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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**

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

This Pleading Relates to Included Action:  
REBECCA LEE WILLIS, on behalf of herself  
and all others similarly situated,

) PLAINTIFF REBECCA WILLIS' CASE  
) MANAGEMENT CONFERENCE  
) STATEMENT  
)

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;

) Date: August 17, 2009  
) Time: 9:00 a.m.  
) Dept: 1  
) Judge: Hon. Jack Komar  
) Coordination Trial Judge  
)

Defendants.

The Willis Class submits the following status conference statement outlining its positions  
with respect to the pending case management, discovery, settlement, and trial issues.

1           **I. PLEADINGS**

2           The Willis Class' Second Amended Complaint (SAC) is at issue as to the ten (10) Public  
3 Water Suppliers (Suppliers) that Willis sued. That pleading, which challenges the Suppliers'  
4 prescription claims, has been served upon and answered by those parties. Further, Notice has  
5 been completed as to the Willis Class.

6           Conversely, neither the Suppliers nor the other landowners have perfected claims against  
7 the Willis Class. Although the Willis Class is willing to participate in settlement discussions  
8 seeking a comprehensive adjudication of the Basin's groundwater, we have not asserted such  
9 claims and no such claims have been asserted against the Willis Class.

10  
11           **II. DISCOVERY**

12           After considerable effort, the landowners served a uniform set of basic discovery requests  
13 on the Suppliers, and the Suppliers have now responded to those requests. Willis has been  
14 actively reviewing the Suppliers' responses and has been engaged in meet and confer efforts with  
15 the Suppliers. We have retained a copying service to copy, scan, and bate stamp the documents  
16 being produced. Copies of all documents are available to any party willing to share in the costs.

17  
18           **III. TRIAL DATE**

19           Willis has opposed the motion for a stay and believes the Court should set a trial date for  
20 the next phase. We believe that the January 4, 2010 date proposed by District 40 is simply too  
21 aggressive, however. We suggest that fact discovery on relevant issues be concluded by  
22 December 31, 2009, that expert reports be exchanged by January 31, 2010, that expert discovery  
23 be completed by March 15, 2010 and that a trial be set in April 2010. Given the number of  
24 parties and the complexities of this matter, we believe that is a reasonable schedule.

25           Willis has a pending motion for the Court to appoint its own expert to testify as to yield  
26 and overdraft issues. We respectfully request that the Court promptly grant that motion so that  
27 such an expert can prepare for trial.

1       **IV. SETTLEMENT**

2           The Willis Class continues its efforts to settle this litigation. Towards that end, we are  
3 participating in a mediation session before Justice Robie on September 2, 2009. As previously  
4 discussed, in order to make these discussions as manageable and productive as possible, the  
5 initial session(s) will be limited to representatives of the two Classes, the Public Water Suppliers,  
6 and the United States. It is our expectation that other parties will be included in later sessions(s)  
7 when Justice Robie believes that would be productive.

8  
9 Dated: August 12, 2009

KRAUSE KALFAYAN BENINK  
& SLAVENS LLP

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11  
12 /s/Ralph B. Kalfayan  
13 Ralph B. Kalfayan, Esq.  
14 David B. Zlotnick, Esq.  
15 Attorneys for Plaintiff and the Class  
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