

EXHIBIT A

Attorneys for Plaintiff and the Class

1 **PROPOUNDING PARTY:** REBECCA WILLIS

2
3 **RESPONDING PARTY:** EACH CROSS-COMPLAINING PUBLIC WATER
4 SUPPLIER LISTED ON EXHIBIT 1

5
6 **SET:** THREE

7
8 **PRELIMINARY STATEMENT**

9 Pursuant to Code of Civil Procedure section 2030.010, et. seq., Rebecca Willis
10 hereby requests that responding party answers under oath the following Special
11 Interrogatories [Set Three] within thirty (30) days of service.

12 **DEFINITIONS**

13 (a) **YOU and YOUR** includes you, the responding party, your agents, your
14 employees, your consultants, their agents, their employees, your attorneys, your
15 accountants, your investigators, and anyone else acting on your behalf.

16 (b) **RELEVANT PERIOD** includes November 1, 2006 through the
17 present.

18 (c) **THE LITIGATION** refers to the Antelope Valley Groundwater Cases.

19
20 **SPECIAL INTERROGATORIES**

21 **SPECIAL INTERROGATORY NO. 1:**

22 State the total amount you have been billed by any counsel for its services in
23 this matter during the RELEVANT PERIOD, broken down on a monthly or other
24 applicable periodic basis.

25 **SPECIAL INTERROGATORY NO. 2:**

26 State the number of hours billed by YOUR counsel on this matter during the
27 RELEVANT PERIOD, broken down on a monthly or other applicable periodic basis.
28

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.
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6 **SPECIAL INTERROGATORY NO. 4:**

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.
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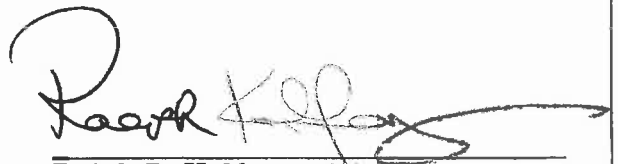
11 **SPECIAL INTERROGATORY NO. 5:**

12 State the billing rate(s) you have paid counsel for their work on this matter
13 during the RELEVANT PERIOD, identifying the extent to which, if at all that rate
14 is a discounted rate.
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16 Dated: January 11, 2011

KRAUSE KALFAYAN BENINK
& SLAVENS LLP

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

EXHIBIT 1

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EXHIBIT 1

Public Water Suppliers:

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