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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF LOS ANGELES

10 ANTELOPE VALLEY
11 GROUNDWATER CASES

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

14 *Plaintiff,*

15 v.

16 LOS ANGELES COUNTY
17 WATERWORKS DISTRICT NO. 40;
18 CITY OF LANCASTER; CITY OF
PALMDALE; PALMDALE WATER
19 DISTRICT; LITTLEROCK CREEK
IRRIGATION DISTRICT; PALM
20 RANCH IRRIGATION DISTRICT;
QUARTZ HILL WATER DISTRICT;
21 ANTELOPE VALLEY WATER CO.;
22 ROSAMOND COMMUNITY SERVICE
DISTRICT; PHELAN PINON HILL
23 COMMUNITY SERVICE DISTRICT; and
DOES 1 through 1,000;

24 *Defendants.*
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RELATED CASE TO JUDICIAL COUNCIL
COORDINATION PROCEEDING NO. 4408


**WILLIS CLASS' CASE MANAGEMENT
STATEMENT**

Date: October 10, 2014
Time: 9:00 am
Place: Courtroom 222
Judge: Hon. Judge Komar

1 The Willis class respectfully submits the following case management statement in
2 advance of the October 10, 2014 hearing.

3 As we have previously advised the Court in prior Status Conference Statements, the Willis
4 class is NOT a settling party to the present draft Proposed Physical Solution (the "PPS"). See
5 prior Willis Status Conference Statements of May 23, 2014, August 11, 2014, and September 26,
6 2014 submitted to the court with reference to the status of the settlement and the position of the
7 Willis class. Unfortunately, there is little, if anything, new to report in this status conference
8 statement other than to alert the court that Willis class counsel was not invited to any of the recent
9 negotiations that were ostensibly held every day over the past ten (10) days among certain other
10 parties. Class counsel will submit the Willis Class' views on the merits of the PPS when that
11 document is finalized, signed, and submitted to the Court. At this time, we note simply that
12 neither the public water suppliers nor the pumping landowners have shown any interest in
13 negotiating in good faith a physical solution with the Willis class. Given that the draft PPS
14 apparently seeks to bind the Willis class *against its will* and seeks to *subordinate if not outright*
15 *extinguish* its entire interest in the Basin's native safe yield, Willis class counsel will be
16 compelled to oppose the Court's approval of the PPS.
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21 Respectfully submitted,

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23 Ralph B. Kalfayan, Esq.
24 KRAUSE, KALFAYAN, BENINK &
25 SLAVENS, LLP
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1 **PROOF OF SERVICE**

2 I, Ian Krupar, declare:

3 I am a citizen of the United States and employed in San Diego County, California. I am
4 over the age of eighteen years and not a party to the within-entitled action. My business address
5 is Krause Kalfayan Benink & Slavens, LLP 550 West C Street, Suite 530, San Diego, California
92101. On October 9, 2014, I caused the foregoing documents(s):

6 **WILLIS CLASS' CASE MANAGEMENT STATEMENT**

7 to be served on the parties in this action, as follows:

8 (X) (BY ELECTRONIC SERVICE) by posting the document(s) listed above to the Santa
9 Clara County Superior Court website: www.scefiling.org regarding the Antelope Valley
10 Groundwater matter.

11 () (BY U.S. Mail) I am readily familiar with the firm's practice of collection and processing
12 of documents for mailing. Under that practice, the above-referenced documents(s) were placed in
13 sealed envelope(s) addressed to the parties as noted above, with postage thereon fully prepaid and
deposited such envelope(s) with the United States Postal Service on the same date at San Diego,
California, addressed to:

14 () (BY FEDERAL EXPRESS) I served a true and correct copy by Federal Express or other
15 overnight delivery service, for the delivery on the next business day. Each copy was enclosed in
16 an envelope or package designed by the express service carrier; deposited in a facility regularly
17 maintained by the express service carrier or delivered to a courier or driver authorized to receive
documents on its behalf; with delivery fees paid or provided for; addressed as shown on the
accompanying service list.

18 () (BY FACSIMILE TRANSMISSION) I am readily familiar with the firm's practice of
19 facsimile transmission of documents. It is transmitted to the recipient on the same day in the
20 ordinary course of business.

21 (X) (STATE) I declare under penalty of perjury under the laws of the State of California that
the above is true and correct.

22 () (FEDERAL) I declare under penalty of perjury under the laws of the United States of
23 America that the foregoing is true and correct.

24 
25 Ian D. Krupar