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5 LOS ANGELES COUNTY WATERWORKS
DISTRICT NO. 40

**EXEMPT FROM FILING FEES
UNDER GOVERNMENT CODE
SECTION 6103**

6 OFFICE OF COUNTY COUNSEL
7 COUNTY OF LOS ANGELES
JOHN F. KRATTLI, Bar No. 82149
8 COUNTY COUNSEL
WARREN WELLEN, Bar No. 139152
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500 WEST TEMPLE STREET
10 LOS ANGELES, CALIFORNIA 90012
TELEPHONE: (213) 974-8407
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12 Attorneys for Cross-Complainant LOS ANGELES
COUNTY WATERWORKS DISTRICT NO. 40

13
14 SUPERIOR COURT OF THE STATE OF CALIFORNIA
15 COUNTY OF LOS ANGELES – CENTRAL DISTRICT

16 ANTELOPE VALLEY GROUNDWATER
CASES

Judicial Council Coordination Proceeding
No. 4408

17 Included Actions:

CLASS ACTION

18 Los Angeles County Waterworks District No.
40 v. Diamond Farming Co., Superior Court of
19 California, County of Los Angeles, Case No.
BC 325201;

Santa Clara Case No. 1-05-CV-049053
Assigned to the Honorable Jack Komar

20 Los Angeles County Waterworks District No.
21 40 v. Diamond Farming Co., Superior Court of
California, County of Kern, Case No. S-1500-
22 CV-254-348;

LOS ANGELES COUNTY
WATERWORKS DISTRICT NO. 40
MOTION TO STAY *WOOD V. COUNTY
OF LOS ANGELES*, LOS ANGELES
COUNTY SUPERIOR COURT CASE NO.
BS143790, PENDING A
DETERMINATION ON PETITION FOR
ADD-ON CASE; MEMORANDUM OF
POINTS AND AUTHORITIES;
DECLARATION OF JEFFREY V. DUNN

23 Wm. Bolthouse Farms, Inc. v. City of
Lancaster, Diamond Farming Co. v. City of
24 Lancaster, Diamond Farming Co. v. Palmdale
Water Dist., Superior Court of California,
25 County of Riverside, Case Nos. RIC 353 840,
RIC 344 436, RIC 344 668;

[Filed concurrently with [Proposed] Order]

26 RICHARD WOOD, on behalf of himself and
27 all other similarly situated v. A.V. Materials,
Inc., et al., Superior Court of California,
28 County of Los Angeles, Case No. BC509546.

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 Pursuant to California Rules of Court, Rule 3.515 and Code of Civil Procedure Section
3 404.5, Los Angeles County Waterworks District No. 40 ("District No. 40") hereby moves this
4 Court for an order staying all proceedings in the following case pending this Court's
5 determination on whether the following case should be included in the Antelope Valley
6 Groundwater Cases, Judicial Council Coordination Proceeding No. 4408:

7 *Richard Wood v. County of Los Angeles*, Los Angeles County Superior Court Case No.
8 BS143790 (the "Proposed Add-On Proceeding").

9 This Motion for Stay is made on the following grounds:

- 10
- 11 • the stay will promote the interests of justice;
 - 12 • the stay is unlikely to materially affect the status of the action stayed;
 - 13 • a decision in either these coordination proceedings or in the Proposed Add-On
14 Proceeding that Richard Wood's actions are in violation of this Court's discovery
15 orders will likely have collateral estoppel effect on the other matter; and
 - 16 • a stay order is necessary and appropriate to effectuate the purposes of
17 coordination.


18 Other than the Antelope Valley Groundwater Cases, District No. 40 is unaware of any
19 pending actions that are related to the Proposed Add-On Proceeding. (Declaration of Jeffrey V.
20 Dunn ("Dunn Decl."), at ¶2.)

21 This Motion for Stay will be based upon this Motion for Stay, the attached Memorandum
22 of Points and Authorities, the attached Declaration of Jeffrey V. Dunn, all pleadings, documents,
23 and evidence on file in this action, and on any other matters properly before the Court.

24 Dated: October 8, 2013

BEST BEST & KRIEGER LLP

25 By


ERIC L. GARNER

JEFFREY V. DUNN

Attorneys for Cross-Complainant

LOS ANGELES COUNTY WATERWORKS
DISTRICT NO. 40

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 Los Angeles County Waterworks District No. 40 (“District No. 40”) respectfully submits
3 the following Memorandum of Points and Authorities in Support of its Motion to Stay all
4 proceedings in the following case until this Court makes a determination on District No. 40’s
5 Petition to Add-On the following case to the Antelope Valley Groundwater Cases, Judicial
6 Council Coordination Proceeding No. 4408:

7 *Richard Wood v. County of Los Angeles*, Los Angeles County Superior Court Case No.
8 BS143790 (the “Proposed Add-On Proceeding”).

9 On July 2, 2013, Richard Wood—a party to these coordinated cases—initiated the
10 Proposed Add-On Proceeding, which seeks to compel production of documents responsive to
11 attorney Michael D. McLachlan’s Public Records Act request, dated April 9, 2013, to the County
12 of Los Angeles (“PRA Request”).¹ (See Dunn Decl. at ¶3, Ex. A.) While the PRA Request sought
13 the County’s records concerning the Antelope Valley Groundwater Cases, no effort was made by
14 either Mr. McLachlan, who issued the PRA Request, or Mr. Wood, who initiated the Proposed
15 Add-On Proceeding, to contact the County’s counsel of record in the Antelope Valley
16 Groundwater Cases regarding the requested information. (*Id.* at ¶¶3 & 4, Ex. A.) On September
17 13, 2013, District No. 40 filed its petition to include the Proposed Add-On Proceeding in the
18 Antelope Valley Groundwater Cases on the grounds that the PRA Request and the Proposed Add-
19 On Proceeding constitute “an improper attempt by the Wood Class to circumvent this Court’s
20 discovery orders and to propound discovery relating to” this coordinated proceeding.² (*Id.* at ¶3,
21 Ex. A.) Specifically, the Court permitted limited discovery and ordered the parties to meet and
22 confer prior to initiating discovery requests, which Messrs. Wood and McLachlan failed to do. To
23 date, the Court has not ruled on District No. 40’s petition.

24 Pursuant to section 404.5 of the Code of Civil Procedure, “[p]ending any determination of
25 whether coordination is appropriate, the judge making that determination may stay any action

26 ¹ It is questionable whether Mr. Wood has standing to bring the writ proceeding as the PRA Request was submitted by
27 Mr. McLachlan.

28 ² District No. 40 also suspects that the Proposed Add-On Proceeding was initiated as an attempt by Mr. McLachlan to
gain negotiation advantages while parties in the Antelope Valley Groundwater Cases are engaged in settlement
discussions.

1 being considered for, or affecting an action being considered for, coordination.” The request may
2 be made in the petition for coordination or in a separately filed motion. (Rules of Court, Rule
3 3.515.)

4 As the Antelope Valley Groundwater Cases and the Proposed Add-On Proceeding concern
5 this Court’s discovery orders and share common questions of law and facts, District No. 40’s
6 petition to include the Proposed Add-On Proceeding serves the purposes of coordination, which
7 include increasing judicial and litigation efficiency, reducing possibility of duplicative and/or
8 inconsistent rulings, orders or judgments, and encouraging settlement. (*See* Code Civ. Proc. §
9 404.1.) To allow the Proposed Add-On Proceeding to proceed any further would defeat these
10 purposes, deny this Court a chance to consider District No. 40’s petition, risk having duplicative
11 and inconsistent rulings, and discourage agreement and/or settlement regarding, in essence, a
12 discovery dispute.

13 As of the date of this filing, no hearing has taken place in the Proposed Add-On
14 Proceeding, and only Plaintiff Wood has appeared in that proceeding. (Dunn Decl. at Ex. B.)
15 However, a trial setting conference has been scheduled on October 15, 2013 before Judge James
16 Chalfant in Department 85 of the Los Angeles Superior Court. (*Id.*) At that hearing, District No.
17 40 expects Judge Chalfant to set forth the briefing schedules, trial date, and other pre-trial
18 deadlines. (Dunn Decl. at ¶ 6.) Once those dates are set, the parties in the Proposed Add-On
19 Proceeding will be forced to engage in expensive endeavors of preparing the administrative record,
20 writing briefs and preparing for the hearing on the merit. The benefit of judicial and litigation
21 efficiency will be lost as the parties prepare for the final hearing. Moreover, while it is impossible
22 to predict Judge Chalfant’s final ruling in the Proposed Add-On Proceeding, there is a chance
23 Judge Chalfant’s ruling may contradict this Court’s discovery orders and may encourage other
24 parties in this coordinated proceeding to engage in similarly bad faith discovery conduct.

25 An immediate stay order is necessary to effectuate the purposes of coordination and to
26 afford this Court an opportunity to consider District No. 40’s petition before Judge Chalfant orders
27 the parties in the Proposed Add-On Proceeding to prepare for trial. As stated above, the stay will
28 promote the ends of justice. As only Plaintiff Wood has appeared in the Proposed Add-On

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IRVINE, CALIFORNIA 92612

1 Proceeding and no pre-trial deadlines or trial date has yet been set in that proceeding, District No.
2 40 is unaware of any material effect a temporary stay would have on the Proposed Add-On
3 Proceeding. (Dunn Decl. at ¶ 7.) Furthermore, a decision by either this Court or Judge Chalfant
4 that the PRA Request violates this Court's discovery orders will likely have a collateral estoppel
5 effect on the other matter. Consequently, a stay order is required to allow this Court time to
6 review District No. 40's petition and to ensure that the purposes of coordination are effectuated.

7 For the reasons stated above, District No. 40 respectfully requests this Court to issue an
8 order to stay the Proposed Add-On Proceeding until this Court determines whether to include the
9 Proposed Add-On Proceeding in this coordinated proceeding.

10 Dated: October 8, 2013

BEST BEST & KRIEGER LLP

11 By Jeffrey V. Dunn /w.w.
12 ERIC L. GARNER
13 JEFFREY V. DUNN
14 Attorneys for Cross-Complainant
15 LOS ANGELES COUNTY WATERWORKS
16 DISTRICT NO. 40
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7. I am not aware of any material effect that a temporary stay order would have on the Proposed Add-On Proceeding.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 8th day of October, 2013, at Irvine, California.



JEFFREY V. DUNN

LAW OFFICES OF
BEST BEST & KRIEGER LLP
18101 VON KARMAN AVENUE, SUITE 1000
IRVINE, CALIFORNIA 92612

EXHIBIT A

1 BEST BEST & KRIEGER LLP
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Attorneys for Cross-Complainant
5 LOS ANGELES COUNTY WATERWORKS
DISTRICT NO. 40

**EXEMPT FROM FILING FEES
UNDER GOVERNMENT CODE
SECTION 6103**

6 OFFICE OF COUNTY COUNSEL
7 COUNTY OF LOS ANGELES
JOHN F. KRATTLI, Bar No. 82149
8 COUNTY COUNSEL
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9 PRINCIPAL DEPUTY COUNTY COUNSEL
500 WEST TEMPLE STREET
10 LOS ANGELES, CALIFORNIA 90012
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Attorneys for Cross-Complainant LOS ANGELES
12 COUNTY WATERWORKS DISTRICT NO. 40

13
14 SUPERIOR COURT OF THE STATE OF CALIFORNIA
15 COUNTY OF LOS ANGELES – CENTRAL DISTRICT

16 ANTELOPE VALLEY GROUNDWATER
CASES
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18 Included Actions:
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19 California, County of Los Angeles, Case No.
BC 325201;
20
Los Angeles County Waterworks District No.
21 40 v. Diamond Farming Co., Superior Court of
California, County of Kern, Case No. S-1500-
22 CV-254-348;
23
Wm. Bolthouse Farms, Inc. v. City of
Lancaster, Diamond Farming Co. v. City of
24 Lancaster, Diamond Farming Co. v. Palmdale
Water Dist., Superior Court of California,
25 County of Riverside, Case Nos. RIC 353 840,
RIC 344 436, RIC 344 668
26
RICHARD WOOD, on behalf of himself and
27 all other similarly situated v. A.V. Materials,
Inc., et al., Superior Court of California,
28 County of Los Angeles, Case No. BC509546

Judicial Council Coordination Proceeding
No. 4408

CLASS ACTION

Santa Clara Case No. 1-05-CV-049053
Assigned to the Honorable Jack Komar

PETITION FOR ADD-ON CASE;
DECLARATION OF JEFFREY V. DUNN

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TO THE COURT, ALL PARTIES, AND ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that cross-complainant Los Angeles County Waterworks District No. 40 hereby petitions this Court for an Order that the following case be an “add on” case to the Antelope Valley Groundwater Cases, Judicial Council Coordination Proceeding No. 4408:

Richard Wood v. County of Los Angeles, Los Angeles County Superior Court Case No. BS143790.

The petition for writ of mandate in the above “add on” case seeks to compel production of documents responsive to attorney Michael D. McLachlan’s Public Records Act request to the County of Los Angeles, which sought records concerning the Antelope Valley Groundwater Cases. Specifically, Petitioner Wood is requesting that the County of Los Angeles produce, among others:

- (a) “Records showing the total amount paid to [Best Best & Krieger, LLP] for its work in connection with the Antelope Valley Groundwater Cases”; (b) “All contracts for services between the County and Luhdorff & Scalmanini Consulting Engineers (“LSCE”) including all revisions and amendments thereto since January 1, 2003”; and (c) “All invoices or other requests for payment submitted to the County by or on behalf of LSCE for payment since January 1, 2003.”

(Declaration of Jeffrey V. Dunn, Ex. “A” at Ex. A [emphasis in original].) Mr. McLachlan’s Public Records Act request and the petition for writ of mandate is an improper attempt by the Wood Class to circumvent this Court’s discovery orders and to propound discovery relating to the Antelope Valley Groundwater Cases, Judicial Council Coordination Proceeding No. 4408.

(Declaration of Jeffrey V. Dunn, ¶¶ 2-4.)

No hearing is required under Rule of Court 3.544 unless ordered by the Coordination Trial Judge. Pursuant to Rule of Court 3.544, subdivision (b), 10 days after service of this Petition, any party may serve and submit a notice of opposition to this Petition.

Dated: September 13 2013

BEST BEST & KRIEGER LLP
 By Jeffrey V. Dunn/w.v.
 ERIC L. GARNER
 JEFFREY V. DUNN
 Attorneys for Cross-Complainant
 LOS ANGELES COUNTY WATERWORKS
 DISTRICT NO. 40

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DECLARATION OF JEFFREY V. DUNN

I, Jeffrey V. Dunn, declare as follows:

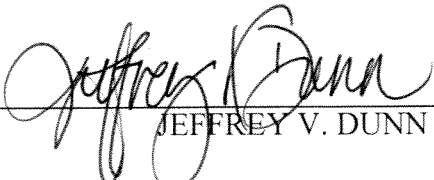
1. I am an attorney duly licensed to practice before all courts of the State of California. I am an attorney of record for Los Angeles County Waterworks District No. 40 (“District No. 40”) for the Antelope Valley Groundwater Cases, Judicial Council Coordination Proceeding 4408. The following is based on my personal knowledge and if called as a witness, I could and would testify competently thereto.

2. Pursuant to the requirements set forth in Rule of Court 3.544, I submit that the case of *Richard Wood v. County of Los Angeles*, Los Angeles County Superior Court Case No. BS143790 is an “add on” case for the Antelope Valley Groundwater Cases, Judicial Council Coordination Proceeding 4408 because the “add on” case seeks compel production of documents relating to the Antelope Valley Groundwater Cases, Judicial Council Coordination Proceeding No. 4408. Mr. Wood is requesting that the County of Los Angeles produce, among others: (a) “Records showing the total amount paid to [Best Best & Krieger, LLP] for its work in connection with the Antelope Valley Groundwater Cases”; (b) “All contracts for services between the County and Luhdorff & Scalmanini Consulting Engineers (“LSCE”) including all revisions and amendments thereto since January 1, 2003”; and (c) “All invoices or other requests for payment submitted to the County by or on behalf of LSCE for payment since January 1, 2003.”

3. LSCE performed work for District No. 40 for the Antelope Valley Groundwater Cases, Judicial Council Coordination Proceeding 4408.

4. Attached as Exhibit “A” is a true and correct copy of the “add on” case petition.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 13th day of September, 2013, at Irvine, California.



JEFFREY V. DUNN

26345.00000\8206283.1

1 **PROOF OF SERVICE**

2 I, Sandra K. Sandoval, declare:

3 I am a resident of the State of California and over the age of eighteen years, and not a
4 party to the within action; my business address is Best Best & Krieger LLP, 300 South Grand
5 Avenue, 25th Floor, Los Angeles, CA 90071. On September 13, 2013, I served the following
6 document(s):

7 **PETITION FOR ADD-ON CASE; DECLARATION OF JEFFREY V.
8 DUNN**

9 **To all parties appearing in Judicial Council Coordination Proceeding No. 4408** by
10 posting the document(s) listed above to the Santa Clara County Superior Court e-filing website
11 (<http://www.scefiling.org>) under the Antelope Valley Groundwater matter pursuant to the
12 Court's Order dated October 27, 2005

13 **To Petitioner Richard Wood: By United States mail.** I enclosed the documents in a
14 sealed envelope or package addressed to the persons at the addresses listed below (specify one):

11 Michael D. McLachlan
12 LAW OFFICES OF MICHAEL D.
13 McLACHLAN, APC
14 10490 Santa Monica Boulevard
15 Los Angeles, California 90025
16 Tel: (310) 954-8270 Fax: (310) 954-8271
17 Email: mike@mclachlanlaw.com

Daniel M. O'Leary
LAW OFFICE OF DANIEL M.
O'LEARY
10490 Santa Monica Boulevard
Los Angeles, California 90025
Tel: (310) 481-2020 Fax: (310) 481-0049
dan@danolearylaw.com

15 Placed the envelope for collection and mailing, following our ordinary business practices.
16 I am readily familiar with this business's practice for collecting and processing correspondence for
17 mailing. On the same day that correspondence is placed for collection and mailing, it is deposited
18 in the ordinary course of business with the United States Postal Service, in a sealed envelope with
19 postage fully prepaid

20 **To Chair, Judicial Council of California: By e-mail or electronic transmission.** I
21 caused the documents to be sent to the persons at the e-mail addresses listed below. I did not
22 receive, within a reasonable time after the transmission, any electronic message or other
23 indication that the transmission was unsuccessful.

24 Chair, Judicial Council of California
25 Administrative office of the Courts
26 Attn: Appellate & Trial Court Judicial Services
27 (Civil Case Coordination)
28 455 Golden Gate Avenue
San Francisco, CA 94102-3688
Email: coordination@jud.ca.gov

I declare under penalty of perjury under the laws of the State of California that the above
is true and correct. Executed on September 13, 2013, at Los Angeles, California.

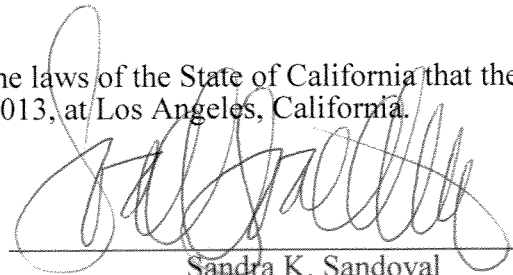

Sandra K. Sandoval

EXHIBIT A

911803
ALW 1

1 Michael D. McLachlan (State Bar No. 181705)
2 LAW OFFICES OF MICHAEL D. McLACHLAN, APC
3 10490 Santa Monica Boulevard
4 Los Angeles, California 90025
5 Telephone: (310) 954-8270
6 Facsimile: (310) 954-8271
7 mike@mclachlanlaw.com

FILED
LOS ANGELES SUPERIOR COURT

JUL 02 2013

JOHN A. CLARKE, CLERK
BY *[Signature]* DEPUTY

5 Daniel M. O'Leary (State Bar No. 175128)
6 LAW OFFICE OF DANIEL M. O'LEARY
7 10490 Santa Monica Boulevard
8 Los Angeles, California 90025
9 Telephone: (310) 481-2020
10 Facsimile: (310) 481-0049
11 dan@danolearylaw.com

12 Attorneys for Petitioner Richard Wood

1985 James Chalkant

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

BS143790

16 RICHARD A. WOOD,
17
18 Petitioner,
19 v.
20 COUNTY OF LOS ANGELES,
21 Respondent.

Case No.:
PETITION FOR WRIT OF
MANDATE TO COMPEL RELEASE
OF PUBLIC RECORDS AND
COMPLIANCE WITH CALIFORNIA
PUBLIC RECORDS ACT
[GOV. CODE § 6250 *et seq.*]

CITY/CASE #: BS143790
LEA/DEF #:
RECEIPT #: CCH503057150
DATE PAID: 07/02/13 12:27 PM
PAYMENT: \$435.00 310
RECEIVED:
CHECK: \$435.00
CASH: \$0.00
CHANGE: \$0.00
CARD: \$0.00

07/02/2013

1 receipt, is attached hereto as Exhibit A. Petitioner requested access to 8 categories of
2 documents.

3 7. On June 25, 2013, the County denied the request for access in its entirety,
4 but stated that it did have records responsive to 5 of the 8 categories of records at issue.
5 A true and correct copy of the County's denial letter is attached hereto as Exhibit B.
6

7 **REASONS FOR GRANTING THE PETITION**

8 8. Government Code section 6253, subdivision (b), requires a local agency,
9 such as the County, which receives a request for a copy of public records that reasonably
10 describes an identifiable record or records, to make the records promptly available upon
11 payment of fees covering direct costs of duplication or a statutory fee, if applicable. The
12 only exception is for records that are exempt from disclosure by express provisions of
13 law. Government Code section 6253, subdivision (a), provides in essence that public
14 records are open to inspection at all times during the office hours of a local agency, and
15 every person has the right to inspect any public record, except for records that are exempt
16 from disclosure by express provisions of law. Furthermore under Government Code
17 section 6253, subdivision (a), any reasonably segregable portion of a record shall be
18 available for inspection by any person requesting the record after deletion of the portions
19 that are exempted by law.

20 9. The writings described in paragraph Exhibit A to this petition are public
21 records as defined by the California Public Records Act because they contain information
22 relating to the conduct of the public's business. Petitioner is informed and believes, and
23 on the basis of such information and belief alleges, that none of the requested records is
24 exempt from disclosure. Such records, including attorney fee bills, have been held to be
25 subject to disclosure under the Public Records Act. (*County of Los Angeles v. Superior*
26 *Court* (2012) 211 Cal.App.4th 57, 67.)

27 10. Access to the requested records is in furtherance of the public's interest, in
28 that the public has a right to be informed whether the affairs of the County are being

07/02/2013

1 administered fairly and efficiently. There are no administrative exhaustion requirements
2 under the Act.

3 11. Petitioner has no plain, speedy, and adequate remedy at law other than this
4 proceeding. The petition is specifically authorized under Government Code sections
5 6258 and 6259.

6 12. Petitioner contends that the County's refusal to provide the requested
7 records is unjustified and violates the California Public Records Act. Respondent admits
8 to withholding various pertinent records that are responsive to petitioner's request.
9 (Exhibit B, p. 2.) Respondent has not established that any public interest in
10 nondisclosure of any requested record outweighs the public's interest in the writing's
11 disclosure, or that it is impossible to redact information, if any, that respondent is
12 legitimately entitled to withhold, while giving the public access to the remainder of the
13 requested records. The requested records bear upon the County's administration of its
14 Waterworks operations in the Antelope Valley. That is a matter which affects all of the
15 taxpayers of Los Angeles County.

16
17 **PRAYER FOR RELIEF**

18 Petitioner prays for relief as follows:

19 1. That this Court issue a peremptory writ of mandate commanding
20 Respondent to give Petitioner access to all requested records in their possession, custody,
21 or control.

22 2. Alternatively, if the writings are not required to be released immediately,
23 that this Court issue an alternative writ of mandate commanding Respondent to give
24 Petitioner access to all requested records in their possession, custody, or control, or, in the
25 alternative, to show cause before this Court at a time and place then or thereafter
26 specified by Court order, why they have not done so and why a peremptory writ should
27 not issue; and on the return of the alternative writ and hearing on the order to show cause,
28 a peremptory writ of mandate compelling Respondent to perform its public duty as set

0710212013

1 forth above.


2 3. If the Court issues the alternative writ, that the Court review the requested
3 records in camera, pursuant to Government Code section 6259, subdivision (a), to
4 determine whether any exemption applies.

5 4. That the Court award Petitioner reasonable attorney fees and court costs
6 under Government Code section 6259, subdivision (d).

7 5. That the Court grant Petitioner such other and further relief as the Court
8 deems just.

9
10 DATED: July 1, 2013

LAW OFFICES OF MICHAEL D. McLACHLAN
LAW OFFICE OF DANIEL M. O'LEARY

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13 By: 
14 Michael D. McLachlan
15 Attorneys for Petitioner
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VERIFICATION

I am the petitioner. I have read the above Petition for Writ of Mandate and know its contents. The information supplied therein is based on my own personal knowledge and/or has been supplied by my attorneys or other agents and is therefore provided as required by law. The information contained in the foregoing document is true, except as to matters which were provided by my attorneys or other agents, and, as to those matters, I am informed and believe that they are true.

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

Richard A. Wood

Richard A. Wood

07/02/2013

07/02/2013

LAW OFFICES OF MICHAEL D. McLACHLAN

A PROFESSIONAL CORPORATION
10490 SANTA MONICA BOULEVARD
LOS ANGELES, CA 90025
PHONE 310-954-8270 FAX 310-954-8271
E-MAIL mike@mclachlanlaw.com

April 9, 2013

VIA CERTIFIED MAIL – RETURN RECEIPT

Department of Public Works
County of Los Angeles
900 S. Fremont
Alhambra, CA 91803

Re: California Public Records Act Request

Dear Sir or Madam:

Pursuant to Government Code section 6250 et seq., we hereby request disclosure of the following records within ten days from the date hereof:

1. All contracts for services between the County of Los Angeles, or any political subdivision of the County ("County") and Best, Best & Krieger, LLP ("BBK") including all revisions and amendments thereto since January 1, 2003.
2. All invoices or other requests for payment submitted to the County by or on behalf of BBK for payment since January 1, 2003.
3. All minutes and resolutions of the Board of Supervisors of the County approving payment to BBK since January 1, 2003.
4. Records showing the total amount paid to BBK for its work in connection with the Antelope Valley Groundwater Cases, Judicial Council Coordination Proceeding No. 4408, including all cases consolidated therewith.
5. All contracts for services between the County and Lohdorff & Scalmanini Consulting Engineers ("LSCE") including all revisions and amendments thereto since January 1, 2003.
6. All invoices or other requests for payment submitted to the County by or on behalf of LSCE for payment since January 1, 2003.

07/09/2013

BA

Department of Public Works
County of Los Angeles
April 9, 2013
Page 2

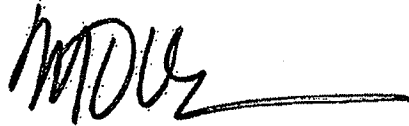
7. All minutes and resolutions of the Board of Supervisors of the County approving payment to LSCE since January 1, 2003.

8. All Statements of Economic Interest (Cal. Form 700) for years 2003 through 2012, inclusive, for BBK attorneys Jeffrey Dunn and Eric Garner.

We agree to pay the direct costs of duplication in an amount not to exceed \$400.00. If the costs of duplication will exceed \$400.00, please contact the undersigned for further authorization.

If any portion of this request is denied, set forth in writing the names and titles or positions of each person responsible for the denial.

Very truly yours,

A handwritten signature in black ink, appearing to read 'MDL', followed by a horizontal line extending to the right.

Michael D. McLachlan

07100212013

07/02/2013

EXHIBIT B



COUNTY OF LOS ANGELES
OFFICE OF THE COUNTY COUNSEL

648 KENNETH HAHN HALL OF ADMINISTRATION
500 WEST TEMPLE STREET
LOS ANGELES, CALIFORNIA 90012-2713

TELEPHONE
(213) 974-1828
FACSIMILE
(213) 626-2105
TDD
(213) 633-0901

JOHN F. KRATTLI
County Counsel

June 25, 2013

Michael D. McLachlan, Esq.
Law Offices of Michael D. McLachlan
10490 Santa Monica Blvd.
Los Angeles, California 90025

Re: Public Records Act Request Dated April 9, 2013

Dear Mr. McLachlan:

This letter responds to your April 9, 2013, public records request seeking the following information:

1. All contracts for services between the County of Los Angeles, or any political subdivision of the County ("County") and Best, Best & Krieger, LLP ("BBK") including all revisions and amendments thereto since January 1, 2003.
2. All invoices or other requests for payment submitted to the County by or on behalf of BBK for payment since January 1, 2003.
3. All minutes and resolutions of the Board of Supervisors of the County approving payment to BBK since January 1, 2003.
4. Records showing the total amount paid to BBK for its work in connection with the Antelope Valley Groundwater Cases, Judicial Council Coordination Proceeding No. 4408, including all cases consolidated therewith.
5. All contracts for services between the County and Luhdorff & Scalmanini Consulting Engineers ("LSCE") including all revisions and amendments thereto since January 1, 2003.
6. All invoices or other requests for payment submitted to the County by or on behalf of LSCE for payment since January 1, 2003.

07/02/2013

RB

Michael D. McLachlan, Esq.

June 25, 2013

Page 2

7. All minutes and resolutions of the Board of Supervisors of the County approving payment to LSCE since January 1, 2003.

8. All Statements of Economic Interest (Cal. Form 700) for years 2003 through 2012, inclusive, for BBK attorneys Jeffrey Dunn and Eric Garner.

After reviewing our records, we have determined that there are records that are responsive to the following requests: 1, 2, 4, 5, and 6. We do not possess records responsive the other requests you have made.

Please be advised that the involved responsive documents are exempt from production on the following grounds. The documents and information potentially responsive to your request (in particular, the detailed description, timing, and amount of attorney and consultant work performed, which communicates to the client and discloses attorney strategy, tactics, thought processes and analysis) are exempt from disclosure pursuant to Government Code sections 6254(k) and 6255(a).

The County of Los Angeles and Los Angeles County Waterworks District No. 40 acquired the requested information for purposes including, without limitation, ongoing litigation, pursuant to the contract for legal services with the law firm in question and the contract for consulting services with the consultant in question. The requested information is privileged under the official information privilege pursuant to Evidence Code section 1040, the attorney-client and attorney-work product privileges pursuant to Evidence Code sections 952, 954, and Code of Civil Procedure section 2018, *et. seq.*, and constitutes confidential communications pursuant to Business and Professions Code section 6149.

Additionally, your requests lack foundation and are vague, ambiguous, and unintelligible. Further, your requests appear to be, among other things, an improper attempt to conduct discovery aimed at District 40 in the Antelope Valley Groundwater Cases in circumvention of Judge Komar's discovery and case management orders. To extent that these requests are tantamount to discovery requests in the groundwater adjudication, they improperly seek discovery of information which is irrelevant, protected by the privileges referred to above, and not calculated to lead to the discovery of admissible evidence.

07/02/2013

Michael D. McLachlan, Esq.
June 25, 2013
Page 3

You did not address your request to my attention even though you have long been aware that I represent the County of Los Angeles and Los Angeles County Waterworks District No. 40. As a matter of professional courtesy, I request that you copy me with all communications to my clients that bear any relationship to the Antelope Valley Groundwater Adjudication or any other matters that you believe I am handling.

Very truly yours,

JOHN F. KRATTLI
County Counsel

By



WARREN R. WELLEN
Principal Deputy County Counsel
Public Works Division

WW:gm

07/02/2013

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):
Michael D. McLachlan SBN 181705
Law Offices of Michael D. McLachlan, APC
10490 Santa Monica Boulevard, Los Angeles, CA 90025
TELEPHONE NO.: 310-954-8270 FAX NO.: 310-954-8271
ATTORNEY FOR (Name): Plaintiff Richard Wood

FOR COURT USE ONLY
FILED
LOS ANGELES SUPERIOR COURT
JUL 02 2013
JOHN A. CLARKE, CLERK
BY *[Signature]* DEPUTY

SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles
STREET ADDRESS: 111 North Hill Street
MAILING ADDRESS:
CITY AND ZIP CODE: Los Angeles 90012
BRANCH NAME: Central District

CASE NAME:
Richard Wood v. County of Los Angeles

CIVIL CASE COVER SHEET
 Unlimited
(Amount demanded exceeds \$25,000)
 Limited
(Amount demanded is \$25,000 or less)

Complex Case Designation
 Counter **Joinder**
Filed with first appearance by defendant
(Cal. Rules of Court, rule 3.402)

CASE NUMBER: **BS143790**

JUDGE:
DEPT:

Items 1-6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:
- | | | |
|--|---|--|
| <p>Auto Tort</p> <input type="checkbox"/> Auto (22)
<input type="checkbox"/> Uninsured motorist (46)
<p>Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort</p> <input type="checkbox"/> Asbestos (04)
<input type="checkbox"/> Product liability (24)
<input type="checkbox"/> Medical malpractice (45)
<input type="checkbox"/> Other PI/PD/WD (23)
<p>Non-PI/PD/WD (Other) Tort</p> <input type="checkbox"/> Business tort/unfair business practice (07)
<input type="checkbox"/> Civil rights (08)
<input type="checkbox"/> Defamation (13)
<input type="checkbox"/> Fraud (16)
<input type="checkbox"/> Intellectual property (19)
<input type="checkbox"/> Professional negligence (25)
<input type="checkbox"/> Other non-PI/PD/WD tort (35)
<p>Employment</p> <input type="checkbox"/> Wrongful termination (36)
<input type="checkbox"/> Other employment (15) | <p>Contract</p> <input type="checkbox"/> Breach of contract/warranty (06)
<input type="checkbox"/> Rule 3.740 collections (09)
<input type="checkbox"/> Other collections (09)
<input type="checkbox"/> Insurance coverage (18)
<input type="checkbox"/> Other contract (37)
<p>Real Property</p> <input type="checkbox"/> Eminent domain/Inverse condemnation (14)
<input type="checkbox"/> Wrongful eviction (33)
<input type="checkbox"/> Other real property (26)
<p>Unlawful Detainer</p> <input type="checkbox"/> Commercial (31)
<input type="checkbox"/> Residential (32)
<input type="checkbox"/> Drugs (38)
<p>Judicial Review</p> <input type="checkbox"/> Asset forfeiture (05)
<input type="checkbox"/> Petition re: arbitration award (11)
<input checked="" type="checkbox"/> Writ of mandate (02)
<input type="checkbox"/> Other judicial review (39) | <p>Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403)</p> <input type="checkbox"/> Antitrust/Trade regulation (03)
<input type="checkbox"/> Construction defect (10)
<input type="checkbox"/> Mass tort (40)
<input type="checkbox"/> Securities litigation (28)
<input type="checkbox"/> Environmental/Toxic tort (30)
<input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41)
<p>Enforcement of Judgment</p> <input type="checkbox"/> Enforcement of judgment (20)
<p>Miscellaneous Civil Complaint</p> <input type="checkbox"/> RICO (27)
<input type="checkbox"/> Other complaint (not specified above) (42)
<p>Miscellaneous Civil Petition</p> <input type="checkbox"/> Partnership and corporate governance (21)
<input type="checkbox"/> Other petition (not specified above) (43) |
|--|---|--|

2. This case is is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- | | |
|--|--|
| a. <input type="checkbox"/> Large number of separately represented parties | d. <input type="checkbox"/> Large number of witnesses |
| b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. <input type="checkbox"/> Substantial amount of documentary evidence | f. <input type="checkbox"/> Substantial postjudgment judicial supervision |
3. Remedies sought (check all that apply): a. monetary b. nonmonetary; declaratory or injunctive relief c. punitive
4. Number of causes of action (specify): 4
5. This case is is not a class action suit.
6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: July 1, 2013
Michael D. McLachlan
(TYPE OR PRINT NAME)

[Signature]
(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE
Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
File this cover sheet in addition to any cover sheet required by local court rule.
If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

SHORT TITLE:

Richard Wood v. County of Los Angeles

CASE NUMBER

BS143790

CIVIL CASE COVER SHEET ADDENDUM AND STATEMENT OF LOCATION (CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)

This form is required pursuant to Local Rule 2.0 in all new civil case filings in the Los Angeles Superior Court.

Item I. Check the types of hearing and fill in the estimated length of hearing expected for this case:

JURY TRIAL? [X] YES CLASS ACTION? [] YES LIMITED CASE? [] YES TIME ESTIMATED FOR TRIAL 2 [X] HOURS/[] DAYS

Item II. Indicate the correct district and courthouse location (4 steps - If you checked "Limited Case", skip to Item III, Pg. 4):

Step 1: After first completing the Civil Case Cover Sheet form, find the main Civil Case Cover Sheet heading for your case in the left margin below, and, to the right in Column A, the Civil Case Cover Sheet case type you selected.

Step 2: Check one Superior Court type of action in Column B below which best describes the nature of this case.

Step 3: In Column C, circle the reason for the court location choice that applies to the type of action you have checked. For any exception to the court location, see Local Rule 2.0.

Applicable Reasons for Choosing Courthouse Location (see Column C below)

- 1. Class actions must be filed in the Stanley Mosk Courthouse, central district.
2. May be filed in central (other county, or no bodily injury/property damage).
3. Location where cause of action arose.
4. Location where bodily injury, death or damage occurred.
5. Location where performance required or defendant resides.
6. Location of property or permanently garaged vehicle.
7. Location where petitioner resides.
8. Location wherein defendant/respondent functions wholly.
9. Location where one or more of the parties reside.
10. Location of Labor Commissioner Office

Step 4: Fill in the information requested on page 4 in Item III; complete Item IV. Sign the declaration.

Table with 3 columns: A (Civil Case Cover Sheet Category No.), B (Type of Action), and C (Applicable Reasons). Rows include categories like Auto (22), Uninsured Motorist (46), Asbestos (04), Product Liability (24), Medical Malpractice (45), and Other Personal Injury/Property Damage/Wrongful Death (23).

Auto Tort

Other Personal Injury/Property Damage/Wrongful Death Tort

SHORT TITLE:

Richard Wood v. County of Los Angeles

CASE NUMBER

Non-Personal Injury/ Property
Damage/ Wrongful Death Tort

Employment

Contract

Real Property

Unlawful Detainer

A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 3.
Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1., 2., 3.
Defamation (13)	<input type="checkbox"/> A6010 Defamation (slander/libel)	1., 2., 3.
Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1., 2., 3.
Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice	1., 2., 3.
	<input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1., 2., 3.
Other (35)	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	2., 3.
Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1., 2., 3.
Other Employment (15)	<input type="checkbox"/> A6024 Other Employment Complaint Case	1., 2., 3.
	<input type="checkbox"/> A6109 Labor Commissioner Appeals	10.
Breach of Contract/ Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction)	2., 5.
	<input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence)	2., 5.
	<input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud)	1., 2., 5.
	<input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	1., 2., 5.
Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff	2., 5., 6.
	<input type="checkbox"/> A6012 Other Promissory Note/Collections Case	2., 5.
Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1., 2., 5., 8.
Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud	1., 2., 3., 5.
	<input type="checkbox"/> A6031 Tortious Interference	1., 2., 3., 5.
	<input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1., 2., 3., 8.
Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation Number of parcels _____	2.
Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2., 6.
Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure	2., 6.
	<input type="checkbox"/> A6032 Quiet Title	2., 6.
	<input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2., 6.
Unlawful Detainer-Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer-Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer- Post-Foreclosure (34)	<input type="checkbox"/> A6020F Unlawful Detainer-Post-Foreclosure	2., 6.
Unlawful Detainer-Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2., 6.

SHORT TITLE: Richard Wood v. County of Los Angeles	CASE NUMBER
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Judicial Review
 Provisionally Complex Litigation
 Enforcement of Judgment
 Miscellaneous Civil Complaints
 Miscellaneous Civil Petitions

A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2., 6.
Petition re Arbitration (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm/Vacate Arbitration	2., 5.
Writ of Mandate (02)	<input checked="" type="checkbox"/> A6151 Writ - Administrative Mandamus <input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter <input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	2., 8. 2. 2.
Other Judicial Review (39)	<input type="checkbox"/> A6150 Other Writ /Judicial Review	2., 8.
Antitrust/Trade Regulation (03)	<input type="checkbox"/> A6003 Antitrust/Trade Regulation	1., 2., 8.
Construction Defect (10)	<input type="checkbox"/> A6007 Construction Defect	1., 2., 3.
Claims Involving Mass Tort (40)	<input type="checkbox"/> A6006 Claims Involving Mass Tort	1., 2., 8.
Securities Litigation (28)	<input type="checkbox"/> A6035 Securities Litigation Case	1., 2., 8.
Toxic Tort Environmental (30)	<input type="checkbox"/> A6036 Toxic Tort/Environmental	1., 2., 3., 8.
Insurance Coverage Claims from Complex Case (41)	<input type="checkbox"/> A6014 Insurance Coverage/Subrogation (complex case only)	1., 2., 5., 8.
Enforcement of Judgment (20)	<input type="checkbox"/> A6141 Sister State Judgment <input type="checkbox"/> A6160 Abstract of Judgment <input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations) <input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes) <input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax <input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2., 9. 2., 6. 2., 9. 2., 8. 2., 8. 2., 8., 9.
RICO (27)	<input type="checkbox"/> A6033 Racketeering (RICO) Case	1., 2., 8.
Other Complaints (Not Specified Above) (42)	<input type="checkbox"/> A6030 Declaratory Relief Only <input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment) <input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex) <input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)	1., 2., 8. 2., 8. 1., 2., 8. 1., 2., 8.
Partnership Corporation Governance (21)	<input type="checkbox"/> A6113 Partnership and Corporate Governance Case	2., 8.
Other Petitions (Not Specified Above) (43)	<input type="checkbox"/> A6121 Civil Harassment <input type="checkbox"/> A6123 Workplace Harassment <input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case <input type="checkbox"/> A6190 Election Contest <input type="checkbox"/> A6110 Petition for Change of Name <input type="checkbox"/> A6170 Petition for Relief from Late Claim Law <input type="checkbox"/> A6100 Other Civil Petition	2., 3., 9. 2., 3., 9. 2., 3., 9. 2. 2., 7. 2., 3., 4., 8. 2., 9.

SHORT TITLE: Richard Wood v. County of Los Angeles	CASE NUMBER
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Item III. Statement of Location: Enter the address of the accident, party's residence or place of business, performance, or other circumstance indicated in Item II., Step 3 on Page 1, as the proper reason for filing in the court location you selected.

REASON: Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected for this case. <input type="checkbox"/> 1. <input checked="" type="checkbox"/> 2. <input type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input checked="" type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10.			ADDRESS: 900 S. Fremont
CITY: Alhambra	STATE: CA	ZIP CODE: 91803	

Item IV. Declaration of Assignment: I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that the above-entitled matter is properly filed for assignment to the Stanley Mosk courthouse in the Central District of the Superior Court of California, County of Los Angeles [Code Civ. Proc., § 392 et seq., and Local Rule 2.0, subds. (b), (c) and (d)].

Dated: July 1, 2013


 (SIGNATURE OF ATTORNEY/FILING PARTY)

PLEASE HAVE THE FOLLOWING ITEMS COMPLETED AND READY TO BE FILED IN ORDER TO PROPERLY COMMENCE YOUR NEW COURT CASE:

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet, Judicial Council form CM-010.
4. Civil Case Cover Sheet Addendum and Statement of Location form, LACIV 109, LASC Approved 03-04 (Rev. 03/11).
5. Payment in full of the filing fee, unless fees have been waived.
6. A signed order appointing the Guardian ad Litem, Judicial Council form CIV-010, if the plaintiff or petitioner is a minor under 18 years of age will be required by Court in order to issue a summons.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.

10/1/2013

SUMMONS *on Path*
(CITACION JUDICIAL)

**NOTICE TO DEFENDANT:
(AVISO AL DEMANDADO):**
COUNTY OF LOS ANGELES

**YOU ARE BEING SUED BY PLAINTIFF:
(LO ESTÁ DEMANDANDO EL DEMANDANTE):**
RICHARD A. WOOD

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)

FILED

LOS ANGELES SUPERIOR COURT

JUL 02 2013

JOHN A. CLARKE, CLERK

[Signature]
BY AMBER HAYES, DEPUTY

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. **¡AVISO!** Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:
(El nombre y dirección de la corte es): Los Angeles Superior Court
111 North Hill Street, Los Angeles, CA 90012

CASE NUMBER:
(Número del Caso) **BS148790**

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):
Michael D. McLachlan, 10490 Santa Monica Blvd., Los Angeles, CA, 90025; 310-954-8270

DATE: (Fecha) **JUL 02 2013**
Clerk, by **John A. Clarke** (Secretario) **Amber Hayes** Deputy (Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)
(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).

NOTICE TO THE PERSON SERVED: You are served

- as an individual defendant.
- as the person sued under the fictitious name of (specify):
- on behalf of (specify):

under: <input type="checkbox"/> CCP 416.10 (corporation)	<input type="checkbox"/> CCP 416.60 (minor)
<input type="checkbox"/> CCP 416.20 (defunct corporation)	<input type="checkbox"/> CCP 416.70 (conservatee)
<input type="checkbox"/> CCP 416.40 (association or partnership)	<input type="checkbox"/> CCP 416.90 (authorized person)
<input type="checkbox"/> other (specify):	
- by personal delivery on (date):

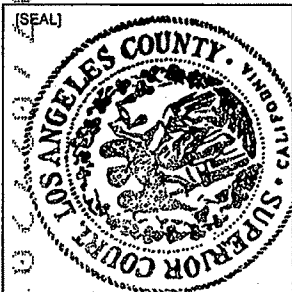


EXHIBIT B

Case Summary

Please make a note of the Case Number.

[Click here to access document images for this case.](#)

If this link fails, you may go to the Case Document Images site and search using the case number displayed on this page.

Case Number: BS143790
RICHARD A WOOD VS COUNTY OF LOS ANGELES

Filing Date: 07/02/2013
Case Type: Writ - Administrative Mandamus (General Jurisdiction)
Status: Pending

Future Hearings

10/15/2013 at 01:30 pm in department 85 at 111 North Hill Street, Los Angeles, CA 90012
Trial Setting Conference

[Documents Filed](#) | [Proceeding Information](#)

Parties

LAW OFFICE OF DANIEL M. O'LEARY - Attorney for Plaintiff/Petitioner

LAW OFFICES OF MICHAEL D. MCLACHLAN APC - Attorney for Plaintiff/Petitioner

LOS ANGELES COUNTY OF - Defendant/Respondent

WOOD RICHARD A. - Plaintiff/Petitioner

[Case Information](#) | [Party Information](#) | [Proceeding Information](#)

Please make a note of the Case Number.

[Click here to access document images for this case.](#)

If this link fails, you may go to the Case Document Images site and search using the case number displayed on this page.

Documents Filed (Filing dates listed in descending order)

07/25/2013 Notice (OF TRIAL SETTING CONFERENCE)
Filed by Attorney for Petitioner

07/23/2013 Proof-Personal Service (Petition, etc.)
Filed by Attorney for Petitioner

07/08/2013 Notice of Trial Setting Conference
Filed by Clerk

07/02/2013 Petition

[Case Information](#) | [Party Information](#) | [Documents Filed](#)

Proceedings Held (Proceeding dates listed in descending order)
None

[Case Information](#) | [Party Information](#) | [Documents Filed](#) | [Proceeding Information](#)

1 **PROOF OF SERVICE**

2 I, Sandra K. Sandoval, declare:

3 I am a resident of the State of California and over the age of eighteen years, and not a
4 party to the within action; my business address is Best Best & Krieger LLP, 300 South Grand
5 Avenue, 25th Floor, Los Angeles, CA 90071. On October 8, 2013, I served the following
6 document(s):

7 **LOS ANGELES COUNTY WATERWORKS DISTRICT NO. 40 MOTION
8 TO STAY WOOD V. COUNTY OF LOS ANGELES PENDING A
9 DETERMINATION ON PETITION FOR ADD-ON CASE;
MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATION OF
JEFFREY V. DUNN**

10 **To all parties appearing in Judicial Council Coordination Proceeding No. 4408** by
11 posting the document(s) listed above to the Santa Clara County Superior Court e-filing website
12 (<http://www.sceffiling.org>) under the Antelope Valley Groundwater matter pursuant to the
13 Court's Order dated October 27, 2005

14 **To the court and all parties appearing in *Wood v. County Of Los Angeles*: by United**
15 **States mail.** I enclosed the documents in a sealed envelope or package addressed to the persons
16 at the addresses listed below (specify one):

17 Michael D. McLachlan
18 LAW OFFICES OF MICHAEL D.
MCLACHLAN, APC
19 10490 Santa Monica Boulevard
Los Angeles, California 90025
20 Tel: (310) 954-8270
Fax: (310) 954-8271
Email: mike@mclachlanlaw.com

Daniel M. O'Leary
LAW OFFICE OF DANIEL M.
O'LEARY
10490 Santa Monica Boulevard
Los Angeles, California 90025
Tel: (310) 481-2020
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dan@danolearylaw.com

21 *Attorneys for Richard Wood*

Attorneys for Richard Wood

22
23 Hon. James C. Chalfant
Los Angeles Superior Court
Department 85
24 111 North Hill Street
Los Angeles, CA 90012

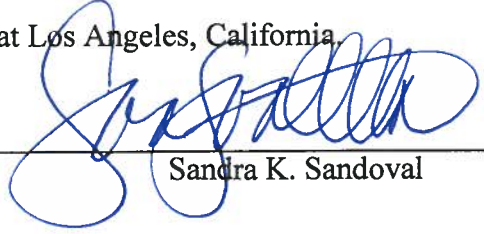
25 Placed the envelope for collection and mailing, following our ordinary business practices.
26 I am readily familiar with this business's practice for collecting and processing correspondence
27 for mailing. On the same day that correspondence is placed for collection and mailing, it is
28

1 deposited in the ordinary course of business with the United States Postal Service, in a sealed
2 envelope with postage fully prepaid

3 **To Chair, Judicial Council of California: By e-mail or electronic transmission.** I
4 caused the documents to be sent to the persons at the e-mail addresses listed below. I did not
5 receive, within a reasonable time after the transmission, any electronic message or other
6 indication that the transmission was unsuccessful.

7 Chair, Judicial Council of California
8 Administrative office of the Courts
9 Attn: Appellate & Trial Court Judicial Services
10 (Civil Case Coordination)
11 455 Golden Gate Avenue
12 San Francisco, CA 94102-3688
13 Email: coordination@jud.ca.gov

14 I declare under penalty of perjury under the laws of the State of California that the above
15 is true and correct. Executed on October 8, 2013, at Los Angeles, California.

16 
17 _____
18 Sandra K. Sandoval

19 26345.00000\8301274.3

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