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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

16 v.

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 JADE BOWMAN 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, Jade Bowman, 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 3. In the course of performing my duties at the law firm, I was asked by Mr.
7 Kalfayan and Ms. Brennan to review and compare the Wood Class list of class members emailed
8 by Mr. McLachlan to Mr. Kalfayan on June 19, 2015, to the Willis Class list contained in the
9 avgroundwater.com (Willis Class) website and related database. The printed Wood Class list
10 totaled 79 pages. The Willis Class list and database contains 18,750 names.

11 4. I compared pages 51 to 79 of the Wood Class list to the Willis Class list. If I
12 found a Wood Class Member who is also a Member in the Willis Class list, then I marked that
13 name with a "yes." If the Wood Class Member was not on the Willis Class list, then I marked the
14 name with a "no." I also made sure that all persons marked with a "yes" had the same address on
15 both the Willis Class and Wood Class list just to be sure that I have the correct person in both
16 lists. The vast majority of the addresses matched up.

17 5. In comparing pages 51-79 of the Wood Class list, I counted a total of 1,555 Wood
18 Class Members. Out of the 1,555 names, I marked 1,139 with a "yes" and 416 with a "no."
19 Therefore, approximately 73% 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.

6
7 By: 
8 Jade Bowman