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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  
15 ESTRADA, on behalf of themselves and  
all others similarly situated,

16 *Plaintiffs,*

17 v.  
18

19 LOS ANGELES COUNTY  
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

**REPLY DECLARATION OF LLOYD E.  
LEWIS IN SUPPORT OF WILLIS CLASS'  
MOTION TO ENFORCE SETTLEMENT  
AGREEMENT WITH DEFENDANT PUBLIC  
WATER SUPPLIERS AND MOTION TO  
ENFORCE DUE PROCESS RIGHTS OF THE  
WILLIS CLASS**

Date: June 15, 2015

Time: 1:30 PM

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

Judge: Hon. Jack Komar

1 I, Lloyd E. Lewis, declare:

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

4 2. I contacted the law offices of Krause Kalfayan Benink & Slavens, LLP in late April  
5 2015 because I had been informed that Ralph Kalfayan represented the Willis Class or  
6 landowners who had not yet pumped groundwater in the Antelope Valley. I wanted to get more  
7 information from Mr. Kalfayan's law office regarding the status of the Antelope Valley  
8 Groundwater Litigation and the rights of Willis Class Members to obtain a well permit to pump  
9 groundwater.  
10

11 3. I joined the Farm Bureau in Antelope Valley in 2014 because I was interested in  
12 buying 10 acres of land from a Willis Class Member, Ms. Maria Banilla. I currently lease the 10  
13 acres of land with an option to purchase. I was in the process of buying the 10 acres -- four 2 ½  
14 acre plots -- from Ms. Banilla for a total of \$8000 (\$800 per acre) when my due diligence  
15 uncovered a problem with the ongoing water adjudication in the AV Basin. I wanted to become a  
16 small "beginning" farmer in the area of hydroponics/agriculture and wanted to invest in facilities  
17 and land in the Antelope Valley.  
18

19 4. More specifically, I planned to use the purchased land in the Antelope Valley to assist  
20 disadvantaged youth in the community by teaching them how to farm. I grew up in foster care  
21 and instead of getting into trouble with the law, I was extremely fortunate to have been a part of a  
22 program that taught teenagers basic skills relating to planting, growing, and harvesting food. The  
23 sense of accomplishment I felt in learning these farming skills changed the course of my life for  
24 the better. I now am retired from working with disadvantaged youth in group home settings and I  
25 wanted to now focus my efforts in helping disadvantaged youth learn basic farming skills just as I  
26 had been helped in my youth. I also am involved in veteran support groups and nonprofits such  
27

28 **REPLY DECLARATION OF LLOYD E. LEWIS IN SUPPORT OF WILLIS CLASS' MOTION TO  
ENFORCE SETTLEMENT AGREEMENT WITH DEFENDANT PUBLIC WATER SUPPLIERS AND  
MOTION TO ENFORCE DUE PROCESS RIGHTS OF THE WILLIS CLASS**

1 as Archie's Acres in Escondido, California. Archie's Acres helps U.S. Veterans returning from  
2 wars overseas, including Afghanistan and Iraq, to establish alternative careers in the agricultural  
3 or farming industry. In addition to the 10 acre parcel of land, in 2014 I became interested in  
4 buying an undeveloped 80-acre parcel of land in the Antelope Valley. I planned to expand the  
5 program run by Archie's Acres by using the 80 acres of land to help rebuild the lives of returning  
6 U.S. War Veterans by teaching them basic farming skills.

8 5. In 2014, I learned that I would need to obtain a permit to build a well to pump  
9 groundwater from the land I wanted to buy. The cost of the well for the 10 acre property was  
10 estimated at \$20,000. When I started asking around about obtaining a well permit, I started  
11 hearing about an "adjudication" that would affect my ability to pump groundwater from the land I  
12 was about to purchase. I spoke with Mr. McLachlan, Counsel for the Small Pumper Class, in  
13 March 2015 and was told that "if you [Lloyd] could find land elsewhere, it would be better."

15 6. I also spoke to Mr. Norm Hickling in County Supervisor Michael Antonovich's office  
16 in early August 2014 and was told that unless I got a well permit within the 10 days before the  
17 next Court hearing in mid-August, I would not be able to get a well permit after that time. Mr.  
18 Hickling specifically advised me not to proceed with my purchase of land in the Antelope Valley  
19 or my intent to build a well to pump groundwater.

21 7. In or around August 2014, I retained a well permit consultant referred to me by the  
22 Water District to assist me in the well permit application process. After conducting her due  
23 diligence, the well permit consultant also advised me not to buy the 10 acres of property because I  
24 would not be able to obtain a permit from the County to build a well to pump groundwater on the  
25 property within the time period Mr. Hickling had given me. Without the ability to build a well  
26 and pump groundwater, the 10 acre property that I wanted to purchase had no value because I  
27 would not be able to develop the land.

1 8. I currently am a regular attendee at the Farm Bureau meetings in Antelope Valley. On  
2 April 28, 2015, Mr. Nebeker, the Head of the Farm Bureau, announced to the meeting attendees  
3 that the nonpumping landowners in the Antelope Valley were "not getting anything" as far as  
4 groundwater in the adjudication. Mr. Nebeker also told the attendees that the "only ones" getting  
5 groundwater were the Large Pumpers and Small Pumpers, that the "Willis Class was left out  
6 altogether," that the "Willis Class was getting no relief at all," and that it "was over" for the  
7 Willis Class. I am a "let's all get along" type of guy, so I kept trying to work with pumping  
8 landowners, large and small, to negotiate an "exemption" of some sort for a small farmer like  
9 me. I have not yet succeeded.  
10

11 9. As a result of my conversations with Mr. Nebeker, Mr. Hickling, Mr. McLachlan, and  
12 the well permit consultant, I decided not to purchase the 10 acres at this time. Instead, I agreed to  
13 pay a portion of back taxes owed on one of the 2 1/2 plots and obtain a lease with an option to  
14 purchase the 10 acres if I become satisfied that I will be able to build a well and pump  
15 groundwater for the property. I also am still very interested in buying the 80 acre parcel of land  
16 if I am assured that I will be able to build a well and pump groundwater for that property.  
17

18 10. I wish I had known earlier that there were attorneys actually trying to protect the  
19 rights of the nonpumping landowners and that I could file objections with the Court to the deal  
20 that has been struck by the pumping landowners and the Public Water Suppliers to take away the  
21 Willis Class' right to pump groundwater.  
22

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

25 Executed on June 5, 2015 at Downey, California.

26 By: 

27 Lloyd E. Lewis  
28

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