

EXHIBIT A

Ralph Kalfayan

From: Jeffrey Dunn [jeffrey.dunn@BBKLAW.COM]
Sent: Friday, June 11, 2010 4:01 PM
To: Ralph Kalfayan
Subject: Re: Transferee motion

I don't know if you are going to get this over the weekend but you have pretty much killed any deal.

From: Ralph Kalfayan <Ralph@kkbs-law.com>
To: Tom Bunn <TomBunn@lagerlof.com>; David Zlotnick <David@kkbs-law.com>
Cc: Brad Weeks <Brad@CharltonWeeks.com>; Eric Garner; James Markman <JMarkman@rwglaw.com>; Jeffrey Dunn; Jess Senecal <JSenecal@lagerlof.com>; Jim Ciampa <JCiampa@lagerlof.com>; John Tootle <jtootle@calwater.com>; Keith Lemieux <keith@lemieux-oneill.com>; Stefanie Hedlund; Steve Orr <sorr@rwglaw.com>; Tim Gosney <TGosney@lagerlof.com>; Warren Wellen <Wwellen@counsel.lacounty.gov>; Wayne Lemieux <wayne@lemieux-oneill.com>
Sent: Fri Jun 11 14:28:58 2010
Subject: RE: Transferee motion

Hi Tom,

The suggestion was made to Jeff Dunn in prior conversations. As you know, Jeff has the lead in communicating on behalf of all the PWS.

In my communication with title companies, I was told that with a court order attaching parcels as an exhibit title companies would oblige and disclose as an exception on title. You could also make them nominal defendants. I have a list of all title companies in the valley.

Btw, I saw you signed on with LACs reply brief.

Ralph

Ralph B. Kalfayan

Krause Kalfayan

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From: Tom Bunn [mailto:TomBunn@lagerlof.com]
Sent: Friday, June 11, 2010 1:57 PM
To: Ralph Kalfayan
Cc: Brad Weeks; Eric Garner; James Markman; Jeffrey Dunn; Jess Senecal; Jim Ciampa; John Tootle; Keith Lemieux; Stefanie Hedlund; Steve Orr; Tim Gosney; Warren Wellen; Wayne Lemieux
Subject: Transferee motion

Ralph,

I read your most recent opposition. I do not recall your having suggested a notice to title companies, and of course there is no supporting declaration attached to your opposition. Would you please let me know when you suggested it to Palmdale Water District.

Why would giving notice to title companies ensure that the litigation shows up in title reports? It seems to me the title companies would ignore the notice, because notice to a title company does not operate as notice to a party. There is ample authority for that, which I can supply if needed.

Tom

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