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Class Counsel for the Willis Class

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

**ANTELOPE VALLEY GROUNDWATER
CASES**

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

Plaintiffs,

v.

LOS ANGELES COUNTY WATERWORKS
DISTRICT NO. 40; CITY OF LANCASTER;
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; PHELAN PINON
HILL COMMUNITY SERVICE DISTRICT;
and DOES 1 through 1,000;

Defendants.

RELATED CASE TO JUDICIAL COUNCIL
COORDINATION PROCEEDING NO. 4408

**WILLIS CLASS' OPPOSITION TO WOOD
CLASS' REQUEST TO TERMINATE
CLASS COUNSEL'S DUTIES**

Date: April 1, 2016

Time: 1:30 p.m.

Dept.: 1

Court: San Jose Superior Court
191 N. First Street
San Jose, CA 95113

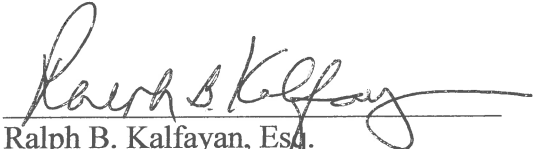
Judge: Hon. Jack Komar

1 The Willis Class opposes the Wood Class' request to terminate duties as class counsel as
2 premature. The Wood Class is asking for an opinion that its counsel can be relieved of his duties
3 sometime in the future. The future direction of this case is currently unknown and events and
4 decisions can take this adjudication down several different paths. Wood Class Counsel has
5 presented no justification that would enable the Court to assume the risk of an improper ruling
6 based on insufficient knowledge of future facts. For these reasons the Willis Class requests that
7 the Wood Class motion be presently denied.
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10 Dated: March 18, 2016

Respectfully submitted,

11 KRAUSE, KALFAYAN, BENINK &
12 SLAVENS, LLP

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15 Ralph B. Kalfayan, Esq.
16 Class Counsel for the Willis Class
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Ralph B. Kalfayan (SBN 133464)
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GROUNDWATER CASES**

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Plaintiffs,

v.

LOS ANGELES COUNTY
WATERWORKS DISTRICT NO. 40;
CITY OF LANCASTER; 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; PHELAN PINON HILL
COMMUNITY SERVICE DISTRICT;
and DOES 1 through 1,000;

Defendants.

RELATED CASE TO JUDICIAL COUNCIL
COORDINATION PROCEEDING NO. 4408

PROOF OF SERVICE

1 I, Cindy Barba, declare:

2 I am a citizen of the United States and employed in San Diego County, California. I am
3 over the age of eighteen years and not a party to the within-entitled action. My business address is
4 Krause Kalfayan Benink & Slavens, LLP 550 West C Street, Suite 530, San Diego, California,
5 92101. On March 18, 2016, I caused the following document(s) to be served on the parties in this
6 action, as follows:

7 **WILLIS CLASS' OPPOSITION TO WOOD CLASS' REQUEST TO**
8 **TERMINATE CLASS COUNSEL'S DUTIES**

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

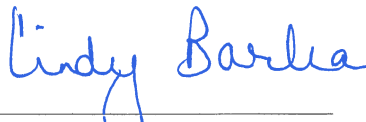
12 () (BY U.S. Mail) I am readily familiar with the firm's practice of collection and processing
13 of documents for mailing. Under that practice, the above-referenced documents(s) were placed in
14 sealed envelope(s) addressed to the parties as noted above, with postage thereon fully prepaid and
15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

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

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

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

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


Cindy Barba