7 3. Attached hereto as Exhibit "B" is a true and correct copy of the Willis Class'
8 Notice and Motion to Obtain Court Order Permitting Willis Class Counsel to Seek Additional
9 Attorneys' Fees, dated March 4, 2015.

10 4. Attached hereto as Exhibit "C" is a true and correct copy of the minute order dated
11 March 26, 2015.

12 5. Attached hereto as Exhibit "D" is a true and correct copy of the Willis Class'
13 Reply in Support of its Renewed Motion to Add Lead Plaintiff.

14 6. Attached hereto as Exhibit "E" is a true and correct copy of the Willis Class'
15 Notice of Appeal, dated February 19, 2016, without the attachments.

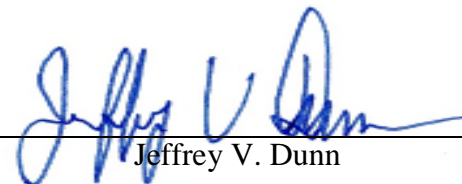
16 7. On or about March 10, 2016, my office conducted a search of the Court's website
17 for the above captioned matter for postings made by the Willis Class concerning the physical
18 solution. Attached hereto as Exhibit "F" is a true and correct copy of a print-out from the Court's
19 website with postings made by the Willis Class concerning physical solution highlighted in
20 yellow.

21 8. On or about March 10, 2016, my office conducted a search of the Court's website
22 for the above captioned matter for postings made by the Willis Class concerning the settlement.
23 Attached hereto as Exhibit "G" is a true and correct copy of a print-out from the Court's website
24 with postings made by the Willis Class to enforce its settlement with the Public Water Suppliers
25 highlighted in yellow.

26 9. Attached hereto as Exhibit "H" is a true and correct copy of the Willis Class'
27 Disclosure of Witnesses and Exhibits Pursuant to Second Amended Case Management Order
28 Dated March 27, 2015.

1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct. Executed this 15th day of March, 2016, at Irvine, California.

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Jeffrey V. Dunn

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 S. Grand Avenue, 25th Floor, Los Angeles, California 90071. On March 15, 2016, I served the following document(s):

DECLARATION OF JEFFREY V. DUNN IN SUPPORT OF PUBLIC WATER SUPPLIERS' OPPOSITION TO WILLIS CLASS SECOND SUPPLEMENTAL MOTION FOR ATTORNEY FEES, REIMBURSEMENT OF EXPENSES, AND CLASS REPRESENTATIVE INCENTIVE AWARD



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 March 15, 2016, at Los Angeles, California.


Sandra Rosales

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