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15 Attorneys for Plaintiff

16 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**
17 **COUNTY OF LOS ANGELES**

18 Coordination Proceeding
19 Special Title (Rule 1550(b))

20 ANTELOPE VALLEY GROUNDWATER
21 CASES

22 RICHARD A. WOOD, an individual, on
23 behalf of himself and all others similarly
24 situated,

25 Plaintiff,

26 v.

27 LOS ANGELES COUNTY
28 WATERWORKS DISTRICT NO. 40; et al.

Defendants.

Judicial Council Coordination
Proceeding No. 4408

(Santa Clara Case No. 1-05-CV-049053,
Honorable Jack Komar)

Case No.: BC 391869

**RICHARD WOOD'S CASE
MANAGEMENT STATEMENT**

Date: March 8, 2010

Time: 10:00 a.m.

Dept.: 1

1 The Public Water Suppliers and the United States are pushing for a trial in July,
2 apparently due to the unavailability of Mr. Scalaminini, their principal expert. The Court
3 should not rush the trial date by a month or two simply to accommodate this expert. In
4 any event, August is likely to be a difficult month for other parties, counsel, and
5 witnesses in regard to summer vacations.

6 Class counsel Daniel O’Leary will be in Hawaii on vacation the last two weeks of
7 July. Class counsel Michael McLachlan will be out of the country the last week of July
8 and the first week of August.

9 Furthermore, it will be nearly impossible for the court-appointed expert to
10 complete the necessary work by April 30, 2010 – the date suggested by the Water
11 Suppliers.

12 The trial should be set for September or October, and a pretrial schedule should be
13 set the affords for earlier designation of experts than provided by the Code of Civil
14 Procedure.

15
16 DATED: March 2, 2010

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

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18
19 By: _____ //s//

20 Michael D. McLachlan
21 Attorneys for Plaintiff
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1 **PROOF OF SERVICE**

2 I am employed in the County of Los Angeles, State of California. I am over the age of 18
3 and am not a party to the within action. My business address is 523 West Sixth Street, Suite 215,
4 Los Angeles, California 90014.

5 On March 3, 2010, I caused the foregoing document(s) described as **RICHARD WOOD'S**
6 **CASE MANAGEMENT STATEMENT** to be served on the parties in this action, as
7 follows:

- 8 (X) (BY ELECTRONIC SERVICE) by posting the document(s) listed above to the Santa
9 Clara County Superior Court website: www.scefilings.org regarding the Antelope Valley
10 Groundwater matter.
11 () (BY U.S. MAIL) I am readily familiar with the firm's practice of collection and
12 processing of documents for mailing. Under that practice, the above-referenced
13 document(s) were placed in sealed envelope(s) addressed to the parties as noted above,
14 with postage thereon fully prepaid and deposited such envelope(s) with the United States
15 Postal Service on the same date at Los Angeles, California, addressed to:
16 () (BY FEDERAL EXPRESS) I served a true and correct copy by Federal Express or other
17 overnight delivery service, for delivery on the next business day. Each copy was
18 enclosed in an envelope or package designed by the express service carrier; deposited in a
19 facility regularly maintained by the express service carrier or delivered to a courier or
20 driver authorized to receive documents on its behalf; with delivery fees paid or provided
21 for; addressed as shown on the accompanying service list.
22 () (BY FACSIMILE TRANSMISSION) I am readily familiar with the firm's practice of
23 facsimile transmission of documents. It is transmitted to the recipient on the same day in
24 the ordinary course of business.
25 (X) (STATE) I declare under penalty of perjury under the laws of the State of California that
26 the above is true and correct.
27 () (FEDERAL) I declare under penalty of perjury under the laws of the United States of
28 America that the foregoing is true and correct.

//s//
Carol Delgado