

1 Michael D. McLachlan (State Bar No. 181705)
2 **LAW OFFICES OF MICHAEL D. McLACHLAN, APC**
3 523 West Sixth Street, Suite 215
4 Los Angeles, California 90014
5 Telephone: (213) 630-2884
6 Facsimile: (213) 630-2886
7 mike@mclachlanlaw.com

8 Daniel M. O'Leary (State Bar No. 175128)
9 **LAW OFFICE OF DANIEL M. O'LEARY**
10 523 West Sixth Street, Suite 215
11 Los Angeles, California 90014
12 Telephone: (213) 630-2880
13 Facsimile: (213) 630-2886
14 dan@danolearylaw.com

15 Attorneys for Plaintiff

16
17
18
19
20
21
22
23
24
25
26
27
28
SUPERIOR COURT FOR THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

14 RICHARD A. WOOD, an individual, on
15 behalf of himself and all others similarly
16 situated,

17 Plaintiff,

18 v.

19 LOS ANGELES COUNTY
20 WATERWORKS DISTRICT NO. 40; et al.

21 Defendants.

Case No.: BC391869

(related to JUDICIAL COUNCIL
COORDINATION PROCEEDING No.
4408; Santa Clara Case No. 1-05-CV-
049053, Honorable Jack Komar)

**DECLARATION OF MICHAEL D.
MCLACHLAN IN SUPPORT OF AND
MOTION FOR CLASS
CERTIFICATION**

Date: August 11, 2008
Time: 9:00 a.m.
Place: LASC Dept. 1

1 I, Michael D. McLachlan, declare:

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

5 2. I am counsel of record of record for the claimants, and am duly licensed to
6 practice law in California.

7 3. I am informed by counsel for the water purveyors that there are
8 approximately 7,500 members of this proposed class.

9 4. Richard A. Wood has agreed to act as class representative in this action and
10 to protect the interests of absent class members.

11 5. I and the other attorneys representing Plaintiff have extensive experience
12 in complex civil litigation, including class actions.

13 I declare under penalty of perjury under the laws of the State of California that the
14 foregoing is true and correct. Executed this 20th day of June, 2008, at Los Angeles,
15 California.

16
17 

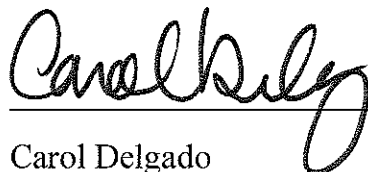
18 Michael D. McLachlan
19
20
21
22
23
24
25
26
27
28

1 PROOF OF SERVICE

2 I am a resident of the State of California and over the age of eighteen years, and
3 not a party to the within action. My business address is 523 West Sixth Street, Suite
4 215, Los Angeles, CA, 90014. On the date set forth below, I served the within
5 document(s) by posting the document(s) listed below to the Santa Clara County
6 Superior Court website in regard to the Antelope Valley Groundwater matter:

7 **DECLARATION OF MICHAEL D. MCLACHLAN IN SUPPORT OF AND**
8 **MOTION FOR CLASS CERTIFICATION**
9

10 I declare under penalty of perjury under the laws of the State of California that the
11 above is true and correct. Executed on June 20, 2008, at Los Angeles, California.

12 
13
14 Carol Delgado