

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

Attorneys for Plaintiff
Rebecca Lee Willis and the Willis 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,

vs.

LOS ANGELES COUNTY WATERWORKS
DISTRICT NO. 40; CITY OF LANCASTER;
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; PHELAN PINON HILL
COMMUNITY SERVICE DISTRICT; and
DOES 1 through 1,000;

) **DECLARATION OF DAVID B.
ZLOTNICK IN SUPPORT OF
PLAINTIFF WILLIS' OPPOSITION
TO PUBLIC WATER SUPPLIERS' EX
PARTE APPLICATION FOR
EXTENSION OF HEARING DATE
FOR PLAINTIFF'S MOTION FOR AN
AWARD OF ATTORNEYS' FEES,
REIMBURSEMENT OF EXPENSES,
AND PAYMENT OF INCENTIVE
AWARD TO REPRESENTATIVE
PLAINTIFF**
)

Date: February 3, 2011
Time: 1:30 p.m.
Dept: 4
Judge: Hon. Jack Komar
)

Defendants.
)

I, David B. Zlotnick, declare and state as follows:

1. I am Of Counsel to the law firm of Krause Kalfayan Benink & Slavens LLP ("KKBS"),
counsel for the Willis Class in the above captioned matter. I submit this declaration in support of

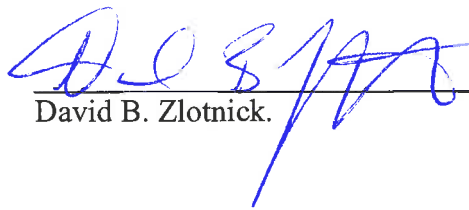
1 PLAINTIFF WILLIS' OPPOSITION TO PUBLIC WATER SUPPLIERS' EX PARTE
2 APPLICATION FOR EXTENSION OF HEARING DATE FOR PLAINTIFF'S MOTION FOR
3 AN AWARD OF ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES, AND
4 PAYMENT OF INCENTIVE AWARD TO REPRESENTATIVE PLAINTIFF. The matters
5 stated herein are true to the best of my personal knowledge and, if called upon to testify thereto, I
6 could and would competently do so.

7
8 2. I am an attorney admitted to practice before the courts of the State of California,
9 as well as the Federal District Courts for the Central and Southern Districts of California, and the
10 Ninth Circuit Court of Appeals.

11 3. In conversations with Settling Defendants' counsel with regard to their request for
12 an extension of time to respond to Plaintiff's fee application, they only identified having time to
13 take the depositions of Mr. Kalfayan and myself as the additional discovery they needed to
14 accomplish before responding to the petition.

15 4. Attached hereto are the limited discovery requests that Plaintiff served on
16 Defendants on January 11, 2011, seeking information relevant to our fee petition.

17 I declare under penalty of perjury under the laws of the State of California that the
18 foregoing is true and correct. Executed this 3rd day of February, 2011, in San Diego, California.
19

20
21
22 
23 David B. Zlotnick.
24
25
26
27
28