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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' OBJECTIONS TO ROBAR
PARTIES' PROVE UP PROCEEDING**

Date: May 25, 2016
Time: 9:00 am
Place: Room 222
Judge: Hon. Jack Komar

1 The Willis Class respectfully objects to the proceedings related to the Robar prove-up trial
2 currently scheduled for May 25, 2016. The Willis Class filed a notice of appeal on February 19,
3 2016 from the December 28, 2015 Final Judgment and Physical Solution. The Final Judgment
4 specifically includes an allocation of water to the Robar parties. See, p. 2 of the Judgment. That
5 allocation is either supported by the record or it is not. A “prove-up” now—after the judgment has
6 been rendered and appeals have been filed—is beyond the Court’s jurisdiction.
7

8 In addition, the Court, in ruling on the Willis Class’ objections to the judgment, specifically
9 declined to retain jurisdiction to amend or modify any allocation of water to the parties. Absent
10 the ability to modify the Judgment any decision related to this prove-up proceeding or to the
11 evidence at all will be illusory, misguided, and advisory.
12

13 Finally, as the result of the late assertion of Robar’s claims, the Willis Class was never
14 permitted to conduct discovery, consider retaining experts, or evaluate the claims made by the
15 Robar parties. For these reasons, the Willis Class objects to the proceeding and will not participate.
16

17 Respectfully submitted,
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20 Dated: May 19, 2016 KRAUSE KALFAYAN BENINK & SLAVENS, LLP
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23 By: /s/ Ralph B. Kalfayan
24 Ralph B. Kalfayan, Esq.
25 Class Counsel for the Willis Class
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