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

**ANTELOPE VALLEY
GROUNDWATER CASES**

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

Plaintiffs,

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

**WILLIS CLASS' NOTICE OF INTENT TO
APPEAR AND BE HEARD**

Date: August 3, 2015

Time: 9:00 AM

Place: Santa Clara County Superior Court,
191 N. 1st St., San Jose, CA 95113, Dept. 1

Judge: Hon. Jack Komar

1 **TO THE COURT, WOOD CLASS COUNSEL, AND LIAISON COUNSEL FOR**
2 **SETTLING DEFENDANTS:**

3 **PLEASE TAKE NOTICE** that on August 3, 2015 at 9:00 am or as soon thereafter as the
4 matter may be heard, before the Honorable Judge Komar, Santa Clara County Superior Court, 191
5 N. 1st St., San Jose, CA 95113, Department 1, the undersigned law firm, Class Counsel for the
6 Willis Class, intends to appear and be heard on the Willis Class' objections to the Wood Class
7 Settlement and the illegally incorporated proposed physical solution.
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9 **BRIEF STATEMENT OF OBJECTIONS TO WOOD CLASS SETTLEMENT AND**
10 **ILLEGALLY INCORPORATED PROPOSED PHYSICAL SOLUTION**

11 The Willis Class' Objections to the Wood Class Settlement and illegally incorporated
12 proposed physical solution are set forth fully in the Willis Class' Opposition to Motion for
13 Preliminary Approval of Wood Class Settlement, Alternative Proposed Physical Solutions,
14 Separate Statement of Objections, and Declaration of Ralph B. Kalfayan in Support Thereof, filed
15 on March 13, 2015, and fully incorporated herein by this reference.
16

17 In brief, the Willis Class intends to appear and be heard on its previously-filed objections
18 as follows: The Willis Class objects to the Wood Class Stipulation of Settlement which
19 incorporates the Stipulation for Entry of Judgment and Proposed Physical Solution (hereinafter
20 collectively "SPPS") on the following grounds: the SPPS (1) conflicts with the terms of the
21 Willis Stipulation of Settlement and Final Amended Judgment entered by this Court on
22 September 22, 2011; (2) extinguishes the rights of and prejudices the Willis Class, a non-
23 Stipulating Party to the SPPS, which owns 65,000 parcels of land in the Antelope Valley or over
24 60% of the Basin; (3) denies the due process rights of the Willis Class Members; (4) violates the
25 California Constitution; (5) is inconsistent with California Water Code sections 106 and 106.3;
26 (6) contravenes established common law; (7) imposes an undue financial burden on Willis Class
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1 Members; and (8) unjustly discriminates against the Willis Class.

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3 Dated: May 14, 2015

KRAUSE KALFAYAN
BENINK & SLAVENS, LLP

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6 By: 

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

PROOF OF SERVICE

I am employed with the LAW OFFICES OF KRAUSE, KALFAYAN, BENINK & SLAVENS, LLP, whose address is 550 West C Street, Suite 530, San Diego, California, 92101; I am not a party to this cause. I am over the age of eighteen years.

I further declare that on **May 14, 2015**, I served a copy of the following document(s):

1. WILLIS' CLASS NOTICE OF INTENT TO APPEAR AND BE HEARD

on the interested parties listed below:

Michael D. McLachlan, Esq.
Law Offices of Michael D. McLachlan
44 Hermosa Avenue
Hermosa Beach, CA 90254
mike@mclachlan-law.com

Class Counsel

Jeffrey V. Dunn, Esq.
Best Best & Krieger LLP
18101 Von Karman Avenue, Suite 1000
Irvine, CA 92614
jeffrey.dunn@bbklaw.com

Liaison Counsel
for Defendants

☐ **BY FIRST CLASS MAIL.** I served the documents by enclosing them in a sealed envelope or package with postage pre-paid addressed to the persons at the addresses above and placing the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service. The envelope or package was placed in the mail at San Diego, CA.

☒ **BY ELECTRONIC SERVICE.** Based upon court order or an agreement of the parties to accept service by electronic transmission, by electronically mailing the document(s) listed above to the e-mail address(es) above.


☒ **BY FEDERAL EXPRESS MAIL.** I enclosed the documents in an envelope or package provided by Federal Express and addressed to the persons as listed above. I placed the envelope or package for collection and overnight delivery at an office or a regularly utilized Federal Express drop box.

☐ **BY FACSIMILE.** The person whose name appears above, was faxed a copy of said document(s) by facsimile transmission. No error was reported by the fax machine I used.

1 [] **BY ELECTRONIC FILING.** I hereby certify that the document(s) listed above
2 were filed through the Court's ECF system and have been sent electronically to all parties registered
3 for electronic filing in this action specifically listed below.

4 I declare under penalty of perjury under the laws of the State of California that the foregoing
5 is true and correct.

6 Executed on **May 14, 2015**


Cindy Barba