

1 Ralph B. Kalfayan (SBN 133464)
2 Lynne M. Brennan (SBN 149131)
3 KRAUSE KALFAYAN BENINK &
4 SLAVENS, LLP
5 550 West C Street, Suite 530
6 San Diego, CA 92101
7 Tel: (619) 232-0331
8 Fax: (619) 232-4019

9 Class Counsel for the Willis Class

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
**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 CINDY BARBA IN
SUPPORT OF WILLIS CLASS' MOTION TO
WITHDRAW BASED ON CONFLICT OF
INTEREST OR, IN THE ALTERNATIVE,
MOTION FOR CONTINUANCE OF THE
PHASE VI PHYSICAL SOLUTION TRIAL**

Date: August 3, 2015
Time: 10:00 A.M.
Place: Los Angeles Superior Court
111 North Hill Street, Dept. 1
Los Angeles, CA 90012
Judge: Hon. Jack Komar

1 I, Cindy Barba, declare:

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

4 2. I am a paralegal in the law firm of Krause Kalfayan Benink & Slavens, LLP, Class
5 Counsel and attorneys of record for the Willis Class.

6
7 3. In the course of performing my duties at the law firm, I was asked by Mr. Kalfayan
8 and Ms. Brennan to review and compare the Wood Class list of class members (emailed by Mr.
9 McLachlan to Mr. Kalfayan on June 19, 2015) to the Willis Class list contained in the
10 avgroundwater.com (Willis Class) website and related database. The printed Wood Class list
11 totaled 79 pages. The Willis Class list and database contains 18,750 names. It is my understanding
12 the avgroundwater.com website and related Willis Class database is administered and maintained
13 by the law firm of Best Best & Krieger.

14
15 4. The comparison of Class lists is very detailed, time-intensive, and laborious and is
16 still ongoing. Thus far, I have compared pages 1 to 16 of the Wood Class list to the Willis Class
17 list. If I found a Wood Class Member who is also a member in the Willis Class list, then I marked
18 that name with a "yes." If the Wood Class Member was not on the Willis Class list, then I marked
19 the name with a "no." I also made sure that all persons marked with a "yes" had the same address
20 on both the Willis Class and Wood Class list, just to be sure that I have the correct person in both
21 lists. The vast majority of the addresses matched up.

22
23 5. In comparing the first 16 pages of the Wood Class list, I counted a total of 916 Wood
24 Class Members. Out of the 916 names, I marked 713 with a "yes" and 203 with a "no." Therefore,
25 approximately 78% of the Wood Class Members that I compared are also on the Willis Class list.

26 6. I also was asked to confirm whether Wood Class Member Olaf Landsgaard is on
27
28

1 both the Willis and Wood Class Lists. I was able to confirm that in fact Mr. Landsgaard is on both
2 the Willis and Wood Class list.

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

5 Executed on July 10, 2015 at San Diego, California.

6
7
8 By: Cindy Barba
9 Cindy Barba