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Class Counsel for the Willis Class

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

**DECLARATION OF LYNNE M. BRENNAN IN
SUPPORT OF WILLIS CLASS' MOTION TO
ENFORCE SETTLEMENT AGREEMENT
WITH DEFENDANT PUBLIC WATER
SUPPLIERS; MOTION TO ENFORCE DUE
PROCESS RIGHTS OF THE WILLIS CLASS;
MOTION FOR COURT ORDER FOR
PAYMENT OF EXPERT WITNESS FEES
FOR THE WILLIS CLASS FOR PHYSICAL
SOLUTION PROCEEDINGS**

Date: June 15, 2015

Time: 10:00 AM

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

Judge: Hon. Jack Komar

**DECLARATION OF LYNNE M. BRENNAN IN SUPPORT OF WILLIS CLASS' MOTION TO ENFORCE
DUE PROCESS RIGHTS OF THE WILLIS CLASS; MOTION TO ENFORCE SETTLEMENT
AGREEMENT WITH DEFENDANT PUBLIC WATER SUPPLIERS; MOTION FOR COURT ORDER
FOR PAYMENT OF EXPERT WITNESS FEES FOR THE WILLIS CLASS FOR PHYSICAL SOLUTION
PROCEEDINGS**

1 I, Lynne M. Brennan, declare:

2 1. I have personal knowledge of the facts below, and if called upon to do so, I could and
3 would testify competently thereto in a court of law.

4 2. I am an attorney licensed to practice law in the State of California. I am Of Counsel to
5 law firm of Krause, Kalfayan, Benink & Slavens, LLP, Class Counsel and attorneys of record for
6 the Willis Class.

7 3. Attached as Exhibit A to the Motion to Enforce Settlement Agreement with Public Water
8 Suppliers ("Motion to Enforce Settlement Agreement") is a true and correct copy of relevant
9 excerpts from the Willis Settlement Agreement dated July 13, 2010.

10 4. Attached as Exhibit B to the Motion to Enforce Settlement Agreement is a true and correct
11 copy of relevant excerpts from the Willis Amended Final Judgment dated September 22, 2011.

12 5. Attached as Exhibit C to the Motion to Enforce Settlement Agreement is a true and correct
13 copy of relevant excerpts from the Stipulation of Judgment and Proposed Physical Solution
14 ("SPPS") filed with the Court on March 4, 2015.

15 6. Attached as Exhibit D to the Motion to Enforce Settlement Agreement is a true and correct
16 copy of relevant excerpts from the Order Transferring and Consolidating Actions for All Purposes
17 dated February 19, 2010.

18 7. Attached as Exhibit E to the Motion to Enforce Settlement Agreement is a true and correct
19 copy of relevant excerpts from Order Awarding Attorneys' Fees dated June 4, 2011.

20 8. Attached as Exhibit A to the Motion to Enforce Due Process Rights of the Willis Class is
21 a true and correct copy of relevant excerpts from the Stipulation of Judgment and Proposed Physical
22 Solution ("SPPS") filed with the Court on March 4, 2015.

1 9. Attached as Exhibit B to the Motion to Enforce Due Process Rights of the Willis Class is
2 a true and correct copy of the Willis Class Action Notice dated December 17, 2008.

3 10. Attached as Exhibit C to the Motion to Enforce Due Process Rights of the Willis Class is
4 a true and correct copy of the Willis Class Action Settlement Notice dated December 2010.

5 11. Attached as Exhibit D to the Motion to Enforce Due Process Rights of the Willis Class is
6 a true and correct copy of relevant excerpts from the Order Transferring and Consolidating Actions
7 for All Purposes dated February 19, 2010.

8 12. Attached as Exhibit E to the Motion to Enforce Due Process Rights of the Willis Class is
9 a true and correct copy of relevant excerpts from the Willis Amended Final Judgment dated
10 September 22, 2011.

11 13. Attached as Exhibit F to the Motion to Enforce Due Process Rights of the Willis Class is a
12 true and correct copy of relevant excerpts from the Willis Settlement Agreement dated July 13,
13 2010.

14 14. Attached as Exhibit A to the Order for Payment of Expert Witness Fees for the Willis Class
15 for the Physical Solution Proceedings is a true and correct copy of the Willis Class' Estimated
16 Budget for Expert Witness Fees.

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

19 Executed on May 21, 2015 at San Diego, California.

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24 By: 

25 Lynne M. Brennan
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