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Attorneys for Plaintiff and the Class

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

ANTELOPE VALLEY
GROUNDWATER CASES

This Pleading Relates to Included Action:

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; and DOES 1 through
1,000;

Defendants.

) RELATED CASE TO JUDICIAL
) COUNCIL COORDINATION
) PROCEEDING NO. 4408

) The Honorable Jack Komar
) Coordination Trial Judge

) DECLARATION OF REBECCA LEE
) WILLIS IN OPPOSITION TO MOTION
) FOR STAY

) Date: August 17, 2009
) Time: 9:00 a.m.
) Dept: LASC- Dept. 1

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1 I, REBECCA LEE WILLIS, declare:

2 1. I am a landowner in the Antelope Valley and the representative of the "dormant"
3 landowner Class. I make this declaration in opposition to certain parties' motion to stay this
4 litigation. I have personal knowledge of the facts contained in this declaration and am competent
5 and willing to testify to the facts herein.

6 2. I have attended many, but not all, of the principals' meetings held in this matter in
7 an effort to reach a settlement. The meetings have involved broad discussions of many of the
8 issues that must be addressed as part of any settlement, but there has been no agreement reached
9 on any significant issue.

10 3. In particular, the critical issue of the Basin's yield remains the subject of
11 substantial disagreement. To the best of my knowledge, the parties' very disparate positions on
12 yield and overdraft have not been significantly narrowed, much less the subject of any
13 agreement, during the approximately seven (7) months that these meetings have taken place. Nor
14 to my knowledge have the parties narrowed their divergent views on the issue of whether the
15 purveyors are entitled to prescriptive rights.

16 4. It is important that the Court determine as promptly as possible whether the
17 Public Water Suppliers are correct that the Basin is in a state of overdraft. Without such a
18 finding, it is impossible to take whatever steps might be appropriate to protect the integrity of the
19 Basin for future uses. Hence, I oppose any substantial delay in the trial of this issue.

20 I declare under penalty of perjury under the laws of California that the foregoing is true
21 and correct. Executed on this 31st day of July 2009, in Tehachapi, California.

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25 _____
Rebecca Lee Willis
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