

January 14, 2009

*Via Posting on AVGW Website*

All Counsel

**Re: Antelope Valley Groundwater Cases**

As you know, on January 9, 2009, Judge Komar ordered us to meet and confer regarding certain discovery issues. After the hearing, it was suggested we meet and confer telephonically on January 21, 2009. We propose to schedule the call for 10:00 a.m. Once we have confirmed "critical mass" for the meeting, we will circulate a call-in number and other details.

We propose the following agenda for this meeting:

1. The use of questionnaire directed to parties;
2. A production list to be supplied by parties;
3. Establishment of a document repository; and
4. The appointment of liaison counsel

These topics were discussed at the status conference. We welcome additions to the agenda or other creative solutions to our discovery issues.

Please contact my assistant, Kathi Miers at [Kathi@lemieux-oneill.com](mailto:Kathi@lemieux-oneill.com) to confirm your availability.

Very truly yours,

LEMIEUX & O'NEILL



W. Keith Lemieux

KL:km