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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 FOR THE COUNTY OF LOS ANGELES  
10

11 ANTELOPE VALLEY  
12 GROUNDWATER CASES

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

16 *Plaintiffs,*

17 v.

18 LOS ANGELES COUNTY  
19 WATERWORKS DISTRICT NO. 40;  
20 CITY OF LANCASTER; CITY OF  
PALMDALE; PALMDALE WATER  
21 DISTRICT; LITTLEROCK CREEK  
IRRIGATION DISTRICT; PALM  
22 RANCH IRRIGATION DISTRICT;  
QUARTZ HILL WATER DISTRICT;  
23 ANTELOPE VALLEY WATER CO.;  
ROSAMOND COMMUNITY SERVICE  
24 DISTRICT; PHELAN PINON HILL  
COMMUNITY SERVICE DISTRICT; and  
25 DOES 1 through 1,000;

26 *Defendants.*  
27  
28

RELATED CASE TO JUDICIAL COUNCIL  
COORDINATION PROCEEDING NO. 4408

The Honorable Jack Komar  
Coordination Trial Judge

**SECOND REPLY DECLARATION OF THE  
ARCHDIOCESE OF LOS ANGELES  
RELATING TO THE "LESLIE PROPERTY"  
AND RETENTION OF KRAUSE KALFAYAN  
IN SUPPORT OF RENEWED MOTION TO  
ADD CLASS REPRESENTATIVE**

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

3 1. I am employed as Director of Real Estate for the Archdiocese of Los Angeles (the  
4 "Archdiocese"). The Archdiocese is a member of the *Willis* Class as defined in the judgment  
5 dated September 22, 2011. I submit this Second Reply Declaration relating to the "Leslie  
6 Property" and the Archdiocese' Retention of Krause Kalfayan in support of Plaintiffs' Renewed  
7 Motion to Add Class Representative. I am over 18 years old and make this statement based on  
8 my own personal knowledge. If called upon as a witness to testify to the truth of the matters  
9 contained in this declaration, I would, and could, competently do so.  
10

11 2. I am aware that at the November 4, 2014, hearing in this matter, the Court requested  
12 that the Archdiocese "let the owners of that [Leslie Property] be aware of the status of the  
13 property." I informed G. Richard Green, attorney for the new owner of the Leslie Property,  
14 Renaissance Group, LLC, that there is an ongoing groundwater adjudication involving the water  
15 rights of landowners in the Antelope Valley. I further informed the attorney for the new owner  
16 that the new owner should explore its potential involvement in the Antelope Valley Groundwater  
17 adjudication based on whether the new owner has pumped or not pumped groundwater since  
18 taking ownership of the Leslie Property.  
19

20 3. I informed the attorney for the new owner of the Leslie Property that on December 26,  
21 2006, the "Leslie Property," designated as Doe Defendant no. 107 in the Amendment to  
22 Complaint of plaintiff Los Angeles County Water Works District No. 40 and all Cross-  
23 Complaints on file, answered the Complaint and Cross-Complaint. I instructed our attorneys in  
24 this matter, Krause, Kalfayan, Benink & Slavens, LLP, to file a Request to Dismiss the Answer of  
25 the Leslie Property on behalf of the Archdiocese of Los Angeles and it is my understanding that  
26 the Request to Dismiss was granted by the Court on January 22, 2015.  
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28

1           4. The Archdiocese has agreed to serve as a named class representative for the purpose  
2 of enforcing the Willis Class Judgment on behalf of absent class members, including other  
3 corporations, who own property in the Antelope Valley but have not pumped any groundwater  
4 yet. I understand the requirements of serving as a class representative and voluntarily undertake  
5 the burdens associated with the role of class representative. We retained Krause Kalfayan Benink  
6 & Slavens, LLP ("KKBS") to act as our counsel because they already are Class Counsel for the  
7 Willis Class. The Archdiocese expects to be an active participant in enforcing the Willis  
8 Judgment along with David Estrada. KKBS did not ask as the Archdiocese to merely lend the  
9 Archdiocese' name to this lawsuit, nor would we permit KKBS to do so. To reiterate, the  
10 Archdiocese has a significant interest in seeing that its properties and those properties belonging  
11 to absent class members include the right to pump groundwater, just as other currently pumping  
12 landowners have the right to do. Otherwise, the value of our properties and the absent class  
13 members' properties will essentially be worthless because we will need groundwater to develop  
14 the land. We intend to work with KKBS as a class representative to ensure that the Willis  
15 Judgment, which included a right to pump groundwater in the future, is incorporated into the  
16 physical solution adopted by the Court.

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18  
19           I certify and declare under penalty of perjury under the laws of the State of California that  
20 the foregoing is true and correct.

21  
22           Executed on March 18, 2015 at Los Angeles, California.

23                               THE ROMAN CATHOLIC ARCHDIOCESE OF  
24                               LOS ANGELES

25                               By:   
26                               Michael T. Davitt  
27                               Director of Real Estate  
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