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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' SECOND
MOTION TO ENFORCE SETTLEMENT
AGREEMENT WITH DEFENDANT
PUBLIC WATER SUPPLIERS**

Date: August 4, 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, Lynne M. Brennan, declare:

2 1. I have personal knowledge of the facts below, and if called upon to do so, I could
3 and 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
5 to law firm of Krause, Kalfayan, Benink & Slavens, LLP, Class Counsel and attorneys of record
6 for the Willis Class.

7 3. Attached as Exhibit A to the Willis Class' Second Motion to Enforce Settlement
8 Agreement with Public Water Suppliers ("Second Motion to Enforce Settlement Agreement") is a
9 true and correct copy of the Willis Stipulation of Settlement ("Settlement Agreement") dated July
10 13, 2010.

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

13 5. Attached as Exhibit C to the Second Motion to Enforce Settlement Agreement is a
14 true and correct copy of the Stipulation of Judgment and Proposed Physical Solution ("SPPS") filed
15 with the Court on March 4, 2015, plus Exhibits 3 and 4.

16 6. Attached as Exhibit D to the Second Motion to Enforce Settlement Agreement is a
17 true and correct copy of the Expert Report of Rodney T. Smith, Ph.D.

18 7. Attached as Exhibit E to the Second Motion to Enforce Settlement Agreement is a true
19 and correct copy of the Expert Report of Brian E. Gray.

20 8. Attached as Exhibit F to the Second Motion to Enforce Settlement Agreement is a
21 true and correct copy of the Order Transferring and Consolidating Actions for All Purposes dated
22 February 19, 2010.

23 9. Attached as Exhibit G to the Second Motion to Enforce Settlement Agreement is a
24 true and correct copy of Order Awarding Attorneys' Fees dated May 4, 2011.

1
2 I certify and declare under penalty of perjury under the laws of the State of California that
3 the foregoing is true and correct.

4 Executed on July 15, 2015 at San Diego, California.
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7 By: 

8 Lynne M. Brennan
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