1 2 3 4 5 6 7 8 9 10	Michael D. McLachlan (State Bar No. 181 LAW OFFICES OF MICHAEL D. Mc 44 Hermosa Avenue Hermosa Beach, California 90254 Phone: (310) 954-8270; Fax: (310) 954-8271 Daniel M. O'Leary (State Bar No. 175128) LAW OFFICE OF DANIEL M. O'LEA 2300 Westwood Boulevard, Suite 105 Los Angeles, California 90064 Phone: (310) 481-2020; Fax: (310) 481-0049 Attorneys for Plaintiff Richard Wood and	LACHLAN, APC
12	SUPERIOR COURT FOR THE STATE OF CALIFORNIA	
13	COUNTY OF LOS ANGELES	
14 15 16 17 18 19 20 21 22 23 24	Coordination Proceeding Special Title (Rule 1550(b)) ANTELOPE VALLEY GROUNDWATER CASES RICHARD A. WOOD, an individual, on behalf of himself and all others similarly situated, Plaintiff, v. LOS ANGELES COUNTY WATERWORKS DISTRICT NO. 40; et al. Defendants.	Judicial Council Coordination Proceeding No. 4408 (Honorable Jack Komar) Case No.: BC 391869 DECLARATION OF MICHAEL D. MCLACHLAN IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENT Date: March 26, 2015 Time: 10:00 a.m. Dept: Room 222
	Defendants.	
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DECLARATION OF MICHAEL D. MCLACHLAN IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENT

DECLARATION OF MICHAEL D. MCLACHLAN

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I make this declaration of my own personal knowledge, except where 1. stated on information and belief, and if called to testify in Court on these matters,

I could do so competently.

I, Michael D. McLachlan, declare:

I am co-counsel of record of record for Plaintiff Richard Wood and 2. the Class, and am duly licensed to practice law in California. I make this declaration in support of the joint motion for preliminary approval of the settlement agreement.

- This action has been litigated vigorously on behalf of the Class for 3. nearly seven years. There has been extensive written discovery, depositions, trial testimony, and class counsel have reviewed thousands of pages of evidence, deposition transcripts, and expert witness reports, in addition to conducting extensive legal research and analysis regarding all of the relevant legal claims of the Class and the Settling Defendants. Class counsel have also spoken to in excess of 300 class members over the past seven years, and through those calls have gained substantial insight into the water use of the Class.
- The Settlement Agreement was negotiated at arm's-length over six 4. years. Settlement negotiations commenced formally in February of 2009, and continued until February of 2015, ultimately resulting in the attached Settlement Agreement. These negotiations included two separate mediations with Justice Ronald Robie, and literally hundreds of meetings, phone calls, and e-mails.
- No attorneys' fees or costs were agreed upon and those issues had no 5. bearing whatsoever on the relief for the Class.
- Attached as Exhibit 1 is a true and correct copy of the Settlement 6. Agreement approved and executed by all parties to the Small Pumper Class

DECLARATION OF MICHAEL D. MCLACHLAN IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENT

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Stipulation of Settlement. Exhibit A to this Agreement is the Stipulation for Entry of Judgment and Physical Solution, which had been signed by more than 120 parties to this coordinated proceeding.

- 7. Attached as Exhibit 2 is a true and correct copy of the proposed notice to the class.
- 8. Attached as Exhibit 3 is a true and correct copy of the proposed summary notice to the class, to be published in local newspapers as set forth in the Settlement Agreement.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 4th day of March, 2015, at Hermosa Beach, California.



Michael D. McLachlan

DECLARATION OF MICHAEL D. MCLACHLAN IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENT