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13 Attorneys for Plaintiff and the Class

14 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**  
15 **COUNTY OF LOS ANGELES**

16 Coordination Proceeding  
17 Special Title (Rule 1550(b))

18 ANTELOPE VALLEY GROUNDWATER  
19 CASES

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

23 Plaintiff,

24 v.

25 LOS ANGELES COUNTY  
26 WATERWORKS DISTRICT NO. 40; et al.

27 Defendants.

Judicial Council Coordination  
Proceeding No. 4408

(Honorable Jack Komar)

Case No.: BC 391869

**DECLARATION OF MICHAEL D.  
MCLACHLAN REGARDING CLASS  
MEMBERSHIP AFTER PARTIAL  
SETTLEMENT**

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**DECLARATION OF MICHAEL D. MCLACHLAN**

I, Michael D. McLachlan, declare:

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

2. I am co-counsel of record of record for Plaintiff Richard Wood and the Class, and am duly licensed to practice law in California.

3. I attach as Exhibit 4 a true and correct copy of the current list of known Small Pumper Class members, after exclusion of opt-outs from the partial settlement approved on December 11, 2013.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 5<sup>TH</sup> day of January, 2014, at Los Angeles, California.

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Michael D. McLachlan