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9	Attorneys for Plaintiff Richard Wood and	the Class
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12	SUPERIOR COURT FOR TH	IF STATE OF CALIFORNIA
13	COUNTY OF LOS ANGELES	
14	Coordination Proceeding	Judicial Council Coordination
15	Special Title (Rule 1550(b))	Proceeding No. 4408
16	ANTELOPE VALLEY GROUNDWATER CASES	Lead Case No. BC 325201
17	RICHARD A. WOOD, an individual, on	Case No.: BC 391869
18	behalf of himself and all others similarly situated,	
19		RICHARD WOOD'S <i>EX PARTE</i> APPLICATION FOR ORDER
20	Plaintiff,	MODIFYING CASE MANAGEMENT ORDER;
21		DECLARATION OF MICHAEL D. MCLACHLAN
22	LOS ANGELES COUNTY WATERWORKS DISTRICT NO. 40; et	
23	al.	Location: Santa Clara Superior Court, San Jose, California
24 25	Defendants.	Dept: 12 Date: January 22, 2015 Time: 10:00 a.m.
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~		LICATION FOR ORDER MODIFYING EMENT ORDER

1	TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:	
2	PLEASE TAKE NOTICE THAT on January 22, 2015, at 10:00 a.m., at the	
3	Santa Clara Superior Court, Department 12, located at 191 North 1 st Street, San	
4	Jose, California, Plaintiff Richard Wood will present the Court with an ex parte	
5	application for an order modifying the class member list.	
6	The hearing on this application will occur telephonically by CourtCall, or in	
7	such other location as the Court may designate.	
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9	DATED: January 15, 2014 LAW OFFICES OF MICHAEL D. McLACHLAN LAW OFFICE OF DANIEL M. O'LEARY	
10	LAW OFFICE OF DANIEL M. O LEARY	
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12	By: Michael D. McLachlan	
13	Attorneys for Plaintiff	
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	RICHARD WOOD'S <i>EX PARTE</i> APPLICATION FOR ORDER MODIFYING CASE MANAGEMENT ORDER	

MEMORANDUM OF POINTS AND AUTHORITIES

Plaintiff Richard Wood presents this *Ex Parte* Application to Amend the
 Case Management Order, entered by the Court on November 4, 2014.

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As the Court is aware, the parties have completed Stipulation for entry
judgment for a physical solution. Those settlement documents are presently
before numerous clients, client representatives and public agency boards for
approval. (McLachlan Decl. ¶ 2.)

8 In the November 4, 2014, Case Management Order the Court had set 9 January 15, 2015 as the date for filing of the stipulation and Judgment as well as a 10 motion seeking preliminary approval of the Small Pumper Class settlement agreement arising from the global settlement. Many of the parties have approved 11 and executed the agreement to date, and no party has yet to indicate that it will 12 13 not approve the settlement. However, due to the lengthy approval process of 14 some of the public agency parties, the stipulation is not yet fully executed and 15 thus cannot be filed by the January 15, 2015 filing deadline. (McLachlan Decl. ¶ 16 3.)

Therefore, after extensive meeting and conferring, the settling parties have
 arrived at a new schedule for review and approval of the judgment and physical
 solution, which is incorporated in the First Amended Case Management Order
 filed concurrently with this Application. Counsel for the Small Pumper Class has
 circulated the First Amended Case Management Order, has incorporated
 comments, and has received no objections thus far to the dates set forth in that
 order. (McLachlan Decl. ¶ 4.)

Other than modifying the dates, the only substantive change in the First Amended Case Management Order relates to the hearings on the final approval of the Small Pumper Class Settlement and the prove-up of the Stipulated Judgment and Physical Solution. It is anticipated that these hearings will take many days, and quite likely more than a week to complete due to the number of parties and

RICHARD WOOD'S EX PARTE APPLICATION FOR ORDER MODIFYING CASE MANAGEMENT ORDER

1	nature of the matters being addressed to the Court. Therefore, the settling	
2	parties have proposed a block of two non-consecutive weeks in August of 2015 for	
3	those hearings.	
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5	DATED: January 15, 2015 LAW OFFICES OF MICHAEL D. McLACHLAN LAW OFFICE OF DANIEL M. O'LEARY	
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8	Den	
9	By: Michael D. McLachlan	
10	Attorneys for Plaintiff	
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20	RICHARD WOOD'S <i>EX PARTE</i> APPLICATION FOR ORDER MODIFYING CASE MANAGEMENT ORDER	

DECLARATION OF MICHAEL D. MCLACHLAN

² I, Michael D. McLachlan, declare:

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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. I am counsel of record of record for Richard Wood
 and the Small Pumper Class, and am duly licensed to practice law in California.

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2. Many of the parties have completed Stipulation for entry of
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approval.

11 3. In the November 4, 2014 Case Management Order the Court had set 12 January 15, 2015 as the date for filing of the stipulation and Judgment as well as a 13 motion seeking preliminary approval of the Small Pumper Class settlement 14 agreement arising from the global settlement. Many of the parties have approved 15 and executed the agreement to date, and no party has yet to indicate that it will 16 not approve the settlement. However, due to the lengthy approval process of 17 some of the public agency parties, the stipulation is not yet fully executed and 18 thus cannot be filed by the January 15, 2015 filing deadline.

¹⁹ 4. I circulated the First Amended Case Management Order,
 ²⁰ incorporated comments, and have received no objections thus far to the dates set
 ²¹ forth in that order.

I declare under penalty of perjury under the laws of the State of California
 that the foregoing is true and correct. Executed this 15th day of January, 2015, at
 Hermosa Beach, California.

Michael D. McLachlan

RICHARD WOOD'S EX PARTE APPLICATION FOR ORDER MODIFYING CASE MANAGEMENT ORDER