

1 Ralph B. Kalfayan, SBN133464
David B. Zlotnick, SBN 195607
2 KRAUSE, KALFAYAN, BENINK
& SLAVENS LLP
3 625 Broadway, Suite 635
San Diego, CA 92101
4 Tel: (619) 232-0331
Fax: (619) 232-4019

5 Attorneys for Plaintiff and the Class
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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF LOS ANGELES**

11 **ANTELOPE VALLEY**
12 **GROUNDWATER CASES**

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

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

) THE WILLIS' CLASS' CASE
) MANAGEMENT CONFERENCE
) STATEMENT
)

15 Plaintiff,
16

17 vs.
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18 LOS ANGELES COUNTY WATERWORKS
DISTRICT NO. 40; CITY OF LANCASTER;
19 CITY OF LOS ANGELES; CITY OF
PALMDALE; PALMDALE WATER
20 DISTRICT; LITTLEROCK CREEK
IRRIGATION DISTRICT; PALM RANCH
21 IRRIGATION DISTRICT; QUARTZ HILL
WATER DISTRICT; ANTELOPE VALLEY
22 WATER CO.; ROSAMOND COMMUNITY
SERVICE DISTRICT; MOJAVE PUBLIC
23 UTILITY DISTRICT; and DOES 1 through
1,000;

) Date: September 7, 2010
) Time: 9:00 a.m.
) Place: Dept. 17 (Santa Clara)
) Judge: Hon. Jack Komar
)

24 Defendants.
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26 The Willis Class respectfully submits the following Case Management
27 Conference Statement.

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1 **I. Status of Willis Class Settlement With Public Entities**

2 The Settlement Agreement between the Willis Class and various public water
3 suppliers has now been executed by all but two of the settling defendants – Phelan
4 Pinon Hills Community Services District and the City of Palmdale. We expect those
5 entities to execute the Willis settlement agreement in the near future, after which
6 we will file a motion for preliminary approval of the proposed settlement. In the
7 alternative, we intend to proceed with the settlement without them and file
8 summary adjudication motions against those two entities with respect to their
9 prescription claims against the Willis Class.

10 **II. Status of the Principals’ Mediation**

11 We have participated in the Principals’ (Waldo) mediation process as well as
12 the recent mediation before Justice Robie in the hope that we can help achieve a
13 broader, more comprehensive, resolution of this litigation. We support a
14 comprehensive settlement and will continue to participate in those mediations to
15 the extent that our participation can be productive. We emphasize that we do not
16 regard our settlement with the Public Water Suppliers as precluding such a broader
17 resolution. Rather, we hope that it will be a step towards a comprehensive
18 settlement involving most, if not all, of the parties to the litigation.

19 Dated: August 30, 2010

KRAUSE KALFAYAN BENINK
& SLAVENS LLP

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/s/Ralph B. Kalfayan
Ralph B. Kalfayan, Esq.
David B. Zlotnick, Esq.
Attorneys for Plaintiff and the Class