# **EXHIBIT B**

#### **David Zlotnick**

From: Sent: tomdoria [actionemail@yahoo.com] Friday, January 28, 2011 5:02 AM

To:

David Zlotnick

Cc:

**DONNA** 

Subject:

Re: ANTELOPE VALLEY LAND GRAB

#### Mr. Zlotnick:

I have considered the advice you have provided (email correspondence below for reference) and I would like to know if I can petition to opt out of the Willis class action by petitioning the court prior to the February 24, 2011 hearing or if I can do so at the hearing on that date. Since you indicated that you did not personally handle either mailing to the class, can you please provide me with the contact information of the person or entity that did handle the mailing so that I can attempt to secure the proof I am seeking?

I acknowledge your assertion that I may be allowed to opt out of the class, but that I cannot escape being involved in litigation.

Thank you for forwarding my last email to Ms. Willis. Although, at this time, we appear to have similar interests and are presumed to be in the same class action, I have received no communication from Ms. Willis. Would you kindly do me the favor of forwarding this email to Ms. Willis as a reminder that I am interested in communicating with her?

Regards,

Vernon T. Doria (909) 496-7444

**From:** David Zlotnick < <u>David@kkbs-law.com</u>> **To:** tomdoria <actionemail@yahoo.com>

Cc: Stefanie Hedlund <Stefanie.Hedlund@bbklaw.com>; Ralph Kalfayan <Ralph@kkbs-law.com>

**Sent:** Tue, January 18, 2011 12:03:46 PM **Subject:** RE: ANTELOPE VALLEY LAND GRAB

Dear Mr. Doria:

I did not personally handle either mailing to the Class and cannot provide proof that you were sent the earlier mailing. You may certainly request that the Court allow you to "opt out" at this time and I will not object to that request. Please be advised, however, that the Public Water Suppliers have personally sued the persons who submitted opt outs, requiring those persons to participate in the litigation directly. In other words, you may be allowed to opt out of the Class, but cannot escape being involved in the litigation.

Finally, I forwarded your e-mail to Ms Willis.

Yours,

David B. Zlotnick

From: tomdoria [mailto:actionemail@yahoo.com]
Sent: Tuesday, January 18, 2011 7:05 AM

## **David Zlotnick**

From: Sent: tomdoria [actionemail@yahoo.com] Tuesday, January 18, 2011 7:05 AM

To:

David Zlotnick

Subject:

ANTELOPE VALLEY LAND GRAB

Mr. Zlotnick:

Since receiving recent notification of the class action lawsuit of Rebecca Lee Willis vs Los Angeles Co. Waterworks Dist 40, which I might add was received in a bulk mail envelope without a postmark, I have discussed this matter with my sister who is also half owner of the Antelope Valley property in question. Both of us agree that we were never previously notified of this matter and therefore were not given the opportunity to opt out of the said class action.

Can you please show me proof that we were contacted on a previous occasion regarding this matter? Additionally, my sister and I are not interested in allowing any water company the rights to the water that was purchased with the property. We are not interested in allowing this via prescriptive easement, adverse possession or any other legal term that the water district might rest on or manufacture.

It stands to reason that if we are stating our position with such vehemence now, that we would certainly have stated it similarly, if we had received any prior notice of what appears to be a stealthy attempt to steal our water and/or make us pay for the water that was already paid for along with the land purchase years ago. Again, we never received prior notice of the water departments lying in the wheat attempt to grab our water and therefore did not have an opportunity to opt out of this folly on any prior occasion. We would therefore like to take the time now to put you on notice of our intent to consult with an attorney that may not be so willing to give away our water rights.

Could you please put me in touch with Rebecca Lee Willis? You are free to provide her with my email address and phone number. I expect that since she considers me a part of her same class action that she will have no problem contacting me.

Highest regards,

Vernon T. Doria Son of: Rose Marie Doria (original owner) (909) 496-7444

## **David Zlotnick**

From: Sent:

tomdoria [actionemail@yahoo.com] Saturday, January 15, 2011 8:37 PM

To:

David Zlotnick

Subject:

ANTELOPE VALLEY LAND GRAB

## Mr. Zlotnick:

I recently received a copy of the class action notice from my sister, pertaining to the "land grab" by the water districts. It sounds to me like we land owners already have the right to pump all the water we want onto our properties but the lawsuit will provided us with a limited ability to do that in the future, causing us to pay for any overage that we pump. Why would we want to give up the freedom to our water rights so the water districts can charge us for our own water? I fail to see how that is a win for us and why you would be recommending settlement to that effect. Can you please explain that to me?

Regards,

Vernon T. Doria 2010 E. Foothill Drive San Bernardino, CA 92404-3022 (909) 496-7444 actionemail@yahoo.com