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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' PARTIAL
OPPOSITION TO PROPOSED CASE
MANAGEMENT ORDER**

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 Partial Opposition to Proposed Case Management Order. The matters stated herein are true to the
5 best of my own personal knowledge, and if called upon as a witness to testify thereto, I would and
6 could competently do so.
7

8 2. Attached to my declaration, as Exhibit A, is a true and correct copy of a document
9 given to me by Best Best & Krieger ("BBK"), counsel for Los Angeles Waterworks District #40.
10 BBK administered the Willis Class notice program as part of the Class certification process and
11 determined the composition of the Willis Class. This document describes the composition of the
12 Willis Class.
13

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

16 Executed on this 30th day of October, 2014 at San Diego, California.
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19 /s/Ralph B. Kalfayan
Ralph B. Kalfayan, Esq.
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Exhibit A

We have a few questions that I hope you or your expert can answer for us.

What is the total acreage of the adjudication area?

890,137

How many acres do the Willis Class members own collectively?

531,904

How many acres do the Wood Class members own collectively?

How many acres does the United States own?

265,986

State of California? Other public entities?

10,221

Re Willis Class members:

How many persons own less than 5 acres? (Or how many parcels are less than 5 acres?)

49,070

Same question re 5-20 acres?

14,157

Same question re 20-100 acres?

3,683

Same question re parcels over 100 acres?

638

67,548 PARCELS

Notes:

1) This analysis did not include the Willis Class members inside public water supplier service areas.

2) The amount of land owned by each entity is and approximation, based upon the area of full and partial parcels