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9 Class Counsel for the Willis Class

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

10 **ANTELOPE VALLEY**  
11 **GROUNDWATER CASES**

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

16 *Plaintiffs,*

17 v.

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

*Defendants.*

RELATED CASE TO JUDICIAL COUNCIL  
COORDINATION PROCEEDING NO. 4408

**ADDENDUM TO WILLIS CLASS' CASE  
MANAGEMENT STATEMENT**

Date: May 15, 2015  
Time: 1:30 pm  
Place: Court Call - Telephonic  
Judge: Hon. Jack Komar

1 The Willis Class respectfully submits the following Addendum to Case Management  
2 Conference Statement in advance of the May 15, 2015, status conference.

3 Without waiving the right to present the Alternative Proposed Physical Solutions ("APPS")  
4 at trial and without waiving any correlative rights of the Willis Class, Willis Class Counsel hereby  
5 informs the Court of their intent to present evidence at trial relating to a proposal for an allocation  
6 of a fair portion of the NSY to the Willis Class. This proposal will address practical concerns such  
7 as how to apportion the allocated NSY amongst Willis Class Members as they come "online," fair  
8 and equitable steps for obtaining a permit to build a well to pump groundwater, and how to address  
9 any additional cutbacks necessary in the future if the NSY is determined to be lower than the NSY  
10 established by the Court thus far.

11  
12 This proposal will be presented at trial without waiving the Willis Class' argument that a  
13 Court-appointed expert should have been appointed to assist the Court in addressing the future  
14 groundwater use by Willis Class Members. The Court and the 3100-Member Wood Class has had  
15 the benefit of a Court-appointed expert and the 65,000-Member Willis Class deserves no less. In  
16 order to fulfill their fiduciary duty to the Willis Class Members, Willis Class Counsel has retained  
17 experts to opine on issues relating to the incorporation of the Willis Class' rights into a Physical  
18 Solution. The Willis Class will soon file a Motion for an Order for Payment of Expert Fees to  
19 cover the costs of these experts, all of whom are absolutely necessary to vindicate the rights of the  
20 Willis Class during the upcoming Physical Solution proceedings.

21 Dated: May 14, 2015

KRAUSE KALFAYAN  
BENINK & SLAVENS, LLP

22  
23 By: 

Ralph B. Kalfayan, Esq.  
Lynne M. Brennan, Esq.  
Class Counsel for the Willis Class

**PROOF OF SERVICE**

I, Lynne M. Brennan, declare:

I am a citizen of the United States and employed in San Diego County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is Krause Kalfayan Benink & Slavens, LLP 550 West C Street, Suite 530, San Diego, California 92101. On May 14, 2015, I caused the following document(s):

**ADDENDUM TO WILLIS CLASS' CASE MANAGEMENT STATEMENT**

to be served on the parties in this action, as follows:

☒ (BY ELECTRONIC SERVICE) by posting the document(s) listed above to the Santa Clara County Superior Court website: [www.scefiling.org](http://www.scefiling.org) regarding the Antelope Valley Groundwater matter.

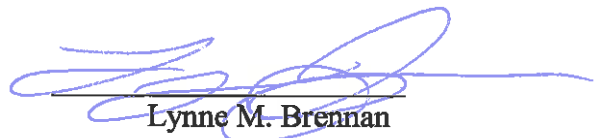
☐ (BY U.S. Mail) I am readily familiar with the firm's practice of collection and processing of documents for mailing. Under that practice, the above-referenced documents(s) were placed in sealed envelope(s) addressed to the parties as noted above, with postage thereon fully prepaid and deposited such envelope(s) with the United States Postal Service on the same date at San Diego, California, addressed to:

☐ (BY FEDERAL EXPRESS) I served a true and correct copy by Federal Express or other overnight delivery service, for the delivery on the next business day. Each copy was enclosed in an envelope or package designed by the express service carrier; deposited in a facility regularly maintained by the express service carrier or delivered to a courier or driver authorized to receive documents on its behalf; with delivery fees paid or provided for; addressed as shown on the accompanying service list.

☐ (BY FACSIMILE TRANSMISSION) I am readily familiar with the firm's practice of facsimile transmission of documents. It is transmitted to the recipient on the same day in the ordinary course of business.

☒ (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

☐ (FEDERAL) I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

  
Lynne M. Brennan