EXHIBIT A

1 2 3 4 5 6 7 8	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 and the Class		
9	SUPERIOR COURT OF THE	STATE OF CALIFORNIA	
10	FOR THE COUNTY OF LOS ANGELES		
11			
12	ANTELOPE VALLEY GROUNDWATER CASES	RELATED CASE TO JUDICIAL COUNCIL COORDINATION PROCEEDING NO. 4408	
13	This Disading Deletes to Included Actions)	
14	This Pleading Relates to Included Action: REBECCA LEE WILLIS, on behalf of herself and all others similarly situated,	PLAINTIFF REBECCA WILLIS' SPECIAL INTERROGATORIES	
15 16	Plaintiff,) PROPOUNDED ON EACH PUBLIC) WATER SUPPLIER LISTED ON) EXHIBIT 1 (THIRD SET)	
17	vs.))	
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;))	
24	Defendants.))	
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1	PROPOUNDING PARTY:	REBECCA WILLIS
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3	RESPONDING PARTY:	EACH CROSS-COMPLAINING PUBLIC WATER SUPPLIER LISTED ON EXHIBIT 1
4	SET:	THREE
5		
6	PRELIMINARY STATEMENT	
7	Pursuant to Code of Civil Procedure section 2030.010, et. seq., Rebecca Willis	
8	hereby requests that responding party answers under oath the following Special	
9	Interrogatories [Set Three] within thirty (30) days of service.	
10		
11		<u>DEFINITIONS</u>
12	(a) YOU and YOUR:	includes you, the responding party, your agents, your
13	employees, your consultants,	their agents, their employees, your attorneys, your
14	accountants, your investigators, and anyone else acting on your behalf.	
15		
16	(b) RELEVANT PE	RIOD includes November 1, 2006 through the
17	present.	
18	(c) THE LITIGATIO	N refers to the Antelope Valley Groundwater Cases.
19	CDEC	IAI INMEDDOCAMODINO
20		IAL INTERROGATORIES
21	SPECIAL INTERROGATOR	Y NO. 1:
22	State the total amount y	you have been billed by any counsel for its services in
23	this matter during the RELEV	VANT PERIOD, broken down on a monthly or other
24	applicable periodic basis.	
25	SPECIAL INTERROGATOR	<u>Y NO. 2:</u>
26	State the number of hou	urs billed by YOUR counsel on this matter during the
27		and a series of the control of the matter adding the

RELEVANT PERIOD, broken down on a monthly or other applicable periodic basis.

1 SPECIAL INTERROGATORY NO. 3: 2 State the number of hours that your in-house counsel has worked on this 3 matter during the RELEVANT PERIOD, broken down on a monthly or other 4 applicable periodic basis. 5 SPECIAL INTERROGATORY NO. 4: 6 7 State the total amount you have paid for legal services rendered in this 8 matter during the RELEVANT PERIOD, broken down on a monthly or other 9 applicable periodic basis. 10 **SPECIAL INTERROGATORY NO. 5:** 11 State the billing rate(s) you have paid counsel for their work on this matter 12 13 during the RELEVANT PERIOD, identifying the extent to which, if at all that rate 14 is a discounted rate. 15 KRAUSE KALFAYAN BENINK Dated: January 11, 2011 16 & SLAVENS LLP 17 18 19 Ralph B. Kalfayan, 20 David B. Zlotnick, Esq. Attorneys for Plaintiff and the Class 21 22 23 24 25 26 27

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EXHIBIT 1

1		EXHIBIT 1	
2			
3	Public Water Suppliers:		
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5	1.	Los Angeles County Waterworks District No. 40;	
6	2.	Palmdale Water District;	
7	3.	Littlerock Creek Irrigation District;	
8	4.	Palm Ranch Irrigation District;	
9	5.	Quartz Hill Water District;	
10	6.	Rosamond Community Service District;	
11	7.	California Water Service Company;	
12	8.	North Edwards Water District;	
13	9.	Desert Lakes Community Services District;	
14	10.	Phelan Pinon Hills Community Services District;	
15	11.	City of Palmdale; and	
16	12.	City of Lancaster.	
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