

1 Ralph B. Kalfayan (SBN 133464)
Lynne M. Brennan (SBN 149131)
2 KRAUSE KALFAYAN BENINK &
SLAVENS, LLP
3 550 West C Street, Suite 530
San Diego, CA 92101
4 Tel: (619) 232-0331
Fax: (619) 232-4019

5 Class Counsel for the Willis Class
6
7

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF LOS ANGELES

10 **ANTELOPE VALLEY**
11 **GROUNDWATER CASES**

12 This Pleading Relates to Included Action:
13 REBECCA LEE WILLIS and DAVID
ESTRADA, on behalf of themselves and
14 all others similarly situated,

15 *Plaintiffs,*

16 v.

17 LOS ANGELES COUNTY
18 WATERWORKS DISTRICT NO. 40;
19 CITY OF LANCASTER; CITY OF
PALMDALE; PALMDALE WATER
20 DISTRICT; LITTLEROCK CREEK
IRRIGATION DISTRICT; PALM
21 RANCH IRRIGATION DISTRICT;
QUARTZ HILL WATER DISTRICT;
22 ANTELOPE VALLEY WATER CO.;
ROSAMOND COMMUNITY SERVICE
23 DISTRICT; PHELAN PINON HILL
COMMUNITY SERVICE DISTRICT; and
24 DOES 1 through 1,000;

25 *Defendants.*
26
27
28

RELATED CASE TO JUDICIAL COUNCIL
COORDINATION PROCEEDING NO. 4408

**ADDENDUM TO WILLIS CLASS' CASE
MANAGEMENT STATEMENT**

Date: September 21, 2015
Time: 1:00 pm
Place: Court Call - Telephonic
Judge: Hon. Jack Komar

1 The Willis Class respectfully submits the following Addendum to Case Management
2 Conference Statement in advance of the September 21, 2015, status conference.

3 An issue has come up regarding the Court-appointed expert, Mr. Tim Thompson, that Willis
4 Class Counsel must bring to the Court's attention. In a letter to Mr. Thompson dated September
5 18, 2015, Ms. Brennan requested that Mr. Thompson provide documents that he agreed to produce
6 to Willis Class Counsel following his deposition on July 27, 2015. *See* 09/18/15 Letter from Ms.
7 Brennan to Mr. Thompson attached as Exhibit A. The letter specifies the specific documents he
8 agreed to produce and the deposition pages evidencing his agreement to produce the documents.
9

10 Willis Class Counsel never received a response from Mr. Thompson. Instead, Wood Class
11 Counsel, Mr. McLachlan, intervened and stated that Mr. Thompson would not be producing the
12 documents as he had previously agreed. Willis Class Counsel objected to Wood Class Counsel's
13 intervention and instruction to the independent Court-appointed expert to not produce the
14 documents to Willis Class Counsel as previously agreed. *See* 09/18/15 Emails between Ms.
15 Brennan, Mr. McLachlan, and Mr. Thompson, collectively attached as Exhibit B.
16

17 The Willis Class hereby requests this Court to order Wood Class Counsel to refrain from
18 intervening with Willis Class Counsel's direct request to Mr. Thompson to produce the documents
19 as previously agreed.
20

21 Dated: September 18, 2015

Respectfully submitted,

22 KRAUSE KALFAYAN BENINK & SLAVENS, LLP

23
24 By: 

Ralph B. Kalfayan, Esq.

Lynne M. Brennan, Esq.

Class Counsel for the Willis Class
25
26
27
28

Exhibit A

KRAUSE, KALFAYAN, BENINK, & SLAVENS

A LIMITED LIABILITY PARTNERSHIP

550 WEST C STREET · SUITE 530

SAN DIEGO, CALIFORNIA 92101

TELEPHONE (619) 232-0331

FACSIMILE (619) 232-4019

RALPH B. KALFAYAN

ERIC J. BENINK

VINCENT D. SLAVENS

LYNNE M. BRENNAN

BENJAMIN T. BENUMOF, SPECIAL COUNSEL

JAMES C. KRAUSE (1950-2012)

WWW.KKBS-LAW.COM

4695 MACARTHUR COURT · SUITE 1460

NEWPORT BEACH, CALIFORNIA 92660

TELEPHONE (949) 287-4931

FACSIMILE (888) 400-6263

VIC A. MERJANIAN

VANESSA C. CARDINALE

STEPHEN D. COUNTS

PHILIP J. ALTIERI, OF COUNSEL

September 18, 2015

VIA EMAIL

TThompson@gsiws.com

Mr. Tim Thompson

GSI Water Solutions, Inc

418 Chapala Street, #F

Santa Barbara, CA 93101

Re: Antelope Valley Groundwater Adjudication – Court-Appointed Expert Deposition

Dear Mr. Thompson:

This is a follow up letter to your deposition as the Court-appointed expert in the Antelope Valley Groundwater cases taken on July 27, 2015. For your reference, we have enclosed a copy of your Deposition Subpoena including the Request for Production of Documents.

As you will recall from that deposition, the Willis Class through its counsel asked that copies of several responsive documents or things in your control be turned over to the Willis Class. As soon as is practicable, please provide the following documents to the law offices of Krause Kalfayan Benink & Slavens, LLP (counsel for the Willis Class) located at 550 West C Street, Suite 530, San Diego, California, 92101. Each document listed below will have a page number that references the official transcript of your deposition for your convenience in determining what document the Willis Class previously asked you to provide.

Please provide the following documents/things:

1. The scope of work referenced on page 11.
2. The "Class Member Database" or class list referenced on page 19 and 20.
3. The number of responses to the various mailers that went out in preparation of your report referenced on page 28.
4. A most recent copy of your CV referenced on page 32.
5. The GIS Data Files referenced on page 64.
6. The Excel File for Table 1 of your report referenced on page 65.

7. Any and all emails between you and Mr. McLachlan referenced on page 71.
- 7a. Any and all emails between you and any other attorney involved in this case – if they exist, referenced on page 71.
8. The list of topics that you provided to Mr. McLachlan referenced on page 87.

As I am sure you are aware, trial in this case is scheduled for the end of this month. Please provide copies of these documents which you promised to send to Willis Class Counsel as soon as possible. We look forward to your reply.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lynne M. Brennan', with a long horizontal line extending to the right.

Lynne M. Brennan
Willis Class Counsel

LMB/cb

cc: Mike McLachlan, Esq., Wood Class Counsel (via email)

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Ralph B. Kalfayan, Esq. #133464 Lynne M. Brennan, Esq. #149131 Krause, Kalfayan, Benink & Slavens, LLP 550 West "C" Street, Suite 530, San Diego, CA 92101 TELEPHONE NO.: 619-232-0331 FAX NO. (Optional): 619-232-4019 E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): Willis Class		FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 111 N. Hill Street MAILING ADDRESS: 111 N. Hill Street CITY AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: Central District		
PLAINTIFF/PETITIONER: Antelope Valley Ground Water Cases DEFENDANT/RESPONDENT: Los Angeles County Waterworks District No. 40		
DEPOSITION SUBPOENA FOR PERSONAL APPEARANCE AND PRODUCTION OF DOCUMENTS AND THINGS		CASE NUMBER: JCCP4408

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):

Tim Thompson, Senior Consultant, GSI Water Solutions, Inc. 418 Chapala St., #F, Santa Barbara, CA 93101

1. YOU ARE ORDERED TO APPEAR IN PERSON TO TESTIFY AS A WITNESS in this action at the following date, time, and place:

Date: July 7, 2015 Time: 10:00 a.m. Address: 707 Wilshire Blvd., Suite 3500, Los Angeles, CA 90017

- ☐ As a deponent who is not a natural person, you are ordered to designate one or more persons to testify on your behalf as to the matters described in item 4. (Code Civ. Proc., § 2025.230.)
 - ☒ You are ordered to produce the documents and things described in item 3.
 - ☒ This deposition will be recorded stenographically ☐ through the instant visual display of testimony and by ☒ audiotape ☒ videotape.
 - ☒ This videotape deposition is intended for possible use at trial under Code of Civil Procedure section 2025.620(d).
- The personal attendance of the custodian or other qualified witness and the production of the original records are required by this subpoena. The procedure authorized by Evidence Code sections 1560(b), 1561, and 1562 will not be deemed sufficient compliance with this subpoena.
 - The documents and things to be produced and any testing or sampling being sought are described as follows:
See Attachment 3 to this Subpoena for a full description of the documents to be produced.
☒ Continued on Attachment 3.
 - If the witness is a representative of a business or other entity, the matters upon which the witness is to be examined are described as follows:
☐ Continued on Attachment 4.
- IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.
 - At the deposition, you will be asked questions under oath. Questions and answers are recorded stenographically at the deposition; later they are transcribed for possible use at trial. You may read the written record and change any incorrect answers before you sign the deposition. You are entitled to receive witness fees and mileage actually traveled both ways. The money must be paid, at the option of the party giving notice of the deposition, either with service of this subpoena or at the time of the deposition. Unless the court orders or you agree otherwise, if you are being deposed as an individual, the deposition must take place within 75 miles of your residence or within 150 miles of your residence if the deposition will be taken within the county of the court where the action is pending. The location of the deposition for all deponents is governed by Code of Civil Procedure section 2025.250.

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF \$500 AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: June 19, 2015

Lynne M. Brennan, Esq.


(SIGNATURE OF PERSON ISSUING SUBPOENA)

Class Counsel for the Willis Class

(TYPE OR PRINT NAME)

(Proof of service on reverse)

(TITLE)

Page 1 of 2

ATTACHMENT 3

PREAMBLE

By serving these Document Requests, the Willis Class does not waive and hereby expressly incorporates and reserves all of its previously-filed objections to the CMO, the Wood Class Settlement, and the Stipulated Judgment and Proposed Physical Solution ("SPPS") as well as all arguments and evidence submitted in support of various Motions filed by the Willis Class including, but not limited to, the Motion to Enforce Willis Settlement Agreement with Public Water Suppliers and Motion to Enforce Due Process Rights of Willis Class. This Discovery is being propounded by the Willis Class in support of its continuing efforts to enforce the Willis Stipulation of Settlement (Settlement Agreement) and the Willis Judgment.

DEFINITIONS AND INSTRUCTIONS

- A. The terms "YOU" and "YOUR" shall refer to Tim Thompson.
- B. The term "SPPS" shall mean the Stipulated Judgment and Proposed Physical Solution filed with the Court on March 4, 2015.
- C. The term "PARTY" shall mean any party to the Coordinated Proceeding, Case No. JCCP4408, commonly referred to as the "Antelope Valley Groundwater Adjudication."
- D. The term "COMMUNICATIONS", as used herein, means any transmission of information and the information transmitted.
- E. The term "DOCUMENT" is used herein in its broadest sense and includes any writing or compilation of information (in either hard copy or electronic form). "DOCUMENTS" include both the original and any copy or draft, and all copies that contain any notation not on the original. Examples of documents include, but are not limited to, e-mails, photographs, receipts, handwritten,

typed, or printed papers, handwritten notes, office notes, letters, facsimiles, calendar entries, diaries, memoranda, press clippings, reports, presentations, worksheets, spreadsheets, invoices, correspondence, ledger entries, audio and video recordings, voice mail, films, computer printouts, cards, tapes, disks, social media postings, and other types of electronically or magnetically maintained information.

F. The terms “REFER” or “RELATE”, as used herein, shall be interpreted broadly, including both explicit and implicit reference to mean (without limitation) “defining,” “discussing,” “containing,” “construing,” “referring,” “concerning,” “constituting,” “embodying,” “pertaining,” “stating,” “supporting,” “dealing with,” or “prepared as a result of.”

G. If you object to providing any document requested on the ground that such information is privileged, you should identify the privilege claimed and state the basis for that claim, identifying the pertinent circumstances with sufficient specificity to permit Plaintiff Willis Class to assess the applicability of the privilege.

H. All documents in your possession, custody, or control shall be produced, regardless of whether such document is physically in your possession.

I. Documents that are produced shall be accompanied by the original file folders, binders, or other containers in which they are stored (or legible copies of the labels from and other notations on those folders, binders, or containers).

DOCUMENT REQUESTS DIRECTED TO
COURT-APPOINTED EXPERT TIM THOMPSON

DOCUMENT REQUEST NO. 1:

All DOCUMENTS that reflect, REFER to or RELATE to any PARTY, or anyone acting on their behalf, including, but not limited to, correspondence, notes, memoranda, drafts, applications, invoices, bills, receipts, estimates, contracts, retainer agreements, visual depictions, photographs, and videotapes.

DOCUMENT REQUEST NO. 2:

All DOCUMENTS that reflect, REFER to or RELATE to any COMMUNICATIONS between YOU and any PARTY, or anyone acting on their behalf, including, but not limited to, correspondence, notes, memoranda, drafts, forms, invoices, bills, receipts, estimates, contracts, retainer agreements, visual depictions, photographs, and videotapes.

DOCUMENT REQUEST NO. 3:

All DOCUMENTS that reflect, REFER to or RELATE to any COMMUNICATIONS between YOU and any PARTY, or anyone acting on their behalf, including, but not limited to, surveys, correspondence, notes, memoranda, drafts, forms, invoices, bills, receipts, estimates, contracts, retainer agreements, visual depictions, photographs, and videotapes.

DOCUMENT REQUEST NO. 4:

All DOCUMENTS that reflect, REFER to or RELATE to any COMMUNICATIONS between YOU and any Wood Class Member, or anyone acting on their behalf, including, but not limited to, surveys, correspondence, notes, memoranda, drafts, forms, invoices, bills, receipts, estimates, contracts, retainer agreements, visual depictions, photographs, and videotapes.

DOCUMENT REQUEST NO. 5:

All DOCUMENTS that reflect, REFER to or RELATE to any COMMUNICATIONS between YOU and any Willis Class Member, or anyone acting on their behalf, including, but not limited to, surveys, correspondence, notes, memoranda, drafts, forms, invoices, bills, receipts, estimates, contracts, retainer agreements, visual depictions, photographs, and videotapes.

DOCUMENT REQUEST NO. 6:

All DOCUMENTS that reflect, REFER to or RELATE to the SPPS, including, but not limited to, correspondence, notes, memoranda, drafts, forms, invoices, bills, receipts, estimates, contracts, retainer agreements, visual depictions, photographs, and videotapes.

DOCUMENT REQUEST NO. 7:

YOUR entire file in this case.

DOCUMENT REQUEST NO. 8:

All DOCUMENTS reviewed or considered by YOU in forming any opinion in this case.

DOCUMENT REQUEST NO. 9:

All DOCUMENTS or exhibits to be used by YOU as a summary of or support for forming any opinions in this case.

DOCUMENT REQUEST NO. 10:

All DOCUMENTS that evidence or reflect the time spent and the amounts charged in this case, including, but not limited to, billing files.

DOCUMENT REQUEST NO. 11:

A copy of YOUR current curriculum vitae or resume, including a list of all publications authored by YOU within the preceding ten years.

DOCUMENT REQUEST NO. 12:

Copies of any publications authored by YOU within the preceding ten years.

DOCUMENT REQUEST NO. 13:

Copies of any transcripts of depositions or trial pertaining to proceedings in which YOU testified as an expert.

DOCUMENT REQUEST NO. 14:

A listing of any other cases in which YOU testified as an expert or by deposition within the preceding ten years.

DOCUMENT REQUEST NO. 15:

A listing of any other cases in which YOU have been retained by any attorney representing a PARTY and/or anyone acting on their behalf.

Exhibit B

Lynne Brennan

From: Ian Krupar
Sent: Friday, September 18, 2015 1:29 PM
To: TThompson@gsiws.com; mike@mclachlan-law.com
Cc: Lynne Brennan; Ralph Kalfayan
Subject: Antelope Valley Groundwater Cases - Court Appointed Expert - Document Requests
Attachments: 2015.09.18 Ltr to Tim Thompson to Provide Documents.pdf; 2015.06.19 Subpoena Tim Thompson.pdf

Hello Mr. Thompson:

Please find attached to this email a letter from Attorney Lynne M. Brennan.

Please feel free to call Lynne at 619-232-0331 with any questions.

Thank you,

Ian D. Krupar
Law Clerk

Krause Kalfayan
Benink & Slavens, LLP
550 W. C Street, Suite 530
San Diego, CA 92101
(800) 232-0924
(619) 232-0331
(619) 232-4019 fax

ikrupar@kkbs-law.com
www.kkbs-law.com

From: Mike McLachlan [<mailto:mike@mclachlan-law.com>]
Sent: Friday, September 18, 2015 3:13 PM
To: Ian Krupar <ikrupar@kkbs-law.com>; TThompson@gsiws.com
Cc: Lynne Brennan <lbrennan@kkbs-law.com>; Ralph Kalfayan <ralph@kkbs-law.com>;
'jeffrey.dunn@bbklaw.com' <jeffrey.dunn@bbklaw.com>; Michael Fife (MFife@bhfs.com) <MFife@bhfs.com>
Subject: RE: Antelope Valley Groundwater Cases - Court Appointed Expert - Document Requests

Lynne/Ralph,

Mr. Thompson has testified already. We do not currently plan to recall him for any rebuttal. Therefore, I do not see the point in this.

There is also the procedural issue that the subpoena was not actually served, although that is clearly subordinate to first point.

Mike McLachlan

Law Offices of Michael D. McLachlan, APC

44 Hermosa Avenue
Hermosa Beach, CA 90254

Office: 310-954-8270
Fax: 310-954-8271

From: Lynne Brennan [<mailto:lbrennan@kkbs-law.com>]
Sent: Friday, September 18, 2015 3:19 PM
To: Mike McLachlan; Ian Krupar; TThompson@gsiws.com
Cc: Ralph Kalfayan; 'jeffrey.dunn@bbklaw.com'; Michael Fife (MFife@bhfs.com)
Subject: RE: Antelope Valley Groundwater Cases - Court Appointed Expert - Document Requests

Mike,

As you know, Mr. Thompson is on the list of experts to be called at trial that was circulated by BB&K. In any event, we have the right to introduce evidence related to Mr. Thompson's expert report and his deposition testimony at trial. He agreed to produce the documents listed in my letter to him after his deposition and we expect him to follow-through on those agreements. Mr. Thompson is the Court-appointed expert and you have no right to intervene and prevent him from providing the documents to us as agreed. If you attempt to do so, we will seek sanctions from the Court.

Lynne M. Brennan, Esq.
Of Counsel

Krause Kalfayan
Benink & Slavens, LLP
550 W. C Street, Suite 530
San Diego, CA 92101
(800) 232-0924
(619) 232-0331
(619) 232-4019 fax
lbrennan@kkbs-law.com
www.kkbs-law.com

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From: Mike McLachlan [<mailto:mike@mclachlan-law.com>]

Sent: Friday, September 18, 2015 3:32 PM

To: Lynne Brennan <lbrennan@kkbs-law.com>; Ian Krupar <ikrupar@kkbs-law.com>; TThompson@gsiws.com

Cc: Ralph Kalfayan <ralph@kkbs-law.com>; 'jeffrey.dunn@bbklaw.com' <jeffrey.dunn@bbklaw.com>; Michael Fife (MFife@bhfs.com) <MFife@bhfs.com>

Subject: RE: Antelope Valley Groundwater Cases - Court Appointed Expert - Document Requests

Lynne,

Mr. Thompson was erroneously put on that list by BB&K. Your choice not to answer the threshold question, and engage on a meet and confer process, suggests that this is a pointless venture.

With that, I will leave it to you to take the matter up with the Court if you feel so inclined. And please include Jeff Dunn and Michael Fife on correspondence with Mr. Thompson, as they are designated liaison counsel.

Mike McLachlan

Law Offices of Michael D. McLachlan, APC

[44 Hermosa Avenue](#)
[Hermosa Beach, CA 90254](#)
Office: 310-954-8270
Fax: 310-954-8271

From: Lynne Brennan [<mailto:lbrennan@kkbs-law.com>]
Sent: Friday, September 18, 2015 3:39 PM
To: Mike McLachlan; Ian Krupar; TThompson@gsiws.com
Cc: Ralph Kalfayan; 'jeffrey.dunn@bbklaw.com'; Michael Fife (MFife@bhfs.com)
Subject: RE: Antelope Valley Groundwater Cases - Court Appointed Expert - Document Requests

Mike,

My correspondence was directed to Mr. Thompson. You were merely copied on it as a courtesy. I do not need to take anything up with the Court unless I find out that you directed Mr. Thompson not to produce the listed documents as he previously agreed.

***Lynne M. Brennan, Esq.
Of Counsel***

Krause Kalfayan
Benink & Slavens, LLP
550 W. C Street, Suite 530
San Diego, CA 92101
(800) 232-0924
(619) 232-0331
(619) 232-4019 fax
lbrennan@kkbs-law.com
www.kkbs-law.com

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From: Mike McLachlan [<mailto:mike@mclachlan-law.com>]

Sent: Friday, September 18, 2015 3:47 PM

To: Lynne Brennan <lbrennan@kkbs-law.com>; Ian Krupar <ikrupar@kkbs-law.com>; TThompson@gsiws.com

Cc: Ralph Kalfayan <ralph@kkbs-law.com>; 'jeffrey.dunn@bbklaw.com' <jeffrey.dunn@bbklaw.com>; Michael Fife (MFife@bhfs.com) <MFife@bhfs.com>

Subject: RE: Antelope Valley Groundwater Cases - Court Appointed Expert - Document Requests

Lynne,

You may take this e-mail as that direction. You can now take the matter up with the Court.

Mike McLachlan

Law Offices of Michael D. McLachlan, APC

[44 Hermosa Avenue](#)
[Hermosa Beach, CA 90254](#)
Office: 310-954-8270
Fax: 310-954-8271

From: Lynne Brennan [<mailto:lbrennan@kkbs-law.com>]

Sent: Friday, September 18, 2015 3:57 PM

To: TThompson@gsiws.com

Cc: Ralph Kalfayan; 'jeffrey.dunn@bbklaw.com'; Michael Fife (MFife@bhfs.com); Ian Krupar; Mike McLachlan

Subject: RE: Antelope Valley Groundwater Cases - Court Appointed Expert - Document Requests

Mr. Thompson,

You are an independent Court-appointed expert. You are not Mr. McLachlan's retained expert.

Please respond directly to this email and let me know if you are going to produce the documents listed in my letter to you of today's date as you agreed to do during your deposition. If you no longer agree to produce the documents listed in my letter to you of today's date, please indicate the basis for your refusal to produce the documents as previously agreed.

It is the position of the Willis Class and their counsel that you are required to produce the documents to us as you previously agreed. Further, it is the position of the Willis Class and their counsel that Wood Class Counsel, in particular, Mr. McLachlan, has no legal right to prevent you from producing the listed documents as you previously agreed or to direct you not to produce them. As noted, Willis Class Counsel will seek sanctions against Mr. McLachlan if you do not follow-through on your agreements to produce the listed documents.

Please let me know if you have any questions.

Thank you,

***Lynne M. Brennan, Esq.
Of Counsel***

Krause Kalfayan

Benink & Slavens, LLP

[550 W. C Street, Suite 530](#)

[San Diego, CA 92101](#)

(800) 232-0924

(619) 232-0331

(619) 232-4019 fax

lbrennan@kkbs-law.com

www.kkbs-law.com

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From: Mike McLachlan [<mailto:mike@mclachlan-law.com>]

Sent: Friday, September 18, 2015 4:09 PM

To: Lynne Brennan <lbrennan@kkbs-law.com>; TThompson@gsiws.com

Cc: Ralph Kalfayan <ralph@kkbs-law.com>; 'jeffrey.dunn@bbklaw.com' <jeffrey.dunn@bbklaw.com>; Michael Fife (MFife@bhfs.com) <MFife@bhfs.com>; Ian Krupar <ikrupar@kkbs-law.com>; Dan Oleary <dan@danolearylaw.com>

Subject: RE: Antelope Valley Groundwater Cases - Court Appointed Expert - Document Requests

Lynne,

That is enough. I will take the matter to the Court if you will not. You have no more right to be instructing Mr. Thompson than anyone else. His responsibilities are set forth in the court-approved scope of work. He has completed the last of those tasks: testifying at trial.

Mike McLachlan

Law Offices of Michael D. McLachlan, APC

44 Hermosa Avenue
Hermosa Beach, CA 90254

Office: 310-954-8270

Fax: 310-954-8271

From: Lynne Brennan [mailto:lbrennan@kkbs-law.com]
Sent: Friday, September 18, 2015 4:14 PM
To: Mike McLachlan; TThompson@gsiws.com
Cc: Ralph Kalfayan; 'jeffrey.dunn@bbklaw.com'; Michael Fife (MFife@bhfs.com); Ian Krupar; Dan Oleary
Subject: RE: Antelope Valley Groundwater Cases - Court Appointed Expert - Document Requests

Mike,

I am awaiting Mr. Thompson's response. I suggest you refrain from any further attempts to control the independent, Court-appointed expert.

***Lynne M. Brennan, Esq.
Of Counsel***

Krause Kalfayan
Benink & Slavens, LLP
550 W. C Street, Suite 530
San Diego, CA 92101
(800) 232-0924
(619) 232-0331
(619) 232-4019 fax
lbrennan@kkbs-law.com
www.kkbs-law.com

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Lynne Brennan

From: Mike McLachlan <mike@mclachlan-law.com>
Sent: Friday, September 18, 2015 4:40 PM
To: Lynne Brennan; TThompson@gsiws.com
Cc: Ralph Kalfayan; 'jeffrey.dunn@bbklaw.com'; Michael Fife (MFife@bhfs.com); Ian Krupar; Dan Oleary
Subject: RE: Antelope Valley Groundwater Cases - Court Appointed Expert - Document Requests

Mr. Thompson,

I apologize for all of this. I will bring the matter to the Court's attention and advise you on his ruling.

Mike McLachlan

Law Offices of Michael D. McLachlan, APC
44 Hermosa Avenue
Hermosa Beach, CA 90254
Office: 310-954-8270
Fax: 310-954-8271

From: Lynne Brennan [mailto:lbrennan@kkbs-law.com]
Sent: Friday, September 18, 2015 4:14 PM
To: Mike McLachlan; TThompson@gsiws.com
Cc: Ralph Kalfayan; 'jeffrey.dunn@bbklaw.com'; Michael Fife (MFife@bhfs.com); Ian Krupar; Dan Oleary
Subject: RE: Antelope Valley Groundwater Cases - Court Appointed Expert - Document Requests

Mike,

I am awaiting Mr. Thompson's response. I suggest you refrain from any further attempts to control the independent, Court-appointed expert.

***Lynne M. Brennan, Esq.
Of Counsel***

Krause Kalfayan
Benink & Slavens, LLP
550 W. C Street, Suite 530
San Diego, CA 92101
(800) 232-0924
(619) 232-0331
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