

Attorneys for Plaintiff and the Class

ANTELOPE VALLEY GROUNDWATER CASES

This Pleading Relates to Included Action:
REBECCA LEE WILLIS, on behalf of herself
and all others similarly situated,

VS.

LOS ANGELES COUNTY WATERWORKS DISTRICT NO. 40; CITY OF LANCASTER; CITY OF LOS ANGELES; 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; MOJAVE PUBLIC UTILITY DISTRICT; and DOES 1 through 1,000;

DATE: May 2, 2012
TIME: 10:00 a.m.
PLACE: Telephonic

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1 The Willis class respectfully submits the following status conference statement with
2 respect to the pending mediation before Justice Robie.

3 At the April 17, 2012 Case Management Conference, the Court inquired as to whether
4 any parties are *not participating* in the ongoing mediation before Justice Robie. Although Messrs
5 Dunn and Zimmer addressed that issue, Willis Class Counsel wish to clarify that we have not
6 been participating in the mediation. As the Court is aware, the Willis Class settled its claims
7 with the Public Water Suppliers last year. The Class has no claims pending against any party to
8 this matter; nor have any other parties to this coordinated litigation asserted any claims against
9 the Class. Given the fact that the Class has settled all of its claims and counsel are confident that
10 the Suppliers will not enter into a physical solution or other settlement that is inconsistent with
11 the Class settlement, we see no need to participate in the mediation. In that regard, the Class
12 Settlement Stipulation narrowly limits Class Counsel's right to seek compensation from the
13 Suppliers for post-judgment efforts. In accord with the Stipulation, we inquired of Suppliers'
14 counsel whether it was necessary for Willis Counsel to attend the mediation and were advised
15 that our participation was not required. Accordingly, absent a specific request from Suppliers'
16 counsel or direction from the Court, Willis does not intend to participate in the mediation.

17 Dated: April 25, 2012

KRAUSE KALFAYAN BENINK
& SLAVENS LLP

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20 /s/Ralph B. Kalfayan, Esq.
21 Ralph B. Kalfayan, Esq.
22 David B. Zlotnick, Esq.
23 Attorneys for Plaintiff and the Class
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