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VIA ELECTRONIC SERVICE

Michael D. McLachlan, Esq.
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10490 Santa Monica Boulevard
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Re: *Antelope Valley Groundwater Adjudication, JCCP 4408*
Richard A. Wood v. Los Angeles County Waterworks District No. 40; et al.

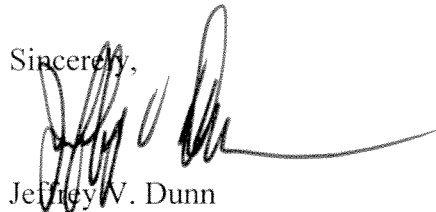
Dear Mike:

Your letter this afternoon summarizes our telephone call yesterday. We also discussed that Dr. Williams produced numerous notebooks and a computer disk with his expert witness file. You indicated that you were going to review the rough deposition transcript and the computer disk to see what, if anything, would still need to be produced.

As I indicated, the digital model input and output files are available and have been available since Wednesday – 3 business days after his deposition. But I have not received a request from anyone for the digital files.

During nearly 7 hours of deposition testimony, Dr. Williams provided his opinions and explained how he arrived at those opinions. Nonetheless, as I indicated during Dr. Williams' deposition on Thursday of last week, we can make him and/or his staff available to answer more deposition questions about the digital files.

Sincerely,



Jeffrey V. Dunn
of BEST BEST & KRIEGER LLP