

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 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**  
18 **COUNTY OF LOS ANGELES**

19 Coordination Proceeding  
20 Special Title (Rule 1550(b))

21 ANTELOPE VALLEY GROUNDWATER  
22 CASES

23 RICHARD A. WOOD, an individual, on  
24 behalf of himself and all others similarly  
25 situated,

26 Plaintiff,

27 v.

28 LOS ANGELES COUNTY  
WATERWORKS DISTRICT NO. 40; et al.

Defendants.

Judicial Council Coordination  
Proceeding No. 4408

(Santa Clara Case No. 1-05-CV-049053,  
Honorable Jack Komar)

Case No.: BC 391869

**DECLARATION OF RICHARD  
WOOD IN SUPPORT OF RENEWED  
MOTION FOR APPOINTMENT OF  
EXPERT**

**Date: April 24, 2009**  
**Time: 9:00 a.m.**  
**Dept.: 1**

1 I, Richard A. Wood, declare:

2 1. I am a plaintiff in this action, and the court-appointed class representative  
3 for the Small Pumpers' Class. I make this declaration of my own personal knowledge,  
4 except where stated on information and belief, and if called to testify in Court on these  
5 matters, I could do so competently.

6 2. I have lived at 45763 North 90<sup>th</sup> Street East, Lancaster, California for over  
7 25 years. On September 30, 1983, I took fee title to this ten-acre parcel and have owned  
8 continually since that date. As long as I have owned the property, it has contained the  
9 same single family residence, which was built many years before I purchased it.

10 3. For the entire time this property has been a residence, it has been serviced  
11 by a groundwater well. To my knowledge, there has never been municipal water service  
12 to this property, and certainly none during my ownership. My property is not part of any  
13 mutual water company.

14 4. Over the 25 years I have owned the property, my water usage has been  
15 solely for domestic purposes. All of this water is pumped from a well I maintain on my  
16 property, and all of it is used on the property.

17 I declare under penalty of perjury under the laws of California and the United  
18 States of America that the foregoing is true and correct. Executed this 9th day of  
19 February, 2009, at Lancaster, California.

20  
21 

22 Richard A. Wood  
23  
24  
25  
26  
27

**PROOF OF SERVICE**

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and am not a party to the within action. My business address is 523 West Sixth Street, Suite 215, Los Angeles, California 90014.

On March 30, 2009, I caused the foregoing document(s) described as **DECLARATION OF RICHARD WOOD IN SUPPORT OF RENEWED MOTION FOR APPOINTMENT OF EXPERT** to be served on the parties in this action, as follows:

- (X) (BY ELECTRONIC SERVICE) by posting the document(s) listed above to the Santa Clara County Superior Court website: [www.scefiling.org](http://www.scefiling.org) regarding the Antelope Valley Groundwater matter.
- ( ) (BY U.S. MAIL) I am readily familiar with the firm's practice of collection and processing of documents for mailing. Under that practice, the above-referenced document(s) were placed in sealed envelope(s) addressed to the parties as noted above, with postage thereon fully prepaid and deposited such envelope(s) with the United States Postal Service on the same date at Los Angeles, California, addressed to:
- ( ) (BY FEDERAL EXPRESS) I served a true and correct copy by Federal Express or other overnight delivery service, for delivery on the next business day. Each copy was enclosed in an envelope or package designed by the express service carrier; deposited in a facility regularly maintained by the express service carrier or delivered to a courier or driver authorized to receive documents on its behalf; with delivery fees paid or provided for; addressed as shown on the accompanying service list.
- ( ) (BY FACSIMILE TRANSMISSION) I am readily familiar with the firm's practice of facsimile transmission of documents. It is transmitted to the recipient on the same day in the ordinary course of business.
- (X) (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.
- ( ) (FEDERAL) I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

\_\_\_\_\_  
//s//  
Carol Delgado