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15 Attorneys for Plaintiff Richard Wood and the Class

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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
(Honorable Jack Komar)

Lead Case No. BC 325201

Case No.: BC 391869

**DECLARATION OF DANIEL M.
O'LEARY IN SUPPORT OF
SUPPLEMENTAL MOTION FOR
AWARD OF ATTORNEYS' FEES
AND COSTS**

Location: Room 222
Stanley Mosk Courthouse
Los Angeles, California
Date: July 20, 2016
Time: 10:00 a.m.

1 **DECLARATION OF DANIEL O'LEARY**

2 I, Daniel O'Leary, declare:

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

6 2. I am co-counsel of record of record for Plaintiff Richard Wood and
7 the Class, and am duly licensed to practice law in California. I graduated from
8 University of California, San Diego with a degree in mathematics, and from
9 U.C.L.A. School of Law in 1994. I have been a Plaintiff's contingent attorney for
10 over twenty years, specializing in complex litigation. I have tried many cases to
11 verdict (including one product liability verdict of \$55 million). I have
12 represented plaintiffs in state and federal courts in California, Arizona, New
13 Mexico, Texas, Nevada, Florida, and Iowa. I have given continuing legal
14 education seminars in the area of product defect litigation, jury selection, and
15 expert witness examination. I have served as liaison counsel and on steering
16 committees in coordinated tort litigation and currently serve on the steering
17 committee in the JCCP 4292 proceeding. I am a member of local, state, and
18 national trial lawyer organizations.

19 3. After January 22, 2016 to date, I have worked 45.3 hours on this
20 matter. Attached hereto as **Exhibit 1** is a true and correct copy of my fee bill.

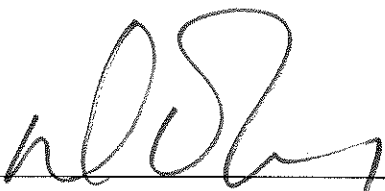
21 4. After March 11, 2016, I have incurred costs for \$212.96 for airfare to
22 San Jose for the hearing on the initial fee motion, \$24.71 n airport parking, one
23 Glotrans filing of \$24.00 and \$18.00 in parking at the Los Angeles Superior
24 Court. These case costs total \$279.67.

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 27th day of June 2016, at Los Angeles, California.



Daniel O'Leary

Exhibit 1

STATEMENT

Law Office of Daniel M. O'Leary
2300 Westwood Boulevard, Suite 105
Los Angeles, CA 90064
310-481-2020/F:481-0049

DATE: JUNE 27, 2016
STATEMENT # [100]

BILL
TO

COMMENTS

DATE	DESCRIPTION	HOURS	AMOUNT
	Supplemental time		
01/27/2016	Attend Mark Ritter depo	1.5	
01/29/2016	Conference call re: landowner selection process for Watermaster Board	1.2	
02/10/2016	Prep for and attend hearing on Ritter motion to set aside judgment	1.8	
02/12/2016	Review of fee multiplier cases (1.1), outline of reply brief on fees (0.4), legal research on CCP 1021.5 and public agency defendants (0.8)	2.3	
02/18/2016	Review of fee multiplier cases (1.9), outline of reply brief on fees (0.7), legal research on CCP 1021.5 and public agency defendants (0.2)	2.8	
02/22/2016	Conversation with McLachlan re: Lemieux's request for continuance of fee motion	0.1	
02/23/2016	Review of ex parte application for continuance of fee motion	0.2	
02/24/2016	Research re: Govt. Code 984	0.3	
03/07/2016	Review of fee surveys provided by R. Pearl	0.3	
03/16/2016	Review of small district opposition/declarations (0.9); review of D. 40 opposition (1.4); legal research re: Govt. Code 970.6, 970.8, 971, 975.2; (0.3) legal research re: fee multipliers (0.6)	3.2	
03/17/2016	Drafting reply brief (0.8); meet with McLachlan re: work allocation on reply (0.2)	1.0	
03/18/2016	Review of cases cited by D. 40 on negative multipliers (0.5); draft reply (3.8)	4.3	
03/21/2016	Draft reply	1.4	
03/22/2016	Draft reply	2.6	

03/23/2016	Draft reply (1.8); emails with MM re same (0.2)	2.0	
03/24/2016	Draft reply (0.4); legal research re: incentive awards for class reps (0.5)	0.9	
03/25/2016	Finalize portions of reply (0.8); redline edit entire draft reply (0.4)	1.2	
03/29/2016	Phone calls with MM re hearing and powerpoint (0.4); create powerpoint for hearing; prepare for hearing on fee motion	3.2	
04/01/2016	Travel to and attend hearing on fee motion, and preparation for same (San Jose) 10.0	10.0	
04/28/2016	Legal research on memo of costs, email to MM re same	0.4	
05/05/2016	Draft opposition to motion to amend judgment nunc pro tunc	0.8	
05/25/2016	Travel to and attend hearing on motion to amend judgment, motion to clarify, meeting with MM (Los Angeles)	3.8	
		45.3	