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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF LOS ANGELES
10

11 ANTELOPE VALLEY
12 GROUNDWATER CASES

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

15 *Plaintiff,*

16 v.
17

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

25 *Defendants.*
26
27
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RELATED CASE TO JUDICIAL COUNCIL
COORDINATION PROCEEDING NO. 4408

The Honorable Jack Komar
Coordination Trial Judge

**DECLARATION OF RALPH B. KALFAYAN
IN SUPPORT OF WILLIS CLASS' MOTION
FOR COURT-APPOINTED EXPERT OR, IN
THE ALTERNATIVE, MOTION TO
DECERTIFY THE WILLIS CLASS**

Date: March 26, 2015

Time: 10:00 a.m.

Place: Superior Court of California,
County of Los Angeles
111 North Hill Street, Room 222
Los Angeles, Ca 90012

1 I, Ralph B. Kalfayan, declare:

2
3 1. I have personal knowledge of the facts below, and if called upon to do so, I could
4 and would testify competently thereto in a court of law.

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6 2. I am an attorney licensed to practice law in the State of California. I am a named
7 partner at the law firm of Krause, Kalfayan, Benink & Slavens, LLP, Class Counsel and attorney
8 of record for the Willis Class.

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10 3. Attached as Exhibit A to the Willis Class' Motion for Court-Appointed Expert or,
11 in the Alternative, Motion to Decertify the Willis Class ("Willis Class' Motion") are true and
12 correct copies of excerpts from the Reporter's Transcript transcribed from the hearing heard on
13 April 24, 2009, of which I have highlighted relevant portions.

14
15 4. Attached as Exhibit B to the Willis Class' Motion are true and correct copies of
16 excerpts from the Reporter's Transcript transcribed from the hearing heard on April 17, 2012, of
17 which I have highlighted relevant portions.

18
19 5. Attached as Exhibit C to the Willis Class' Motion is a true and correct copy of
20 Richard Wood's Notice of Motion and Motion for Order Authorizing Court-Appointed Expert
21 Witness Work, of which I have highlighted relevant portions.

22
23 6. Attached as Exhibit D to the Willis Class' Motion are true and correct copies of
24 excerpts from the Reporter's Transcript transcribed from the hearing heard on June 16, 2011, of
25 which I have highlighted relevant portions.

26
27 7. Attached as Exhibit E to the Willis Class' Motion is a true and correct copy of
28 Federal Defendants' Response to Richard Wood's Motion to Decertify Small Pumper Class, of
which I have highlighted relevant portions.

8. Attached as Exhibit F to the Willis Class' Motion is a true and correct copy of the
Letter from Mr. McLachlan (Wood Class Counsel) to the Court dated May 14, 2008, of which I
have highlighted relevant portions.

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1 9. Attached to Exhibit G to the Willis Class' Motion is a true and correct copy of
2 Richard Wood's Response to AGWA's Motion to Decertify Class, of which I have highlighted
3 relevant portions.

4 10. Attached as Exhibit H to the Willis Class' Motion is a true and correct copy of
5 Richard Wood's Reply Brief in Support of Motion for Appointment of Expert, of which I have
6 highlighted relevant portions.

7 11. Attached as Exhibit I to the Willis Class' Motion is a true and correct copy of a
8 Letter Re: Proposed Scope of Work of Potential Expert Witness David Sunding, Ph.D. and Dr.
9 Sunding's Curriculum Vitae.

10 12. Attached as Exhibit J to the Willis Class' Motion is a true and correct copy of the
11 Order After Case Management Conference on May 6, 2010, of which I have highlighted relevant
12 portions.

13 13. Attached as Exhibit K to the Willis Class' Motion is a true and correct copy of
14 Richard Wood's Reply in Support of Motion for Order Authorizing Court-Appointed Expert Work,
15 of which I have highlighted relevant portions.

16 14. Attached as Exhibit L to the Willis Class' Motion is a true and correct copy of the
17 Order Denying Motion of Wood Class Settling Defendants to be Relieved of All Court-Orders for
18 Payment of Court-Appointed Expert Fees and Costs, of which I have highlighted relevant portions.\

19 15. Attached as Exhibit M to the Willis Class' Motion is a true and correct copy of Los
20 Angeles County Waterworks District 40's Opposition to Motion of Wood Class Settling
21 Defendants to be Relieved of All Court-Orders for Payment of Court-Appointed Expert Fees and
22 Costs, of which I have highlighted relevant portions.

23 I certify and declare under penalty of perjury under the laws of the United States that the
24 foregoing is true and correct.

25 Executed on March 4, 2015 at San Diego, California.

26
27 By: 

28 Ralph B. Kalfayan