

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

5 Class Counsel for the Willis Class
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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 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
all others similarly situated,

15 *Plaintiffs,*

16 v.

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

25 *Defendants.*
26

27 I, Robin Griffin, declare:
28

RELATED CASE TO JUDICIAL COUNCIL
COORDINATION PROCEEDING NO. 4408

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

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

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

12 4. Thus far, I have compared pages 43 to 51 of the Wood Class list to the Willis Class
13 list. If I found a Wood Class Member who is also a Member in the Willis Class list, then I marked
14 that name with a "yes." If the Wood Class Member was not on the Willis Class list, then I marked
15 the name with a "no." I also made sure that all persons marked with a "yes" had the same address
16 on both the Willis Class and Wood Class list just to be sure that I have the correct person in both
17 lists. The vast majority of the addresses matched up.

18 5. In comparing pages 43-51 of the Wood Class list, I counted a total of 456 Wood
19 Class Members. Out of the 456 names, I marked 332 with a "yes" and 124 with a "no." Therefore,
20 approximately 73% of the Wood Class Members that I compared are also on the Willis Class list.

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

23 Executed on July 10th, 2015 at San Diego, California.

24
25 By: 
26 Robin Griffin