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

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

**WILLIS CLASS' PARTIAL OPPOSITION
TO WOOD CLASS' MOTION TO
CORRECT WILLIS CLASS JUDGMENT
NUNC PRO TUNC**

Date: September 29, 2015

Time: 9:00 AM

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

Judge: Hon. Jack Komar

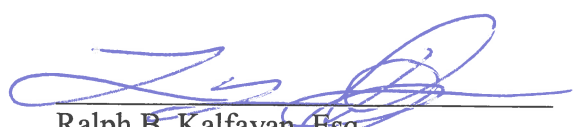
1 The Willis Class only opposes the Wood Class' Motion to Correct the Willis Judgment
2 with respect to one of the proposed changes. A correction of the typographical error in the
3 Amended Final Judgment – specifically, to insert a sentence from the Willis Class definition in
4 the original Final Judgment that was inadvertently deleted -- is entirely appropriate and legally
5 justified. Likewise, adding the Willis Stipulation of Settlement as an Exhibit to the Amended
6 Final Judgment filed on September 22, 2011, is also entirely appropriate and legally justified.

8 However, adding in a line of text to the definition of the Willis Class at the urging of the
9 Wood Class that was never in any version of the Final Judgment or Amended Final Judgment is
10 not appropriate, necessary, procedurally correct, or legally justified. It is four (4) years since the
11 Willis Judgment was entered. Further, the Wood Class has no standing to “correct” the Amended
12 Final Judgment to which only the Willis Class and the Public Water Suppliers are Parties.
13 Moreover, adding in a new line of text to the Willis Class definition at this late date is
14 unnecessary. The Amended Final Judgment should be corrected only to add the sentence that
15 was inadvertently omitted from the Willis Class definition as set forth in the Final Judgment
16 entered on May 12, 2011 and to add the Willis Stipulation of Settlement as an Exhibit.
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19 Dated: September 16, 2015

Respectfully submitted,

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21 KRAUSE, KALFAYAN, BENINK &
22 SLAVENS, LLP

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26 Ralph B. Kalfayan, Esq.
27 Lynne M. Brennan, Esq.
28 Class Counsel for the Willis Class

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ANTELOPE VALLEY WATER CO.;
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23 COMMUNITY SERVICE DISTRICT;
24 and DOES 1 through 1,000;

25 *Defendants.*
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PROOF OF SERVICE

1 I, Lynne M. Brennan, declare:

2 I am a citizen of the United States and employed in San Diego County, California. I am
3 over the age of eighteen years and not a party to the within-entitled action. My business address is
4 Krause Kalfayan Benink & Slavens, LLP 550 West C Street, Suite 530, San Diego, California,
5 92101. On September 16, 2015, I caused the following document(s): to be served on the parties in
6 this action, as follows:

7 **WILLIS CLASS' PARTIAL OPPOSITION TO WOOD CLASS' MOTION TO**
8 **CORRECT WILLIS CLASS JUDGMENT *NUNC PRO TUNC***

9 (X) (BY ELECTRONIC SERVICE) by posting the document(s) listed above to the Santa Clara
10 County Superior Court website: www.scefilings.org regarding the Antelope Valley Groundwater
11 matter.

12 () (BY U.S. Mail) I am readily familiar with the firm's practice of collection and processing
13 of documents for mailing. Under that practice, the above-referenced document(s) were placed in
14 sealed envelope(s) addressed to the parties as noted above, with postage thereon fully prepaid and
15 deposited such envelope(s) with the United States Postal Service on the same date at San Diego,
16 California, addressed to:

17 () (BY FEDERAL EXPRESS) I served a true and correct copy by Federal Express or other
18 overnight delivery service, for the delivery on the next business day. Each copy was enclosed in
19 an envelope or package designed by the express service carrier; deposited in a facility regularly
20 maintained by the express service carrier or delivered to a courier or driver authorized to receive
21 documents on its behalf; with delivery fees paid or provided for; addressed as shown on the
22 accompanying service list.

23 () (BY FACSIMILE TRANSMISSION) I am readily familiar with the firm's practice of
24 facsimile transmission of documents. It is transmitted to the recipient on the same day in the
25 ordinary course of business.

26 (X) (STATE) I declare under penalty of perjury under the laws of the State of California that
27 the above is true and correct.

28 () (FEDERAL) I declare under penalty of perjury under the laws of the United States of
America that the foregoing is true and correct.


Lynne M. Brennan