

1 Ralph B. Kalfayan (SBN 133464)  
2 KRAUSE KALFAYAN BENINK &  
3 SLAVENS, LLP  
4 550 West C Street, Suite 530  
5 San Diego, CA 92101  
6 Tel: (619) 232-0331  
7 Fax: (619) 232-4019

8 Attorney for the Willis Class

9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
SUPERIOR COURT OF THE STATE OF CALIFORNIA  
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  
14 herself and all others similarly situated,

15 *Plaintiff,*

16 v.

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

*Defendants.*

RELATED CASE TO JUDICIAL COUNCIL  
COORDINATION PROCEEDING NO. 4408

**DECLARATION OF RALPH B. KALFAYAN  
IN SUPPORT OF WILLIS CLASS' REPLY  
BRIEF TO LOS ANGELES COUNTY  
WATERWORKS DISTRICT NO. 40'S  
LIMITED OPPOSITION TO WILLIS CLASS'  
MOTION FOR LEAVE TO ADD OR  
SUBSTITUTE CLASS REPRESENTATIVES**

Date: November 4, 2014  
Time: 10:00 AM  
Place: Department 3 Room 224  
Judge: Hon. Judge Komar

1 I, Ralph B. Kalfayan, declare and state as follows:

2 1. I am a partner at the law firm of Krause Kalfayan Benink & Slavens, LLP (hereinafter  
3 "KKBS"), and Counsel for the Willis Class. I submit this declaration in support of Willis Class'  
4 Reply Brief to Los Angeles County Waterworks District No. 40's Limited Opposition to Willis  
5 Class' Motion for Leave to Add or Substitute Class Representatives. The matters stated herein  
6 are true to the best of my own personal knowledge, and if called upon as a witness to testify  
7 thereto, I would and could competently do so.

9 2. Attached to my declaration, as Exhibit A, is a true and correct copy of a screen shot  
10 from the database containing the list of Willis Class members maintained by the law firm of Best  
11 Best & Krieger ("BBK"). BBK administered the Willis Class notice program as part of the Class  
12 certification process and identified Willis Class members eligible to receive notice under the  
13 program. Based on this screenshot, the Archdiocese appears to be one of the many landowners  
14 identified by District 40 as eligible to receive notice of the Willis Class action and it considered  
15 the Archdiocese as part of the Willis Class.

17 3. Our records reflect that the Archdiocese did not exclude itself from the Class.

18 I declare under penalty of perjury under the laws of the State of California that the  
19 foregoing is true and correct.

21 Executed on this 28<sup>th</sup> day of October, 2014 at San Diego, California.

23  
24   
25 Ralph B. Kalfayan, Esq.  
26  
27  
28

# Exhibit A

# Antelope Valley Groundwater Class Action Website

[Main Menu](#) | [Undeliverable Mail](#) | [Search](#) | [Online Form - Portal Login](#)  
[Online Form - Alternate Login](#) | [Change of Address Information](#)

## TEXT SEARCH

### SEARCH RESULTS: 3 Found

ARCHDIOCESE OF LA EDUCATION, 3424 WILSHIRE BLVD LOS ANGELES, CA 90010-2202	Parcel Legal Description/Address:
Mailing ID: AV04390	
ARCHDIOCESE OF LA EDUCATION, 3424 WILSHIRE BLVD LOS ANGELES, CA 90010-2202	Parcel Legal Description/Address:
Mailing ID: AV04391	
ARCHDIOCESE OF LOS ANGELES, 3424 WILSHIRE BLVD LOS ANGELES, CA 90010-2202	Parcel Legal Description/Address:
Mailing ID: AV48680	