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SUPERIOR COURT FOR THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

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.

Case No.: BC391869

(related to JUDICIAL COUNCIL
COORDINATION PROCEEDING No.
4408; Santa Clara Case No. 1-05-CV-
049053, Honorable Jack Komar)

**DECLARATION OF MICHAEL D.
MCLACHLAN IN SUPPORT OF EX
PARTE APPLICATION FOR RELIEF
FROM EXPERT DISCLOSURE
DEADLINE AND REQUEST FOR
ORDER TRANSFERRING THIS CASE**

Date: June 25, 2008

Time: 8:15 a.m.

Place: Telephonic/Courtcall

1 I, Michael D. McLachlan, declare:

2 1. I am counsel of record of record for the claimants, and am duly licensed to
3 practice law in California. I make this declaration of my own personal knowledge,
4 except where stated on information and belief, and if called to testify in Court on these
5 matters, I could do so competently.

6 2. At the May 22, 2008 hearing, it was agreed that prior to renewing my
7 motion for appointment of an expert, I would meet with the purveyors lead expert, Mr.
8 Joseph Scaladini. I, along with counsel for the Willis class, Ralph Kalfayan, have made
9 diligent efforts to obtain access to Mr. Scaladini and his report. The first such meeting
10 will not occur until June 27.

11 I declare under penalty of perjury under the laws of the State of California that the
12 foregoing is true and correct. Executed this 24th day of June, 2008, at Los Angeles,
13 California.

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16 Michael D. McLachlan

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