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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**
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
21 DISTRICT; LITTLEROCK CREEK
22 IRRIGATION DISTRICT; PALM
23 RANCH IRRIGATION DISTRICT;
24 QUARTZ HILL WATER DISTRICT;
ANTELOPE VALLEY WATER CO.;
25 ROSAMOND COMMUNITY SERVICE
26 DISTRICT; PHELAN PINON HILL
27 COMMUNITY SERVICE DISTRICT; and
28 DOES 1 through 1,000;

Defendants.

RELATED CASE TO JUDICIAL COUNCIL
COORDINATION PROCEEDING NO. 4408

**WILLIS CLASS' RESPONSE TO CASE
MANAGEMENT STATEMENT OF UNITED
STATES**

Date: September 21, 2015

Time: 1:00 pm

Place: Telephonic Appearance Only

1 The Willis Class respectfully submits the following Case Management Conference
2 Statement in advance of the September 21, 2015, Status Conference.

3 The United States' proposed order of evidence for the upcoming Phase VI/Physical Solution
4 Trial with respect to the Willis Class' Motions that were Denied Without Prejudice by this Court is
5 not plausible. This Court ruled on the record that the Court would issue a Final Order regarding
6 the Willis Class' Motions only after the Court heard evidence relating to the Stipulating Parties'
7 proposed physical solution or SPPS. Therefore, the Willis Class will be prepared to renew its
8 Motions only after the Court has received and heard evidence regarding the SPPS.
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11 Dated: September 21, 2015

Respectfully submitted,

12 KRAUSE KALFAYAN BENINK & SLAVENS, LLP

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15 By:


Ralph B. Kalfayan, Esq.

Lynne M. Brennan, Esq.

Class Counsel for the Willis Class
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ANTELOPE VALLEY WATER CO.;
23 ROSAMOND COMMUNITY SERVICE
DISTRICT; PHELAN PINON HILL
24 COMMUNITY SERVICE DISTRICT;
and DOES 1 through 1,000;

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

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 21, 2015, I caused the following document(s): to be served on the parties in
6 this action, as follows:

7
8 **WILLIS CLASS' RESPONSE TO CASE MANAGEMENT STATEMENT OF**
9 **UNITED STATES**

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

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

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

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

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

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

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Lynne M. Brennan