

Ralph B. Kalfayan, SBN133464
David B. Zlotnick, SBN 195607
David M. Watson, SBN 219705
KRAUSE, KALFAYAN, BENINK
& SLAVENS LLP
Tel: (619) 232-0331
Fax: (619) 232-4019

Attorneys for Plaintiff and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

REBECCA LEE WILLIS, on behalf of herself)
and all others similarly situated,)
Plaintiff,)

vs.)

LOS ANGELES COUNTY WATERWORKS)
DISTRICT NO. 40; CITY OF LANCASTER;)
CITY OF LOS ANGELES; 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; MOJAVE PUBLIC)
UTILITY DISTRICT; CALIFORNIA)
WATER SERVICE COMPANY; DESERT)
LAKE COMMUNITY SERVICES)
DISTRICT; NORTH EDWARDS WATER)
DISTRICT; and DOES 4 through 1,000,)

Defendant)

JUDICIAL COUNCIL COORDINATION
PROCEEDING No. 4408
Santa Clara Case No. 1-05-CDV-049053
Assigned to The Honorable Jack Komar

**REQUEST BY WILLIS CLASS FOR
CONFERENCE TO ADDRESS
DISCOVERY DISPUTES**

DATE: August 11, 2008
TIME: 9:00 a.m.
DEPT: 1

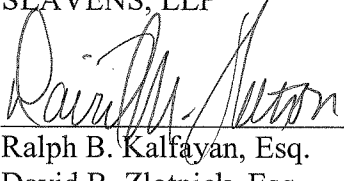
Phase 2 Trial: October 6, 2008

The Willis class was recently served with responses to Special Interrogatories, Set One,
from all the defendant purveyors. Due to the voluminous amounts of discovery in this case and

1 because most defendants responded in a similar boilerplate manner, Willis' counsel believes that
2 a spreadsheet is the most economical manner to present discovery discrepancies to the Court. As
3 such, the interrogatories and corresponding responses were summarized and are attached herein
4 to this request as Exhibit 1. The Willis Class contends that most of the responses are incomplete
5 and merit further responses. While some of the purveyors have agreed to supplement a few of
6 the interrogatories, many remain in dispute. The Willis class requests time from the Court on
7 August 11 to help resolve those disputes before filing a motion to compel. Defendant purveyors
8 have also responded to other discovery requests; Requests for Admission, including Form
9 Interrogatory 17.1 and Requests for Documents. The parties, however, are continuing to meet
10 and confer with respect to these discovery devices.

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12
13 Dated: August 8, 2008

KRAUSE KALFAYAN BENINK &
SLAVENS, LLP


Ralph B. Kalfayan, Esq.
David B. Zlotnick, Esq.

Attorneys for Plaintiff and the Class