

## **EXHIBIT B**

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January 24, 2014

**VIA ELECTRONIC SERVICE**

Jeffrey V. Dunn  
Best, Best & Krieger  
5 Park Plaza, Suite 1500  
Irvine, CA 92614

**Re: *Antelope Valley Groundwater Litigation, JCCP 4408***  
***Richard A. Wood. v. Los Angeles Waterworks Dist. No. 40 et al.***

Dear Jeff:

This shall memorialize our discussion of yesterday regarding the issues surrounding Dr. Williams' deposition last week. In clarification of your email of Wednesday (attached for those not copied), you are producing all of the input files, but not the USGS Modflow model itself. I believe you indicated that there were four categories of input files, which I am slightly unclear on, but understand that they will contain the original USGS files for the Antelope Valley as well as the modified versions created by Dr. Williams and his staff.

Your statement regarding an agreement not to modify the files is only limited to the original USGS files, and arises out of concern that someone might change them and later represent that the USGS work was something other than what it originally was. I am fine with that agreement, limited only to those files. Please draw that up at your earliest convenience.

You will produce the output files from the model runs conducted by his office and the data plotting work-product. You are still looking into the question the materials received from Luhdorff & Scalaminini relating to his revised groundwater pumping work (and anything else).

I remain seriously concerned about the timing problems this situation presents, given the proximity to the trial date. I invite your input on that.

Very truly yours,



Michael D. McLachlan

cc: All Parties (*via electronic service*)

## Mike McLachlan

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**From:** Jeffrey Dunn <jeffrey.dunn@BBKLAW.COM>  
**Sent:** Wednesday, January 22, 2014 3:58 PM  
**To:** Robert Kuhs (rgkuhs@kuhsparkerlaw.com); Mike McLachlan; Michael T Fife (mfife@bhfs.com) (mfife@bhfs.com); Wes Miliband (wmiliband@awattorneys.com) (wmiliband@awattorneys.com); lmcclhaney@bmbllawoffic.com  
**Cc:** Wellen, Warren  
**Subject:** AV Adjudication Proceedings - USGS MODFLOW files

Counsel,

As we discussed during the deposition last Thursday, District No. 40 has been working on making computer USGS MODFLOW files available.

You can contact me via email to make arrangements to obtain a copy of all of the USGS Modflow model files inputted by Dr. Williams. You will need to make an agreement that the produced files cannot be modified, changed or altered.

Jeff.

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