

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

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

15 Attorneys for Plaintiff

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

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

JUDICIAL COUNCIL COORDINATION  
PROCEEDING No. 4408

20 ANTELOPE VALLEY GROUNDWATER  
21 CASES

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

Case No.: BC391869

**RICHARD WOOD'S *EX PARTE*  
APPLICIATION FOR LEAVE TO  
FILE A REPLY BRIEF IN EXCESS OF  
TEN PAGES; DECLARATION OF  
MICHAEL D. MCLACHLAN**

Plaintiff,

v.

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

Defendants.

1 Pursuant to provisions of Rule of Court 3.1113(e), Plaintiff Richard Wood applies  
2 ex parte for permission to file a Reply brief in excess of ten pages in support of his  
3 Motion for Award of Attorneys' Fees.

4 The attached supporting declaration stated the reasons why the arguments require  
5 more than the ten pages permitted by Rule 3.1113.

6  
7 DATED: January 6, 2014

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

8  
9  
10 By: \_\_\_\_\_  
11 Michael D. McLachlan  
12 Attorneys for Plaintiff  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**DECLARATION OF MICHAEL D. McLACHLAN**

I, Michael D. McLachlan, declare:

1. I am one of the appointed class counsel for the Small Pumper Class, and am duly licensed to practice law in California. 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. The Opposition to the Motion for Award of Attorneys' Fees was 13 pages, and contained substantial number of new arguments and exhibits, most of which were not addressed in the Motion. The Reply brief is 14 pages.

3. To date in this proceeding, I have not filed an oversized brief. However, in this case, it was necessary and warranted due to the subject matter and complexity.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 6<sup>th</sup> day of January, 2014, at Los Angeles, California.

\_\_\_\_\_  
Michael D. McLachlan