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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:
REBECCA LEE WILLIS and DAVID
13 ESTRADA, on behalf of themselves and
all others similarly situated,

14 *Plaintiffs,*

15 v.

16
17 LOS ANGELES COUNTY
18 WATERWORKS DISTRICT NO. 40;
CITY OF LANCASTER; CITY OF
19 PALMDALE; PALMDALE WATER
DISTRICT; LITTLEROCK CREEK
20 IRRIGATION DISTRICT; PALM
RANCH IRRIGATION DISTRICT;
21 QUARTZ HILL WATER DISTRICT;
ANTELOPE VALLEY WATER CO.;
22 ROSAMOND COMMUNITY SERVICE
DISTRICT; PHELAN PINON HILL
23 COMMUNITY SERVICE DISTRICT; and
24 DOES 1 through 1,000;

25 *Defendants.*
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27
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RELATED CASE TO JUDICIAL COUNCIL
COORDINATION PROCEEDING NO. 4408

**DECLARATION OF BRIAN BRENNAN IN
SUPPORT OF WILLIS CLASS' OPPOSITION
TO WOOD CLASS SETTLEMENT**

Date: August 3, 2015

Time: 10:00 A.M.

Place: Los Angeles Superior Court
111 North Hill Street, Room 222
Los Angeles, CA 90012

Judge: Hon. Jack Komar

1 I, Brian Brennan, declare:

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

4 2. I was hired by the law firm of Krause Kalfayan Benink & Slavens, LLP, to assist
5 in a project that required comparing pages of the Wood Class list to the Willis Class list.
6

7 3. In the course of performing my duties at the law firm, I was asked by Mr.
8 Kalfayan and Ms. Brennan to review and compare the Wood Class list of class members emailed
9 by Mr. 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.
12

13 4. I compared pages 17 to 42 of the Wood Class list to the Willis Class list. If I
14 found a Wood Class Member who is also a Member in the Willis Class list, then I marked that
15 name with a "yes." If the Wood Class Member was not on the Willis Class list, then I marked the
16 name with a "no." I also made sure that all persons marked with a "yes" had the same address on
17 both the Willis Class and Wood Class list just to be sure that I have the correct person in both
18 lists. The vast majority of the addresses matched up.

19 5. In comparing pages 17-42 of the Wood Class list, I counted a total of 1,429 Wood
20 Class Members. Out of the 1,429 names, I marked 1,254 with a "yes" and 175 with a "no."
21 Therefore, approximately 87% of the Wood Class Members that I compared are also on the Willis
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1 Class list.

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 20 2015 at San Diego, California.

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7 By: Brian Brennan
8 Brian Brennan