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SUPERIOR COURT FOR THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

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

Lead Case No. BC 325201

Case No.: BC 391869

**NOTICE OF LODGING OF
AMENDED PROPOSED CASE
MANAGEMENT ORDER FOR
PHASE 5 AND 6 TRIALS AND
LIMITED OPPOSITION TO UNITED
STATES' MOTION TO STAY**

1 **A. THE AMENDED PROPOSE CASE MANAGEMENT ORDER**

2 Plaintiff Richard Wood submits an Amended proposed Case Management Order
3 for Phase 5 and 6 Trials, which is attached here to as Exhibit A. This Amended Order
4 includes input from many parties on the liason committee and otherwise. The
5 amendments clarify the deadlines for disclosure of percipient witnesses, the expert
6 designation process, several poorly chosen dates, and other minor corrections.

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8 **B. THE PHASE 5 TRIAL DATE SHOULD NOT BE CONTINUED, AND IF IT**
9 **IS, THEN SO SHOULD PHASE 6**

10 The United States has filed a motion requesting a continuance of the Phase 5 trial
11 date due to the government shutdown. If this shutdown ceases prior to the hearing on this
12 motion, it should be denied. However, if the shutdown continues, the motion should be
13 granted, but only as to the federal reserved right issues. The claims of return flows
14 should be tried in February as scheduled.

15 If the Court were to continue the Phase 5 Trial date, it should also continue the
16 Phase 6 Trial date for an equivalent period of time. The parties generally agree there
17 should be a ‘blackout’ period on Phase 6 discovery in and around the Phase 5 Trial date
18 so that the parties can focus on that trial. The parties will need considerable time to fully
19 prepare for the prescription trial after the Phase 5 Trial is concluded (even with Phase 6
20 discovery commencing now).

21
22 DATED: October 10, 2013

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25 By: _____
26 Michael D. McLachlan
27 Attorneys for Plaintiff